EXHIBIT E - APPENDIX A

CONSULTATION RECORD

Introduction

As discussed in Section 1.3, subsequent to filing the Pre-Application Document (PAD) with the Federal Energy Regulatory Commission (FERC) on December 10, 2021, Oglethorpe Power Corporation (OPC) received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented an overview of the TLP and its proposed plans to consult with stakeholders and conduct resource studies.

The Georgia Department of Natural Resources (GDNR) Wildlife Resources Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. OPC consulted with GDNR Wildlife Resources Division, FWS, the GDNR Environmental Protection Division (GEPD), and the Georgia Department of Community Affairs Historic Preservation Division (GHPD/SHPO) on the proposed study plans in meetings and email communications from April through July 2022 in an effort to address agency interests and align on study scope and methods. Following these informal consultation meetings, study plans were finalized and made available in August 2022 on OPC's Rocky Mountain Relicensing website (https://opc.com/rockymountainrelicensing/). OPC also consulted with FWS and GDNR Wildlife Resources Division in September 2022 to expand the aquatic resources study to conduct a separate survey targeting the presence/absence of the Trispot Darter, a federally threatened species.

Resource studies were performed between June 2022 and September 2023. Throughout this time, OPC informally consulted with GDNR Wildlife Resources Division, FWS, and GEPD on the resource studies. After the first year of studies, in May and June 2023, OPC again met with these agencies to discuss preliminary study results. In particular, OPC consulted with GEPD on a second season of water of water quality analysis related to dissolved oxygen, including continuous water quality monitoring, which was conducted in summer 2023.

Prior to submitting the Draft License Application (DLA), OPC met with GDNR Wildlife Resources Division in October 2023 to discuss study results and potential measures for enhancing recreation facilities and access at the Project, as well as potential measures related to aquatic and terrestrial resources.

The following records document OPC's consultation with resource agencies, Indian Tribes, and other interested stakeholders from filing of the PAD to submittal of the DLA.



1050 Thomas Jefferson Street, NW Seventh Floor Washington, DC 20007 (202) 298-1800 Phone (202) 338-2416 Fax

Michael A. Swiger (202) 298-1891 mas@vnf.com

VIA ELECTRONIC FILING

December 10, 2021

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

> Re: Rocky Mountain Pumped Storage Hydroelectric Project No. 2725; Proof of Publication

Dear Secretary Bose:

Oglethorpe Power Corporation (An Electric Membership Corporation), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project No. 2725 (Project), hereby files with the Federal Energy Regulatory Commission on behalf of itself and co-licensees Georgia Power Company, Rocky Mountain Leasing Corporation, and U.S. Bank National Association, proof of publication of public notice of the filing of the Notice of Intent and Pre-Application Document for the Project. Attached as Attachment A are the notarized affidavit of publication and ad text.

Please contact the undersigned or Craig Jones at (770) 270-7348 or Craig.Jones@opc.com with any questions about this filing or if you need additional information.

Respectfully submitted,

s/ Michael A. Swiger
Michael A. Swiger

Counsel to Oglethorpe Power Corporation

Attachment



AFFIDAVIT OF PUBLICATION

State of Georgia, } S.S.

County of Floyd

I, Otis A. Brumby III, do solemnly swear

that I am the Publisher of THE

ROME NEWS-TRIBUNE, printed and published at

Rome in the state of Georgia, and that from my personal

knowledge and reference to files of said publication

the advertisement of RN2999 ROCKY MOUNT.

RN2999 GPN14 NOTICE OF FI

was inserted in THE ROME NEWS-TRIBUNE

in space of Legal

on dates as follows:

12/10/2021

Subscribed and sworn to before me

Otis A. Brumby III

This 10th day of December, 2021

Nøtary Public

Ad text : RN2999 gpn14

NOTICE OF FILING WITH

FEDERAL ENERGY REGULATORY COMMISSION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), on behalf of itself and co-licensees Georgia Power Company, Rocky Mountain Leasing Corporation, and U.S. Bank National Association, hereby provides notice of its filing with the Federal Energy Regulatory Commission (FERC) of (1) the Notification of Intent (NOI) for the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (the Project), (2) the Pre-Application Document (PAD) for the Project, and (3) a Request to use the Traditional Licensing Process (TLP) under 18 CFR Section 5.3. The Project is an existing hydroelectric facility located in Floyd County, GA on Heath Creek approximately 10 miles northwest of Rome, GA. The Project has an installed capacity of 904 megawatts and includes a 221-acre upper reservoir, a 600-acre lower reservoir, a powerhouse, and two auxiliary pools totaling 600 acres. The filing date of the NOI, PAD, and request to use the TLP will bae on December 10, 2021. The NOI provides notice of OPCs intent to apply for a new license for the Project. The PAD summarizes available information relevant to describing the existing environment and potential impacts associated with continued project operation. The request to use the TLP is based on the belief that the TLP will be in the best interest of FERC and all participants due to: its flexible timeframes, which will assist in achieving FERCs goal of timely license issuance; a low likelihood for complex resource issues or controversy at the Project; lower relative cost compared to the Integrated Licensing Process (ILP); OPCs early consultation efforts, which have advanced development of preliminary study plans in the PAD and will reduce the potential for significant disputes over studies; and OPCs existing partnership with the Georgia Department of Natural Resources in managing the recreation, fisheries, and wildlife resources at the Project. OPC invites resource agencies, Indian Tribes, and members of the public interested in the proceedings to participate in the relicensing and to comment on this notice and related matters. Mailings on this Project can be sent to Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084, to the attention of Dr. Craig Jones, Director Environmental Policy, (770) 270-7348. The PAD is available for inspection and reproduction (i) at OPCs above address, (ii) on OPCs Rocky Mountain relicensing website at https://opc.com/rockymountainrelicensing, and (3) on FERCs eLibrary at https://www.ferc.gov/ferc-online/elibrary. Comments on the use of the TLP are due to FERC and OPC no later than 30 days following the filing of the request to use the TLP. Comments on use of the TLP must reference the project number (P-2725) and should address, as appropriate to the circumstances of the request, the: (A) likelihood of timely license issuance; (B) complexity of the resource issues; (C) level of anticipated controversy; (D) relative cost of the TLP compared to the ILP; (E) the amount of available information and potential for significant disputes over studies; and (F) other factors believed by the commenter to be pertinent. Respondents must submit comments to the Secretary of the Commission in accordance with filing procedures posted on FERCs website at https://www.ferc.gov/filing-instructions. 12:10, 2021

Jaime Loichinger Advisory Council on Historic Preservation 401 F Street NW, Suite 308 Washington, DC 20001-2637

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jaime.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

The Project is located near Rome, Georgia, and was originally licensed on January 21, 1977. The original project license will expire on December 31, 2026, and OPC is seeking a new license for the Project. The relicensing process will occur over the next several years and begins with the filing of our NOI, PAD, and request to use the TLP. Consistent with Federal Energy Regulatory Commission (FERC) regulations, the PAD provides detailed information about the project, including a description of the project, relevant information about the project environment, potential resource impacts, and a list of preliminary studies.

As provided in the email, the PAD is available for inspection and reproduction at the following locations: 1) Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084; 2) on OPC's Rocky Mountain relicensing webpage at https://opc.com/rockymountainrelicensing; and 3) on FERC's eLibrary at https://elibrary.ferc.gov/eLibrary/docinfo?accession_num=20211210-5030.

Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

John Eddins Advisory Council on Historic Preservation 401 F Street NW, Suite 308 Washington, DC 20001-2637

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear John.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Cecilia Flores Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, TX 77351

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Cecilia.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Nelson Harjo Alabama-Quassarte Tribal Town P.O. Box 187 Wetumka, OK 74883

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Nelson,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Ben Emanuel American Rivers 108 East Ponce de Leon Ave. Suite 212 Decatur, GA 30030

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Ben,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Kevin Colburn American Whitewater P.O. Box 1540 Cullowhee, NC 28723

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Kevin,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Stephen Briggs Berry College 2277 Martha Berry Hwy NW Mount Berry, GA 30149

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Stephen,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Darryl LaCounte Bureau of Indian Affairs, U.S. Department of the Interior MS-4606, 1849 C Street NW Washington, DC 20240

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Darryl,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jason Winters Chattooga County 10102 Commerce Street Summerville, GA 30747

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jason,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Chuck Hoskin Jr. Cherokee Nation P.O. Box 948 Tahlequah, OK 74465-0948

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Chuck.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Elizabeth Toombs Cherokee Nation P.O. Box 948 Tahleguah, OK 74465-0948

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Elizabeth,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Craig McDaniel City of Rome 601 Broad Street Rome, GA 30162

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Craig,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Harry Harvey City of Summerville 120 Georgia Avenue Summerville, GA 30747

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Harry,

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

Jesse Demonbreun-Chapman Coosa River Basin Initiative 5 Broad Street Rome, GA 30161

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jesse.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

Linda Langley Coushatta Tribe of Louisiana P.O. Box 10 Elton, LA 70532

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Linda.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

David Sickey Coushatta Tribe of Louisiana P.O. Box 818 Elton, LA 70532

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear David.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Richard Sneed Eastern Band of Cherokee Indians P.O. Box 1927 Cherokee, NC 28719

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Richard.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Russell Townsend Eastern Band of Cherokee Indians P.O. Box 455 Cherokee, NC 28719

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Russell.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jamie McCord Floyd County 12 East 4th Avenue Rome, GA 30161

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jamie.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

Bruce Ivey Floyd County 12 East 4th Avenue, Suite 100 Rome, GA 30161

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Bruce.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

David Crass Georgia Department of Community Affairs - Historic Preservation Division 60 Executive Park South, NE Atlanta, GA 30329

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear David.

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Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jennifer Dixon Georgia Department of Community Affairs - Historic Preservation Division 60 Executive Park South, NE Atlanta, GA 30329

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jennifer.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Santiago Martinez Georgia Department of Community Affairs - Historic Preservation Division 60 Executive Park South, NE Atlanta, GA 30329

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Santiago,

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Director, Environmental Policy

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CC: Mike Price

Aspen Kemmerlin Georgia Department of Community Affairs - Historic Preservation Division 60 Executive Park South, NE Atlanta, GA 30329

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Aspen,

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

James Capp Georgia Department of Natural Resources - Environmental Protection Division 2 Martin Luther King, Jr. Dr., Suite 1152 East Atlanta, GA 30334

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear James,

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Elizabeth Booth Georgia Department of Natural Resources - Environmental Protection Division 2 Martin Luther King, Jr. Dr., Suite 1152 East Atlanta, GA 30334

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Elizabeth,

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jennifer Welte Georgia Department of Natural Resources - Environmental Protection Division 2 Martin Luther King, Jr. Dr., Suite 1152 East Atlanta, GA 30334

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jennifer.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Wei Zeng Georgia Department of Natural Resources - Environmental Protection Division 2 Martin Luther King, Jr. Dr., Suite 1152 East Atlanta, GA 30334

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Wei.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Stephen Wiedl Georgia Department of Natural Resources - Environmental Protection Division 7 Martin Luther King, Jr. Dr., Suite 450 Atlanta, GA 30334

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Stephen,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Dennis Shiley
Georgia Department of Natural Resources - Parks, Recreation and Historic Sites Division
4054 Big Texas Valley Road, NW
Rome, GA 30165

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Dennis.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Rusty Garrison Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Rusty,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Thom Litts
Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E.
Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Thom.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Scott Robinson Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Scott.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Clint Peacock Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Clint.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Hakala Georgia Department of Natural Resources - Wildlife Resources Division 2650 Floyd Springs Road Armuchee, GA 30105

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jim,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jon Ambrose Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jon.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

Brett Albanese Georgia Department of Natural Resources - Wildlife Resources Division 2065 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Brett.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Brent Womack Georgia Department of Natural Resources - Wildlife Resources Division 2650 Floyd Springs Road Armuchee, GA 30105

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Brent.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Paula Marcinek Georgia Department of Natural Resources - Wildlife Resources Division 2067 U.S. Highway 278, S.E. Social Circle, GA 30025

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Paula.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jackson Sibley
Georgia Department of Natural Resources - Wildlife Resources Division
2650 Floyd Springs Road
Armuchee, GA 30105

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jackson.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

David Gregory
Georgia Department of Natural Resources - Wildlife Resources Division
2650 Floyd Springs Road
Armuchee, GA 30105

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear David.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Theron Menken Georgia Department of Natural Resources - Wildlife Resources Division 1014 MLK Boulevard Fort Valley, GA 31030

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Theron.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jeff Sibley Georgia Forestry Commission 141 Wilshire Road Rome, GA 30161

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jeff.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Mike Brunson Georgia Forestry Commission 141 Wilshire Road Rome, GA 30161

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Mike.

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CJ/dy

CC: Mike Price

Herbie Johnson Georgia Power Company (c/o Southern Company Generation) 241 Ralph McGill Blvd., Bin 10193 Atlanta, GA 30308-3374

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Herbie.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

The Project is located near Rome, Georgia, and was originally licensed on January 21, 1977. The original project license will expire on December 31, 2026, and OPC is seeking a new license for the Project. The relicensing process will occur over the next several years and begins with the filing of our NOI, PAD, and request to use the TLP. Consistent with Federal Energy Regulatory Commission (FERC) regulations, the PAD provides detailed information about the project, including a description of the project, relevant information about the project environment, potential resource impacts, and a list of preliminary studies.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Courtenay O'Mara Georgia Power Company (c/o Southern Company Genration) 241 Ralph McGill Blvd., Bin 10193 Atlanta, GA 30308

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Courtenay,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Rena Ann Peck Georgia River Network 126 S. Milledge Ave., Suite E3 Athens, GA 30605

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Rena Ann.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jason Winters Georgia Soil and Water Conservation Commission Region II 4310 Lexington Road Athens, GA 30605

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Jason,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Brian Givens Kialegee Tribal Town P.O. Box 332 Wetumka, OK 74883-0332

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Brian.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

David Hill Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear David.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Corain Lowe-Zepeda Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Corain,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

LeeAnne Wendt Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear LeeAnne.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Turner Hunt Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Turner.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Bob Vogel National Park Service 100 Alabama Street, SW Atlanta, GA 30303

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Bob.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith

Toni Presnell

Kim Amendola National Oceanic and Atmospheric Administration Fisheries Service 263 13th Avenue South St. Petersburg, FL 33701

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Kim.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Lloyd Frasier Northwest Georgia Regional Commission 1 Jackson Hill Drive, P.O. Box 1798 Rome, GA 30162-1798

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Lloyd,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Marcellus Osceola, Jr. Seminole Tribe of Florida 6300 Stirling Road Hollywood, FL 33024

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Marcellus.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Theodore Isham Seminole Nation of Oklahoma P.O. Box 1498 Wewoka, OK 74884

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Theodore.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Ryan Morrow Thlopthlocco Tribal Town P.O. Box 188 Okemah, OK 74859

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Ryan,

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Joe Bunch United Keetoowah Band of Cherokee P.O. Box 746 Tahleguah, OK 74465

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Joe.

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Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

John Blevins U.S. Environmental Protection Agency Region 4 61 Forsyth St., SW Atlanta, GA 30303

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear John.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

The Project is located near Rome, Georgia, and was originally licensed on January 21, 1977. The original project license will expire on December 31, 2026, and OPC is seeking a new license for the Project. The relicensing process will occur over the next several years and begins with the filing of our NOI, PAD, and request to use the TLP. Consistent with Federal Energy Regulatory Commission (FERC) regulations, the PAD provides detailed information about the project, including a description of the project, relevant information about the project environment, potential resource impacts, and a list of preliminary studies.

As provided in the email, the PAD is available for inspection and reproduction at the following locations: 1) Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084; 2) on OPC's Rocky Mountain relicensing webpage at https://opc.com/rockymountainrelicensing; and 3) on FERC's eLibrary at https://elibrary.ferc.gov/eLibrary/docinfo?accession_num=20211210-5030.

Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Ntale Kajumba U.S. Environmental Protection Agency Region 4 61 Forsyth St., SW Atlanta, GA 30303

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Ntale.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Maria Clark U.S. Environmental Protection Agency Region 4 61 Forsyth St., SW Atlanta, GA 30303

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Maria.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

John Doresky U.S. Fish and Wildlife Service P.O. Box 52560 Fort Benning, GA 31995

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear John.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Eric Bauer U.S. Fish and Wildlife Service 355 East Hancock Avenue, Room 320, Box 7 Athens, GA 30601

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Eric.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Peter Maholland U.S. Fish and Wildlife Service 355 East Hancock Avenue, Room 320, Box 7 Athens, GA 30601

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Peter.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

December 17, 2021

Edward Hunter U.S. Forest Service - Chattahoochee National Forest 1755 Cleveland Highway Gainesville, GA 30501

Re: Rocky Mountain Pumped Storage Project (FERC No. 2725)

Dear Edward.

On December 10, 2021, Oglethorpe Power Corporation (OPC) filed a Notice of Intent (NOI), Pre-Application Document (PAD), and Request to Use the Traditional Licensing Process (TLP) for the relicensing of the Rocky Mountain Pumped Storage Project (Project). Also on December 10, 2021, OPC sent you and other potentially interested parties an email notification of the filing through our consultant, Kleinschmidt Associates. This letter is being sent as a follow up to help ensure you receive timely notification.

The Project is located near Rome, Georgia, and was originally licensed on January 21, 1977. The original project license will expire on December 31, 2026, and OPC is seeking a new license for the Project. The relicensing process will occur over the next several years and begins with the filing of our NOI, PAD, and request to use the TLP. Consistent with Federal Energy Regulatory Commission (FERC) regulations, the PAD provides detailed information about the project, including a description of the project, relevant information about the project environment, potential resource impacts, and a list of preliminary studies.

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Additionally, per 18 CFR §5.3(d)(1), comments on OPC's request to use the TLP must be filed with FERC within 30 days of December 10, 2021.

Please contact Tyler McCaslin at (770) 270-7723 or tyler.mccaslin@opc.com with any questions about this filing.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy

CJ/dy

CC: Mike Price

Jim Messersmith Toni Presnell



United States Department of the Interior

Fish and Wildlife Service

RG Stephens, Jr. Federal Building 355 East Hancock Avenue, Room 320 Athens, Georgia 30601

West Georgia Sub Office P.O. Box 52560 Ft. Benning, Georgia 31995-2560



Coastal Sub Office 4980 Wildlife Drive Townsend, Georgia 31331

January 6, 2022

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

Subject: Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 – Georgia Notification of Intent to File Application for New License, Pre-Application Document, Request to Use Traditional Licensing Process, Request for Designation or Authorization under Section 7 of Endangered Species Act and Section 106 of National Historic Preservation Act

Dear Ms. Bose:

On December 12, 2021 Oglethorpe Power Corporation (OPC; An Electric Membership Corporation) (OPC), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 (Rocky Mountain Project, Project), notified the Federal Energy Regulatory Commission (FERC, Commission) on behalf of itself and co-licensees Georgia Power Company, Rocky Mountain Leasing Corporation, and U.S. Bank National Association of its intent to relicense the Project and filed a Pre-Application Document. We, the Fish and Wildlife Service (Service), submit the following comments pursuant to the authorities of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. § 1531 et seq.), the Fish and Wildlife Coordination Act (16 U.S.C. § 661 et seq.), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), and the Federal Power Act (16 U.S.C. § 791a, et seq.).

Based on the information provided in the Pre-Application Document (PAD) and our own assessment of fish and wildlife resources potentially in the project area or its area of influence, we support Oglethorpe Power Corporation's intent to use the Traditional Licensing Process for relicensing the Rocky Mountain Pumped Storage Hydroelectric Project. We also support OPC's expressed intent to conduct aquatic resource surveys in Heath Creek downstream of the project because it has been approximately 20 years since the last survey of fishes in Heath Creek and this creek has likely never been surveyed for mussels.

We also note several discrepancies or omissions that require correction in the aquatic fish and wildlife resources or rare, threatened, and endangered sections of the PAD.

In section 4.4.1.5 Freshwater Mollusks, the applicant only describes 3 species of freshwater mussel that could potentially occur in Heath Creek. Further, the applicant states that "Several federally listed threatened and endangered species of mussels occur in the Oostanaula River downstream of the Project, but all of these species inhabit larger creeks and rivers and are not

known to occur in smaller creeks the size of Heath Creek." This is not strictly correct, the finelined pocketbook (Hamiota altilis) is Federally and GA threatened species with shells collected from 3 locations in Armuchee Creek. Georgia DNR's suggest that this species occurs in small streams to large rivers in a variety of substrates and flows (https://georgiabiodiversityportal.org/natels/profile?es_id=22049). Although all three records of this species in the Armuchee Creek watershed were of shells and no live specimens, it is possible that this species could occur in Heath Creek and the lack of records likely indicate a lack of sampling and not necessarily the lack of presence in Heath Creek. It is also the opinion of the Service that Heath Creek was, at least historically, a large creek with a drainage area of 24 square miles (https://streamstats.usgs.gov/) and thus Heath Creek may, or may have historically, provided habitat for mussels that occur in large creeks. To this end we also request that the applicant amend their PAD narrative in this section to include all mussels recorded in the broader Armuchee Creek watershed as possible inhabitants in Heath Creek. Georgia DNR has records of the Coosa fiveridge (Amblema elliottii; no status), finelined pocketbook (threatened), southern clubshell (Pleurobema decisum; endangered), southern pigtoe (Pleurobema georgianum; endangered), Alabama rainbow (Villosa nebulosa; none) and Coosa creekshell (Villosa umbrans; petitioned and undergoing status review) from the Armuchee Creek watershed.

Table 18 in Section 4.7 should also include the state protected (Rare) rock darter (*Etheostoma rupestre*).

We would also like to make the applicant aware that the Service has been petitioned to conduct a species status assessment for the Cherokee clubtail (*Stenogomphus consanguis*), a dragonfly known to inhabit small first- and second-order, typically spring-fed streams and Georgia DNR has records of this species being collected within 3 miles of the project area to the west, from the headwaters of Armuchee Creek, as well as from Johns Creek, a tributary of the Oostinaula River located upstream and adjacent to Armuchee Creek. These data suggest that this species could still occur, or could have historically occurred, within the project area.

We appreciate the opportunity to review and provide comments on the PAD for the Rocky Mountain Pumped Storage Hydroelectric Project. Please contact staff biologist Eric Bauer (eric_bauer@fws.gov) with the Service's Georgia Ecological Services Field Office in Athens, Georgia for additional information or if you require further assistance.

Sincerely,

Peter Maholland Acting Field Supervisor



MARK WILLIAMS COMMISSIONER

TED WILL DIRECTOR

January 5, 2022

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Room 1A Washington, DC 20426

RE:

Comments on Request for use of Traditional License Process Rocky Mountain Pumped Storage Hydropower Project (P-2725)

Dear Secretary Bose:

We appreciate the opportunity to review the request for use of the Traditional License Process (TLP), included with Oglethorpe Power Corporation's (OPC) Notice of Intent filed with your agency on December 10, 2021. We recognize that this project has impacts to the water quality, aquatic habitats and species, and recreational opportunities within, upstream, and downstream of the project area. We plan to attend the Joint Agency Meeting this Spring, review the PAD, and provide comments and study requests during the relicensing process.

We have no opposition to use of the TLP and look forward to the relicensing process and continued collaboration with OPC.

Sincerely,

Ted Will

Cc.

Jon Ambrose

Scott Robinson

Alan Isler

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

Oglethorpe Power Corporation, Georgia Power Company, Project No. 2725-075 Rocky Mountain Leasing Corporation, and U.S. Bank National Association

NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT, AND APPROVING USE OF THE TRADITIONAL LICENSING PROCESS

(January 26, 2022)

- a. Type of Filing: Notice of Intent to File License Application and Request to Use the Traditional Licensing Process.
- b. Project No.: 2725-075
- c. Dated Filed: December 10, 2021
- d. Submitted By: Oglethorpe Power Corporation
- e. Name of Project: Rocky Mountain Pumped Storage Hydroelectric Project
- f. Location: On Heath Creek, Floyd County, Georgia. The project does not occupy any federal lands.
- g. Filed Pursuant to: 18 C.F.R. § 5.5 of the Commission's regulations
- h. Applicant Contact: Craig A. Jones, Environmental Policy Director, Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084, (770) 270-7348, craig.jones@opc.com.
- i. FERC Contact: Michael Spencer at (202) 502-6093 or michael.spencer@ferc.gov.
- j. Oglethorpe Power Corporation (OPC) filed its request to use the Traditional Licensing Process on December 10, 2021. OPC provided public notice of its request on December 10, 2021. In a letter dated January 26, 2022, the Director of the Division of Hydropower Licensing approved OPC's request to use the Traditional Licensing Process.
- k. With this notice, we are initiating informal consultation with the U.S. Fish and Wildlife Service and/or NOAA Fisheries under section 7 of the Endangered

Species Act and the joint agency regulations thereunder at 50 C.F.R., Part 402; and NOAA Fisheries under section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations at 50 C.F.R. § 600.920. We are also initiating consultation with the Georgia State Historic Preservation Officer, as required by section 106, National Historic Preservation Act, and the implementing regulations of the Advisory Council on Historic Preservation at 36 C.F.R. § 800.2.

- 1. With this notice, we are designating OPC as the Commission's non-federal representative for carrying out informal consultation, pursuant to section 7 of the Endangered Species Act and section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act; and consultation pursuant to section 106 of the National Historic Preservation Act.
- m. OPC filed a Pre-Application Document (PAD; including a proposed process plan and schedule) with the Commission, pursuant to 18 C.F.R. § 5.6 of the Commission's regulations.
- n. A copy of the PAD may be viewed on the Commission's website (http://www.ferc.gov), using the "eLibrary" link. Enter the docket number, excluding the last three digits in the docket number field to access the document. For assistance, contact FERC Online Support at FERCONlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).
- o. The applicant states its unequivocal intent to submit an application for a new license for Project No.2725-075. Pursuant to 18 C.F.R. §§ 16.8, 16.9, and 16.10 each application for a new license and any competing license applications must be filed with the Commission at least 24 months prior to the expiration of the existing license. All applications for license for this project must be filed by December 31, 2024.
- p. Register online at https://ferconline.ferc.gov/eSubscription.aspx to be notified via e-mail of new filing and issuances related to this or other pending projects. For assistance, contact FERC Online Support.

Kimberly D. Bose, Secretary.

FEDERAL ENERGY REGULATORY COMMISSION WASHINGTON, DC 20426 January 26, 2022

OFFICE OF ENERGY PROJECTS

Project No. 2725-075 – Georgia Rocky Mountain Pumped Storage Hydroelectric Project Oglethorpe Power Corporation

VIA FERC Service

Craig A. Jones Oglethorpe Power Corporation 2100 East Exchange Place Tucker, Georgia 30084

Reference: Authorization to Use the Traditional Licensing Process

Dear Mr. Jones:

In a letter filed December 10, 2021, Oglethorpe Power Corporation (OPC) requested to use the Traditional Licensing Process (TLP) in preparing a relicensing application for the 904-megawatt Rocky Mountain Pumped Storage Hydroelectric Project, located on Heath Creek, Floyd County, Georgia. On the same date, OPC filed a notice of intent (NOI) and preapplication document (PAD) for the project.

Pursuant to section 5.3(d) of the Commission's regulations, on December 10, 2021, OPC also filed documentation with the Commission showing that it published a notice of the request to use the TLP in the December 10, 2021 edition of The Rome News-Tribune.² The notice contained the information required in section 5.3(d)(2) of the Commission's regulations, including a statement requesting that comments on the request to use the TLP be filed with the Commission by January 9, 2022. Comments were filed by the Georgia Department of Natural Resources' Wildlife Resources Division, on January 6, 2022, and by the U.S. Department of the Interior's Fish and Wildlife Service, on January 7, 2022. Both agencies support use of the TLP.

Based on staff's review of OPC's PAD, the complexity of the resource issues is believed to be minor, the level of anticipated controversy and dispute over studies is

¹ 18 C.F.R. § 5.3(d) (2021).

² See letter filed December 10, 2021, FERC Accession No. 20211210-5206.

expected to be minimal, and there is a reasonable amount of available information regarding resources associated with the project. Therefore, OPC's request to use the TLP is granted.

To ensure that all of the issues and study needs are identified, the TLP requires OPC to carry out specific steps during pre-filing consultation, including an initial joint agency public meeting and site visit, an opportunity for stakeholders to request studies, stakeholder review of a draft license application, and a meeting to resolve any disputes on the draft license application. Under the TLP if there are disputes over the studies that OPC proposes to conduct, a dispute resolution mechanism is available under section 16.8(b)(6) of the Commission's regulations. Additionally, if OPC files a license application that lacks any necessary information, Commission staff may request additional information or require additional studies at that time.

Section 16.8 of the Commission's regulations describes the pre-filing steps that need to be completed when preparing an application for a hydropower license under the TLP, including consultation and conducting necessary studies [18 C.F.R. §16.8(a)-(e)]. Specific steps that will need to be carried out during pre-filing consultation include an initial joint agency/public meeting and site visit [§16.8(b)(3)]; an opportunity for participants to request studies [§16.8(b)(5)]; preparation and participant review of a draft application [§16.8(c)(4)]; and a meeting to resolve any disputes on the draft application [§16.8(c)(6)]. Please note that the initial joint agency/public meeting, is required to be held no sooner than 30 days, nor later than 60 days, from the date of this letter [§16.8(b)(3)(ii)].

If you have any questions, please contact Michael Spencer at (202) 502-6093 or via email at michael.spencer@ferc.gov.

Sincerely,

Vince Yearick
Director
Division of Hydropower Licensing

From: THPO

To: McCaslin, Tyler

Subject: Rocky Mountain Pumped Storage

Date: Thursday, January 27, 2022 9:39:40 AM

Attachments: <u>image001.jpg</u>

External E-Mail

Greetings from the Thlopthlocco Tribal Town

In regards to the Rocky Mountain Pumped Storage Project (FERC No.2725) We are not aware of any potential adverse effects to historic, cultural, or archaic properties. Therefore Thlopothlocco Tribal town has no concerns or objections.

I am also informing that I am the new THPO. I prefer email only (eco friendly).

Thank you,

David Frank THPO Thlopthlocco Tribal Town P.O. Box 188 Okemah, OK 74859 (918) 560-6113



From: McCaslin, Tyler

To: <u>Steven Layman</u>; <u>"Kelly Kirven"</u>

Cc: <u>Jones, Craig</u>

Subject: FW: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Joint Meeting

Date: Monday, February 21, 2022 5:52:00 PM

Attachments: <u>image001.png</u>

FYI this extra one was for Anna Truszczynski.

-Tyler

From: McCaslin, Tyler <tyler.mccaslin@opc.com>

Sent: Monday, February 21, 2022 5:49 PM **To:** McCaslin, Tyler <tyler.mccaslin@opc.com>

Cc: Jones, Craig <craig.jones@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
Subject: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project -

Joint Meeting

Good Afternoon,

As part of the relicensing process for the Rocky Mountain Pumped Storage Hydroelectric Project (Project), Oglethorpe Power Corporation (OPC) will be holding a consultation and informational meeting on March 16, 2022. The purpose of the meeting is to: 1) provide an overview of the Project, including a virtual site visit; 2) review information about the Project; and 3) discuss and answer questions about the data and studies to be developed by OPC as part of the consultation process.

To accommodate as many participants as possible, the meeting will be held twice on March 16, 2022: first from 2:00 to 4:00 PM and again from 6:00 to 8:00 PM. The meeting will be held virtually through the online platform Webex. A virtual tour of Project facilities will be presented at each meeting. If you would like to attend the virtual meeting, please contact Dr. Tyler McCaslin at Tyler.McCaslin@opc.com or (770) 270-7723 to receive the agenda and call-in information. This information will also be available shortly on the relicensing website below.

A summary of major issues identified to date has been presented in the Pre-Application Document (PAD). The PAD is available for inspection and reproduction (1) at Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084, (2) on OPC's Rocky Mountain relicensing website at https://opc.com/rockymountainrelicensing, and (3) on FERC's eLibrary at https://www.ferc.gov/ferc-online/elibrary.

For additional information or questions regarding this meeting or the relicensing of the Project, please contact Craig Jones, Director Environmental Policy, (770) 270-7348; Craig.Jones@opc.com.

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7723 Mobile: 404-576-9097 Email: tyler.mccaslin@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: Zeng, Wei; Capp, James; Booth, Elizabeth; Welte, Jennifer; Wiedl, Stephen

Cc: McCaslin, Tyler

Subject: RE: Rocky Mountain Join Consultation Meeting
Date: Monday, February 21, 2022 1:45:57 PM

Attachments: <u>image001.png</u>

Thanks, Wei. We will follow up with a calendar invite to those you've identified below.

We'll include Ania on our distribution list and defer to you on her involvement at this time. We plan to conduct an in-person site tour in the future, and that may be a good time to include her.

Best,

сj

From: Zeng, Wei [mailto:Wei.Zeng@dnr.ga.gov]

Sent: Monday, February 21, 2022 1:40 PM

To: Jones, Craig <craig.jones@opc.com>; Capp, James <James.Capp@dnr.ga.gov>; Booth, Elizabeth <Elizabeth.Booth@dnr.ga.gov>; Welte, Jennifer <Jennifer.Welte@dnr.ga.gov>; Wiedl, Stephen

<Stephen.Wiedl@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: Re: Rocky Mountain Join Consultation Meeting

External E-Mail

Thanks, Craig.

I would say that the best way of making sure that the meeting is on our calendar is to send a calendar invite.

Elizabeth Booth, Stephen Wiedl, and Wei Zeng will attend the meeting. You could make it optional to Jennifer Welte. James (Jac) Capp, Chief of EPD's Watershed Protection Branch, has retired from EPD and can be removed from the distribution list.

Jac's successor is Anna (Ania) Truszczynski. I have spoken with Ania on the issue and do not believe she needs to be in an early meeting like this. (Please let me know if you think otherwise.)

Thanks.

Wei

Wei Zeng, Ph.D., Professional Hydrologist Manager, Water Supply Program Watershed Protection Branch, Georgia EPD 470-251-4897 (Zoom Phone) New! 470-898-3891 (Cell)

From: Jones, Craig < craig.jones@opc.com>
Sent: Monday, February 21, 2022 1:23 PM

To: Zeng, Wei < <u>Wei.Zeng@dnr.ga.gov</u>>; Capp, James < <u>James.Capp@dnr.ga.gov</u>>; Booth, Elizabeth < <u>Elizabeth.Booth@dnr.ga.gov</u>>; Welte, Jennifer < <u>Jennifer.Welte@dnr.ga.gov</u>>; Wiedl, Stephen < <u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: RE: Rocky Mountain Join Consultation Meeting

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Hi Wei,

We have not sent an invite. I'm not thinking that we will send a calendar invite to the entire distribution list. However, we will be sending a more formal notice later today with all the meeting details.

In order to monitor attendance, we'll be asking everyone who will be attending to contact Tyler McCaslin (copied here), and he'll provide a webex link and agenda.

Let us know if you think it would be better for us to send a calendar invite, and we can look into the best way to do that.

I'm happy to discuss further as needed. Feel free to reach out to me at any of the numbers listed below.

Best,

ci

From: Zeng, Wei [mailto:Wei.Zeng@dnr.ga.gov]
Sent: Monday, February 21, 2022 1:10 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Capp, James <<u>James.Capp@dnr.ga.gov</u>>; Booth, Elizabeth <<u>Elizabeth.Booth@dnr.ga.gov</u>>; Welte, Jennifer <<u>Jennifer.Welte@dnr.ga.gov</u>>; Wiedl, Stephen <<u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: Re: Rocky Mountain Join Consultation Meeting

External E-Mail

Craig,

Have you sent a meeting invite already? I do not see it on my calendar.

Please check. Thanks.

Wei

Wei Zeng, Ph.D., Professional Hydrologist Manager, Water Supply Program Watershed Protection Branch, Georgia EPD 470-251-4897 (Zoom Phone) New! 470-898-3891 (Cell)

From: Jones, Craig < craig.jones@opc.com > Sent: Monday, February 21, 2022 12:53 PM

To: Zeng, Wei < Wei.Zeng@dnr.ga.gov>; Capp, James < James.Capp@dnr.ga.gov>; Booth, Elizabeth < Elizabeth.Booth@dnr.ga.gov>; Welte, Jennifer < Jennifer.Welte@dnr.ga.gov>; Wiedl, Stephen < Stephen.Wiedl@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: RE: Rocky Mountain Join Consultation Meeting

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I meant to mention I the my earlier email that Both meetings on March 16 will be virtual. Best, cj

From: Jones, Craig

Sent: Monday, February 21, 2022 12:49 PM

To: 'Zeng, Wei' < <u>Wei.Zeng@dnr.ga.gov</u>>; 'Capp, James' < <u>James.Capp@dnr.ga.gov</u>>; 'Booth, Elizabeth' < <u>Elizabeth.Booth@dnr.ga.gov</u>>; 'Welte, Jennifer' < <u>Jennifer.Welte@dnr.ga.gov</u>>; 'Wiedl,

Stephen' <<u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: RE: Rocky Mountain Join Consultation Meeting

Good afternoon,

I'm following up on our email discussion regarding the joint meeting. We will be sending out an email to our distribution list this afternoon announcing the meeting for March 16 from 2-4 and 6-8. We are anticipating that most agencies will attend the afternoon session. No need to attend both, unless you'd like to.

Thanks for the coordination, and please reach out with any questions in the meantime.

Best,

From: Jones, Craig

Sent: Thursday, February 17, 2022 2:48 PM

To: 'Zeng, Wei' < <u>Wei.Zeng@dnr.ga.gov</u>>; Capp, James < <u>James.Capp@dnr.ga.gov</u>>; Booth, Elizabeth < <u>Elizabeth.Booth@dnr.ga.gov</u>>; Welte, Jennifer < <u>Jennifer.Welte@dnr.ga.gov</u>>; Wiedl, Stephen < <u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>

Subject: RE: Rocky Mountain Join Consultation Meeting

Great. Thanks for the quick response, Wei. Best, cj

From: Zeng, Wei [mailto:Wei.Zeng@dnr.ga.gov]
Sent: Thursday, February 17, 2022 2:46 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Capp, James <<u>James.Capp@dnr.ga.gov</u>>; Booth, Elizabeth <<u>Elizabeth.Booth@dnr.ga.gov</u>>; Welte, Jennifer <<u>Jennifer.Welte@dnr.ga.gov</u>>; Wiedl, Stephen <<u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>

Subject: Re: Rocky Mountain Join Consultation Meeting

External E-Mail

Thanks, Craig.

March 14 and 16 would work for me. I am fine with the meeting being virtual.

Thanks.

Wei

Wei Zeng, Ph.D., Professional Hydrologist Manager, Water Supply Program Watershed Protection Branch, Georgia EPD 470-251-4897 (Zoom Phone) New! 470-898-3891 (Cell)

From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, February 17, 2022 2:05 PM

To: Capp, James < <u>James.Capp@dnr.ga.gov</u>>; Booth, Elizabeth < <u>Elizabeth.Booth@dnr.ga.gov</u>>; Welte, Jennifer < <u>Jennifer.Welte@dnr.ga.gov</u>>; Zeng, Wei < <u>Wei.Zeng@dnr.ga.gov</u>>; Wiedl, Stephen < <u>Stephen.Wiedl@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com>

Subject: Rocky Mountain Join Consultation Meeting

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Good Afternoon,

I'm reaching out to let you know that we are targeting either March 14, 15, and 16 for a joint FERC relicensing consultation meeting on the studies and resource needs for the Rocky Mountain pumped storage project. We would have one afternoon (2-4) and one evening (6-8) meeting on one of those days. We are also strongly leaning toward doing this meeting virtually, given COVID-19 protocols that may be in place for participants.

Please let me know if any of those dates won't work for you and if you have any thoughts on holding the meeting virtually.

I'm also happy to chat with you directly. Just let me know and we can set something up.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





1050 Thomas Jefferson Street, NW Seventh Floor Washington, DC 20007 (202) 298-1800 Phone (202) 338-2416 Fax

Michael A. Swiger (202) 298-1891 mas@vnf.com

VIA ELECTRONIC FILING

February 28, 2022

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

> Re: Rocky Mountain Pumped Storage Hydroelectric Project No. 2725-075; Proof of Publication for Notice of Joint Agency and Public Meetings

Dear Secretary Bose:

Oglethorpe Power Corporation (An Electric Membership Corporation), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project No. 2725 (Project), hereby files with the Federal Energy Regulatory Commission on behalf of itself and co-licensees Georgia Power Company, Rocky Mountain Leasing Corporation, and U.S. Bank National Association, proof of publication of public notice of the joint agency and public meetings to discuss the relicensing of the Project. *See* 18 C.F.R. § 16.8(b)(3) and (4) (2021). Attached as Attachment A are the notarized affidavit of publication and ad text.

Please contact the undersigned or Craig Jones at (770) 270-7348 or Craig. Jones@opc.com with any questions about this filing or if you need additional information.

Respectfully submitted,

s/ Michael A. Swiger
Michael A. Swiger

Counsel to Oglethorpe Power Corporation

CC: Distribution List

Attachment



AFFIDAVIT OF PUBLICATION

State of Georgia, } S.S.
County of Floyd

I, Otis A. Brumby III, do solemnly swear
that I am the Publisher of THE
ROME NEWS-TRIBUNE, printed and published at
Rome in the state of Georgia, and that from my personal
knowledge and reference to files of said publication
the advertisement of RN3234 OGLETHORPE POWER C
RN3234 GPN14 NOTICE JOINT
was inserted in THE ROME NEWS-TRIBUNE
in space of Legal
on dates as follows:
02/25/2022

Subscribed and sworn to before me

Otis A. Brumby III

This 25th day of February, 2022

Notary Public



Ad text:
RN3234
gpn14
NOTICE
JOINT AGENCY AND PUBLIC MEETING
ROCKY MOUNTAIN PUMPED

STORAGE HYDROELECTRIC PROJECT FERC NO. 2725

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), on behalf of itself and co-licensees Georgia Power Company, Rocky Mountain Leasing Corporation, and U.S. Bank National Association, will host a Joint Agency and Public Meeting on March 16, 2022, to discuss the Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (Project) (FERC No. 2725). The Project is an existing hydroelectric facility located in Floyd County, GA on Heath Creek approximately 10 miles northwest of Rome, GA. The Project has an installed capacity of 904 megawatts and includes a 221-acre upper reservoir, a 600-acre lower reservoir, a powerhouse, and two auxiliary pools totaling 600 acres. The purpose of the meeting is to: 1) provide an overview of the Project, including a virtual site visit; 2) review information about the Project; and 3) discuss and answer questions about the data and studies to be developed by OPC as part of the consultation process.

The meeting will be held twice on March 16, 2022: first from 2:00 to 4:00 PM and again from 6:00 to 8:00 PM. The meeting will be held virtually through the online platform Webex. A virtual tour of Project facilities will be presented at each meeting. If you would like to attend the virtual meeting, please contact Dr. Tyler McCaslin at Tyler.McCaslin@opc.com or (770) 270-7723 to receive the agenda and call-in information. A summary of major issues identified to date has been presented in the Pre-Application Document (PAD). The PAD is available for inspection and reproduction (1) at Oglethorpe Power Corporation, 2100 East Exchange Place, Tucker, GA 30084, (2) on OPCs Rocky Mountain relicensing website at https://opc.com/rockymountainrelicensing, and (3) on FERCs eLibrary at https://www.ferc.gov/ferc-online/elibrary.

For additional information or questions regarding this meeting or the relicensing of the Project, please contact Dr. Craig Jones, Director Environmental Policy, (770) 270-7348; Craig.Jones@opc.com. 2:25, 2022

From: McCaslin, Tyler
To: "Booth, Elizabeth"

Bcc: <u>Jones, Craig</u>; <u>Steven Layman</u>; <u>Kelly Kirven</u>

Subject: RE: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Joint Meeting

Date: Wednesday, March 16, 2022 10:11:00 AM

Attachments: <u>image001.png</u>

Thanks!

-Tyler

From: Booth, Elizabeth < Elizabeth. Booth@dnr.ga.gov>

Sent: Wednesday, March 16, 2022 9:10 AM **To:** McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: RE: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project

- Joint Meeting

External E-Mail

Afternoon meeting

From: McCaslin, Tyler < <u>tyler.mccaslin@opc.com</u>>

Sent: Tuesday, March 15, 2022 3:54 PM

To: Booth, Elizabeth < Elizabeth.Booth@dnr.ga.gov >

Cc: Zeng, Wei < Wei.Zeng@dnr.ga.gov >; Wiedl, Stephen < Stephen.Wiedl@dnr.ga.gov >; Welte, Jennifer < Jennifer.Welte@dnr.ga.gov >; Jones, Craig < Craig.jones@opc.com >; Steven Layman@Kleinschmidtgroup.com >; Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com >

Subject: RE: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project

- Joint Meeting

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Hi Elizabeth,

Were you planning to attend the evening meeting (6-8 PM) in addition to the afternoon meeting (2-4)? Just wanted to double check since you are the only RSVP for the late session.

Thanks!

-Tyler

-----Original Appointment-----

From: McCaslin, Tyler

Sent: Wednesday, March 2, 2022 11:38 AM

To: McCaslin, Tyler

Cc: Wei.Zeng@dnr.ga.gov; Stephen.Wiedl@dnr.ga.gov; Elizabeth.Booth@dnr.ga.gov;

jennifer.welte@dnr.ga.gov

Subject: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project -

Joint Meeting

When: Wednesday, March 16, 2022 6:00 PM-8:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: https://foc.webex.com/foc/j.php?MTID=m8ef14e63ecc9ed43f961c1ad15e8c255

Hi Stephen, Elizabeth, and Wei,

Attached are the connection details and agenda for the Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) virtual joint meetings. Please note that for both sessions we will be presenting the same content, and we anticipate that most agencies will attend the afternoon (2-4 PM) session. There is no need to attend both unless you would like to.

Please let me know if you have any further questions or have any difficulties connecting to the meeting on March 16th. We are looking forward to meeting with you all.

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7723 Mobile: 404-576-9097 Email: tyler.mccaslin@opc.com Web: www.opc.com





Welcome

Rocky Mountain Pumped Storage Hydroelectric Project

FERC Relicensing (P-2725) - Joint Meeting and Virtual Site Tour

March 16, 2022

The meeting will begin shortly





Agenda – Craig Jones



Meeting Purpose: Provide an overview of the Rocky Mountain Pumped Storage Hydroelectric Project, including a virtual site visit, review information about the Project, and discuss the data and studies to be developed by Oglethorpe Power Corporation as part of the consultation process.

- Introductions
- Relicensing Review and Project Information
 - Relicensing Overview and Traditional Licensing Process
 - Relicensing Schedule and Major Milestones
 - Project Overview and Virtual Site Visit
 - Pre-Application Document Overview
 - Resource Areas
 - Information Needs
 - Proposed Studies
- Questions and Discussion on the PAD, Information Needs, and Proposed Studies
- Next Steps
- ▶ Public Comment
- ► Adjourn

3/16/2022 2



Project Information and Relicensing Review

Craig Jones

Tyler McCaslin

Rick Hayes





Project Background – Craig Jones

- Licensed by the Federal Energy Regulatory Commission (FERC)
- ► Existing License Term
 - Originally licensed to Georgia Power Company in 1977
 - 50-year license term
 - Oglethorpe Power acquired majority share of Rocky Mountain in 1988
 - Oglethorpe retains responsibility for planning, licensing, design, control, construction, operation and maintenance
 - Operations began in 1995
 - Entered into an agreement with Georgia DNR in 1997 to manage recreation, fish and wildlife resources, and associated habitat
 - License amended in 2005 to increase project capacity
 - Existing License expires on December 31, 2026
- New License Term
 - Oglethorpe Power will file an application for a new license by December 31, 2024
 - FERC will issue a new project license effective after December 31, 2026
 - Automatic annual licenses until FERC issues a new license order



FERC Relicensing Process

- Federal Energy Regulatory Commission (FERC) Jurisdiction
 - Licensing and oversight authority
 - 30 to 50 years
 - Non-federal hydropower projects on navigable waterways, and non-navigable waterways where the power is sold in interstate commerce
 - Equal consideration of power development and environmental factors
 - Applicant required to consult with agencies, tribes, and the public
- Notice of Intent and Pre-Application Document
 - Filed on December 10, 2021
 - Project and Resource Information
 - Proposed Studies
 - Determine project-related effects
 - Request to use the Traditional Licensing Process (TLP)
 - FERC granted the use of the TLP on January 26, 2022



FERC Relicensing Process

- Traditional Licensing Process
 - Three formal stages of consultation
 - Stage 1 Consultation
 - Notice of Intent/Pre-Application Document/Request to Use TLP
 - FERC Notice of Commencement/Approval of TLP
 - Joint Meeting
 - Written comments on studies (60-days after Joint Meeting)
 - Stage 2 Consultation
 - Conduct studies
 - Distribute Draft License Application
 - Written comments from interested parties
 - Joint Meeting, if needed
 - Stage 3 Consultation
 - Final License Application
 - FERC environmental review
 - FERC issues new license order





Pre-Filing Activity	Deadline/Est. Date
OPC files NOI, PAD, and Request to Use TLP	Dec 10, 2021
FERC Notice of Commencement and TLP Approval	Jan 26, 2022
Joint Meeting and Site Visit	Mar 16, 2022
Stakeholders comment on necessary studies	May 15, 2022
OPC completes studies	Est. Fall 2023
OPC distributes Draft License App and study results	Est. Feb 2024
Stakeholders comment on DLA	Est. May 2024
OPC files Final License Application	Dec 31, 2024

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Project Overview – Rick Hayes

- Project Operations
 - Installed capacity of 904 megawatts (MW)
 - Normal operations
 - Pumping on nights and weekends
 - Daily load following to meet peak demand
 - Spinning and supplemental reserves
 - Support for intermittent solar generation
 - Minimum flow of 1.2 cubic feet per second (cfs) in Heath Creek





Project Overview

1. Upper Reservoir

- 120-foot-high, continuous earth and rock-fill dam
- Approx. 10,000 acre-feet of active storage
- Reservoir and shoreline not accessible to the public

2. Lower Reservoir

- Combination of several dams/structures
- 18,800 acre-feet of storage
- Reservoir and shoreline not accessible to the public

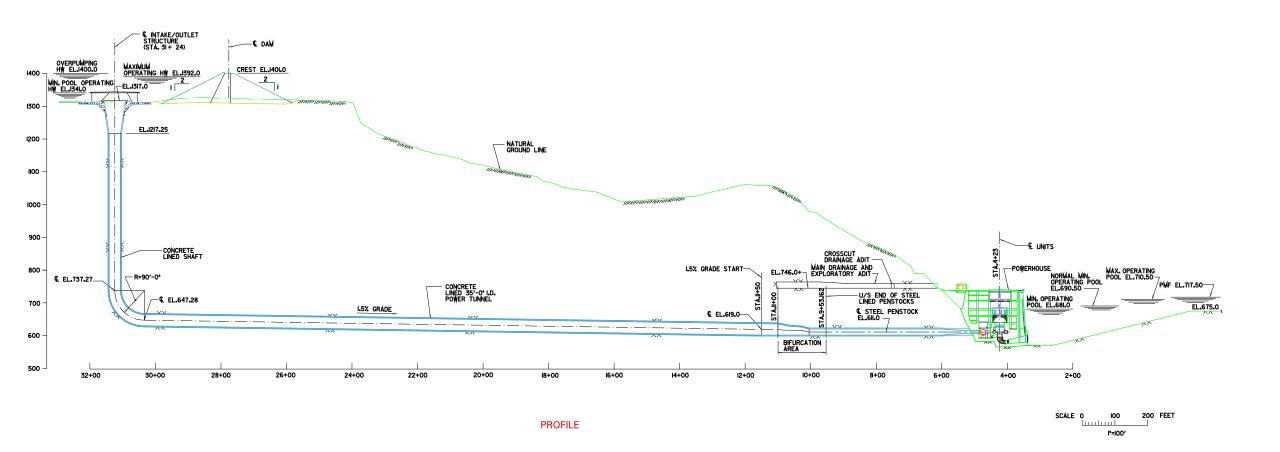
3. Auxiliary Pools

- 2 pools totaling 5,800 acre-feet of storage for recreation and drought reserves
- Accessible to the public for camping, picnicking, swimming, hiking, biking, boating, and fishing



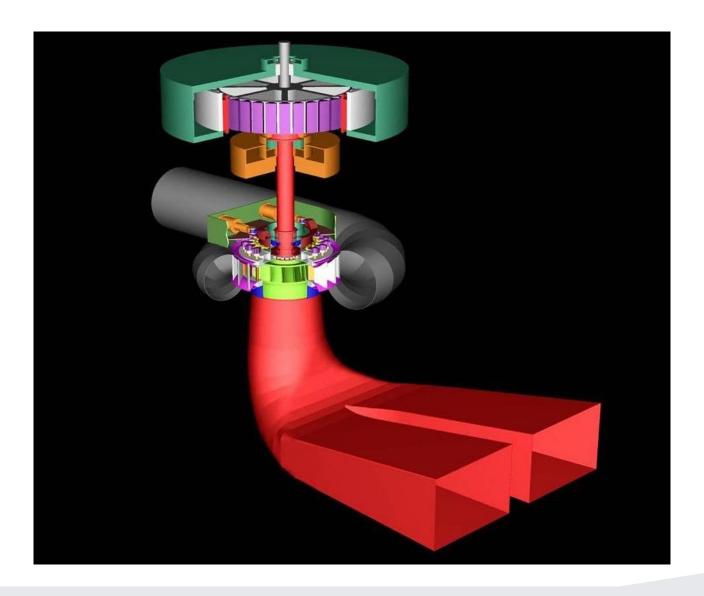


Water Passage Profile



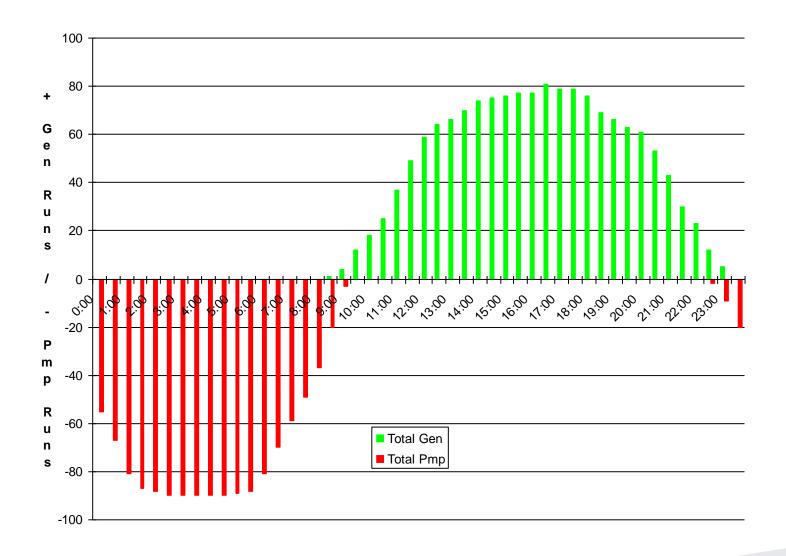


Unit Profile





August Unit Operation



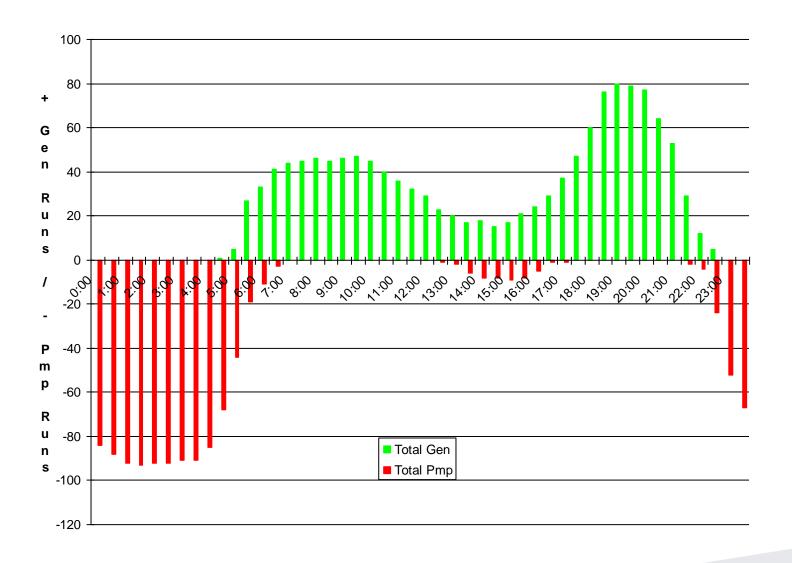


December Unit Operation





March Unit Operation





Virtual Site Tour

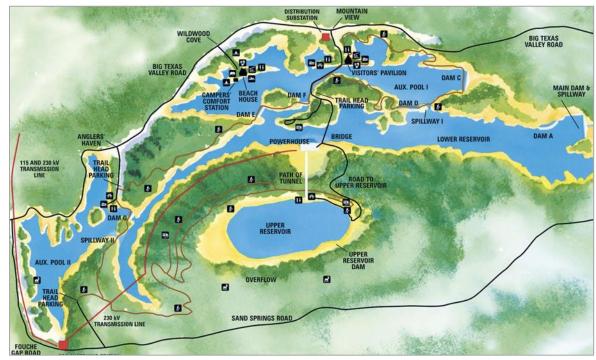
https://opc.com/rockymountainrelicensing/





Project Overview – Rick Hayes

- ► 5,000 acres within the FERC project boundary
- ► 3,700 available for public recreation
 - Visitor center
 - Boat launches
 - Swimming, hiking, biking, picnicking, canoeing, camping
 - Hunting and fishing allowed
 - Restroom facilities
- Wildlife, fish, and recreation resources managed by Georgia DNR







3/16/2022



Overview of Pre-Application Document and Proposed Studies

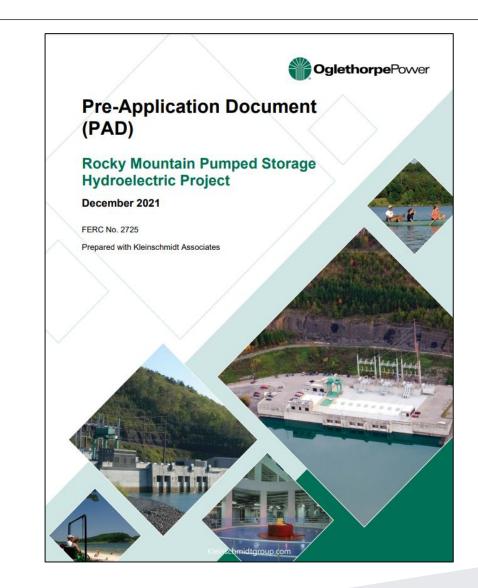
Craig Jones





Pre-Application Document

- Provide detailed project information
 - Information about current and proposed operations
 - Existing information on potentially affected resources
 - Identify information needs
 - Proposed studies
- Substantial amount of existing information
- Purpose of relicensing studies is to fill gaps



3/16/2022



Relicensing Study Requests, 18 CFR § 5.9 (b)

- (1) Describe the goals and objectives of each study proposal and the information to be obtained;
- (2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;
- (3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study;
- (4) Describe existing information concerning the subject of the study proposal, and the need for additional information;
- (5) Explain any nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;
- (6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge; and
- (7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

3/16/2022



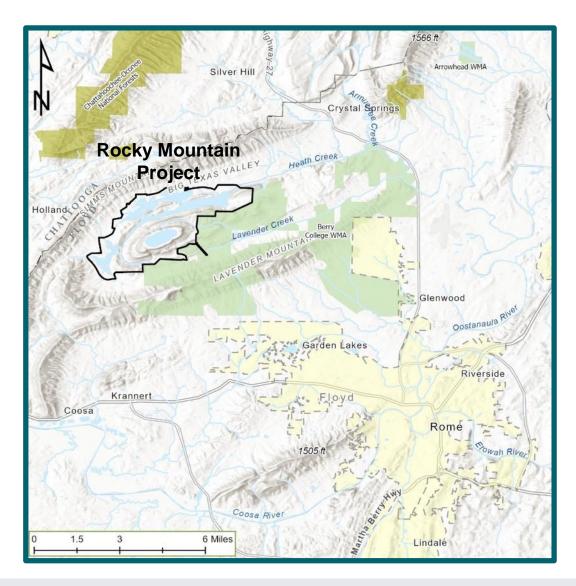
General Description of the Area

Steve Layman, Kleinschmidt





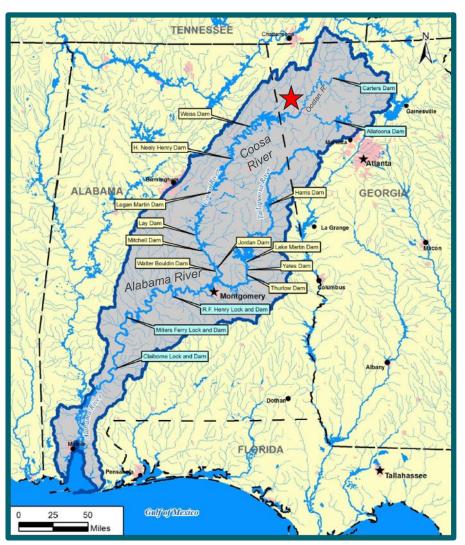
Rocky Mountain Project Location



- ► Floyd County, GA
- ▶ 10 miles northwest of Rome
- ► Ridge and Valley province
- Coosa River basin
 - Heath Creek and Lavender Creek
 - Armuchee Creek tributary system of Oostanaula River

Project Location in Alabama-Coosa-Tallapoosa (ACT) River Basin





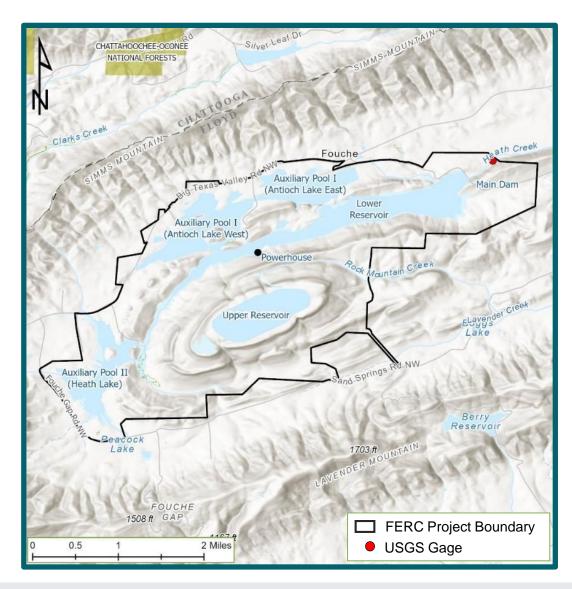
- ► ACT River basin 22,739 sq mi
- ► Coosa River 10,156 sq mi
 - Oostanaula River 2,150 sq mi
 - Armuchee Creek 226 sq mi
 - Heath Creek 16.6 sq mi
- Nine dams on Coosa and Alabama Rivers downstream of Project

★ Rocky Mountain Project

Source: U.S. Army Corps of Engineers (2014)



Rocky Mountain Project Boundary



- Encompasses 5,000 acres of land and water
- Extends to about 0.3 mi downstream on Heath Creek
- Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek



Water Resources

Steve Layman, Kleinschmidt





Rocky Mountain Project Waters



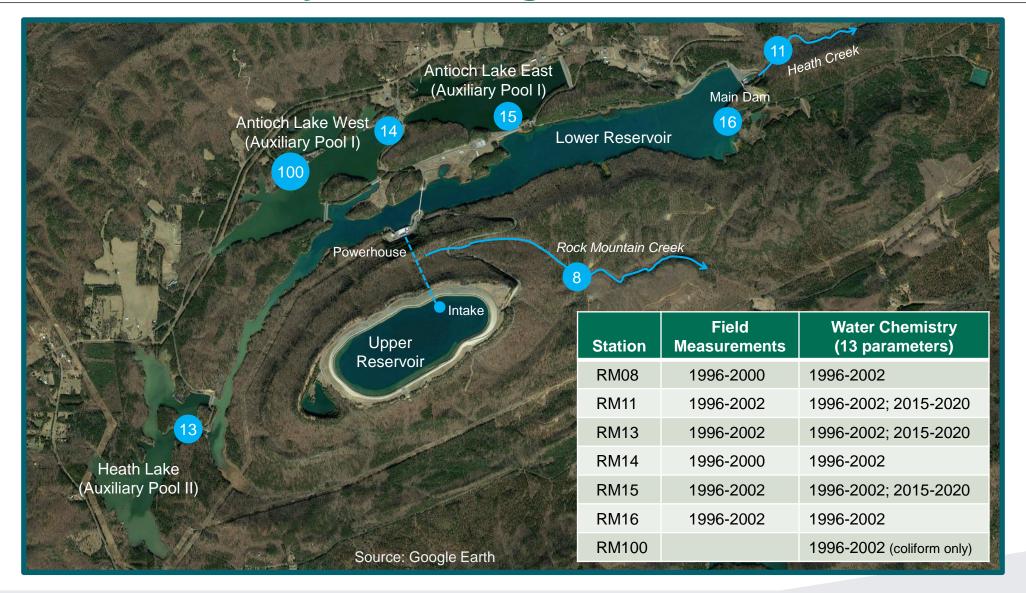


Beneficial Uses of Project Waters

Waterbody	Designated Use	Use Attainability Status
Lower Reservoir	Fishing	(not available for public use)
Upper Reservoir	Fishing	(not available for public use)
Antioch Lake (Auxiliary Pool I)	Recreation	Supporting
Heath Lake (Auxiliary Pool II)	Recreation	Assessment pending
Heath Creek downstream of Main Dam	Fishing	Not supporting due to elevated fecal coliform; nonpoint sources
Rock Mountain Creek (Lavender Creek watershed)	Secondary trout waters	Supporting



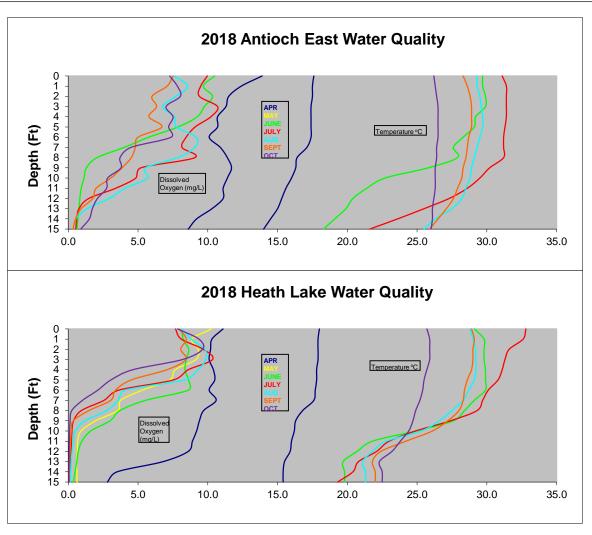
OPC Water Quality Monitoring Data





GDNR Water Quality Monitoring Data

- Auxiliary Pool vertical profiles
 - 2003-2005, 2015, 2017-2018
- Heath Creek monthly sampling
 - 14 water quality parameters
 - 2001 and 2012





Heath Creek Minimum Flow Release Study

- Article 34 of existing license requires OPC to release a continuous minimum flow of 1.2 cfs to Heath Creek
- ► OPC conducted a field study of the minimum flow in 1996
 - Examined effects of four different releases (0.6, 1.2, 2.8, and 8.3 cfs)
 - Measured physical habitat and sampled fishery
 - Continuously monitored dissolved oxygen (DO) and water temperature
 - Lavender Creek used as a reference site for comparison
- ► The 1.2 cfs release maintained DO levels above 5.5 mg/L, which were similar to the levels measured in Lavender Creek
- Study concluded that 1.2 cfs provides sufficient flow to preserve water quality and maintain the resident fish community

3/16/2022



Proposed Study Plan – Water Quality Assessment

Study objectives:

- Characterize existing water quality in the Rocky Mountain study area
- Analyze effects of project operation and maintenance and project-related recreation on water quality in the project area

Study area:

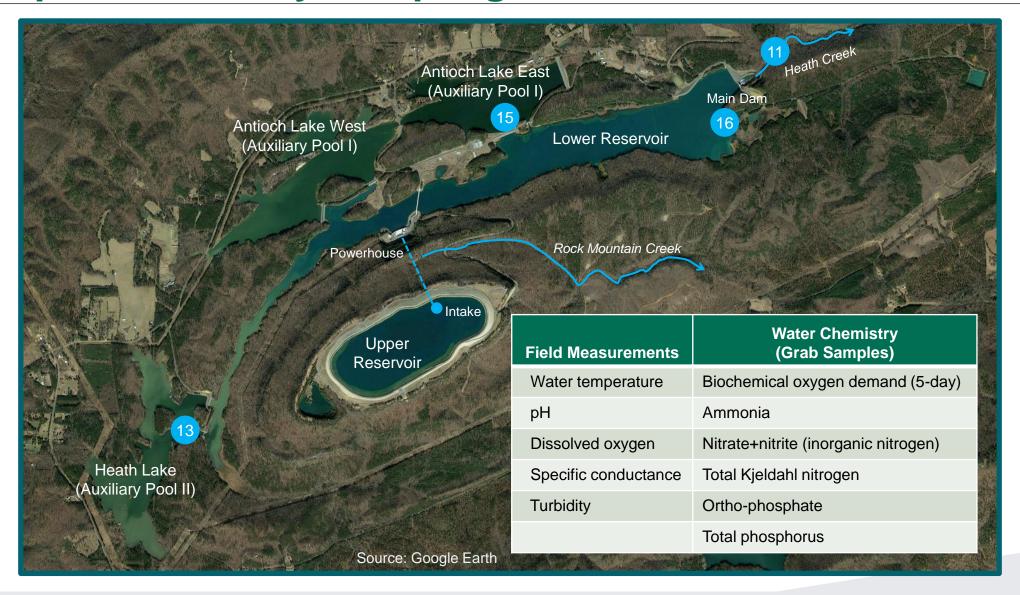
 Lower Reservoir, Auxiliary Pool 1, Auxiliary Pool II, and Heath Creek downstream of the Main Dam within the project boundary

Key study elements:

- Compile and analyze existing water quality data (OPC and GDNR)
- Conduct one year of monthly water quality sampling at four historic stations within the project boundary



Proposed Monthly Sampling Stations and Parameters





Schedule for Water Quality Assessment

Activity	Date or Deadline
Finalize study plan	May-June 2022
Begin data compilation and monthly sampling	May-June 2022
Complete one year of monthly sampling	April-May 2023
Prepare study report	December 2023
File study report with DLA for stakeholder review	Estimated February 2024



Fish and Aquatic Resources

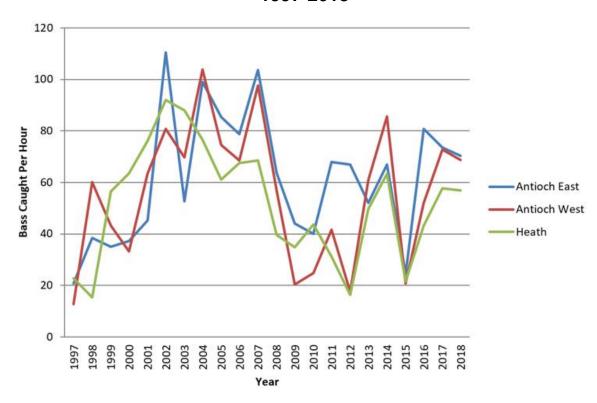
Steve Layman, Kleinschmidt



Rocky Mountain Recreation and Public Fishing Area (PFA)



Largemouth Bass Annual Electrofishing Catch Rates, 1997-2018



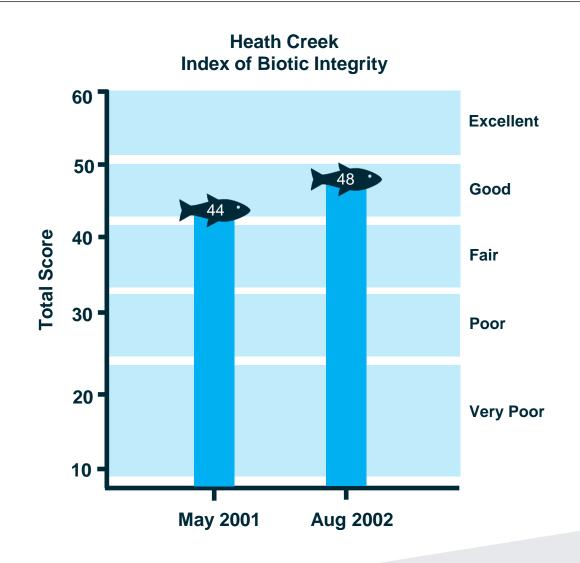
- GDNR manages Antioch and Heath Lakes for public fishing
- Popular fisheries
 - Largemouth bass, bluegill, redear sunfish, black crappie, channel catfish, walleye
- Fertilization rates dictate game fish biomass and fishing quality
- Heath Lake managed as "trophy lake" for largemouth bass

3/16/2022



Heath Creek downstream of Main Dam

- ► Low-gradient, 5-mile reach
- ► About 35 fish species in 8 families
 - Mostly sunfishes, minnows, suckers, darters
- GDNR Stream Team sampling indicated "good" biotic integrity compared to leastdisturbed reference conditions
- No federally or state-listed fish species presently known to occur in Heath Creek
- No diadromous fish species occur in Heath Creek



Aquatic Rare, Threatened, and Endangered (RTE) Species



Scientific Name	Common Name	Georgia Status	Federal Status
Fish			
Etheostoma ditrema	Coldwater darter	R	
Etheostoma rupestre	Rock darter	R	
Hybobpsis lineapunctata	Lined chub	R	
Moxostoma carinatum	River redhorse	R	
Notropis asperifrons	Burrhead shiner	Т	
Freshwater Mussels and Snails			
Elliptio arca	Alabama spike	Е	
Hamiota altilis	Finelined pocketbook	Т	LT*
Medionidus acutissimus	Alabama moccasinshell	E	LT
Medionidus parvulus	Coosa moccasinshell	Е	LE
Pleurobema decisum	Southern clubshell	E	LE*
Pleurobema georgianum	Southern pigtoe	Е	LE*
Ptychobranchus foremanianus	Rayed kidneyshell	E	LE
Ptychobranchus greenii	Triangular kidneyshell		LE
Villosa umbrans	Coosa creekshell	R	Under review*
Leptoxis foremani	Interrupted Rocksnail	E	E
Pleurocera showalteri	Upland hornsnail	R	
Aquatic Insect			
Stenogomphus consanguis	Cherokee clubtail	Т	Under review

- ▶ 17 federally and/or state listed aquatic species potentially occur in the project vicinity
- None are presently known to occur within or near project boundary
- Lack of available sampling records for freshwater mussels and snails in Heath Creek

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^{*} Mussels with historic records in Armuchee Creek watershed



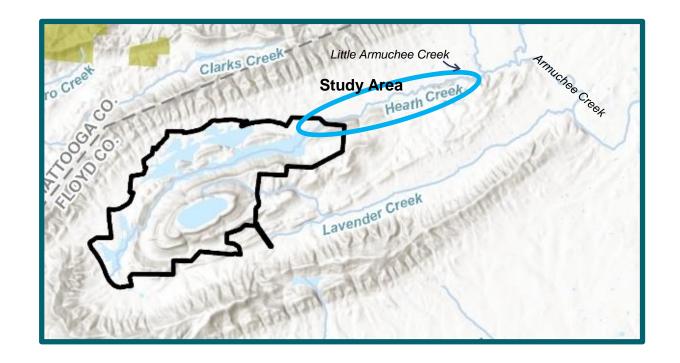
Proposed Study Plan – Aquatic Resources Study

Study objectives:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project
- Analyze effects of continued project operation on aquatic habitat downstream

Study area:

 Heath Creek from Main Dam downstream to Little Armuchee Creek





Proposed Study Plan – Aquatic Resources Study (continued)

- Key study elements:
 - Fish community survey conduct survey at two representative locations on Heath Creek following GEPD's fish community biomonitoring standard operating procedures
 - Sample fish using backpack electrofishing
 - Apply Index of Biotic Integrity (IBI) to evaluate fish community health
 - Mussel survey conduct survey using a search design appropriate for:
 - Representing available habitats
 - Assessing presence/absence of native species
 - Characterizing relative abundance and size characteristics of live specimens encountered



Schedule for Aquatic Resources Study

Activity	Date or Deadline	
Finalize study plan	May-June 2022	
Conduct fish community survey	June-September 2022	
Conduct mussel survey	June-September 2022	
Prepare study report	January 2023	
File study report with DLA for stakeholder review	Estimated February 2024	

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Wildlife, Botanical, and Wetland Resources

Steve Layman, Kleinschmidt





Wildlife and Botanical Resources

- Terrestrial vegetation and wildlife representative of Ridge and Valley province
- Predominant forest types are pine-oak, chestnut oak, and oak-hickory
- One active bald eagle nesting territory within project boundary
- Green salamander, a Georgia rare species, occurs among boulders and cliffs on slopes of Rock Mountain



Photo by John Jensen, GDNR

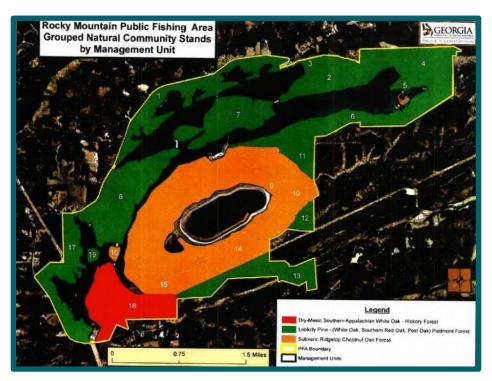


Rocky Mountain Project Natural Communities

 GDNR created Terrestrial Management Plan for upland portions of Rocky Mountain PFA



Vegetation Survey Points



Natural Community Stands



Wetlands, Riparian, and Littoral Habitats

- Wetlands within the project boundary include freshwater forested/shrub wetlands totaling at least 6.75 acres
 - Small, shallow, dominated by trees, shrubs, and emergent vegetation
- About 29 acres of stream habitat within project boundary
 - Narrow floodplains with deposits of sand and clay
- Littoral habitats prevalent in Auxiliary Pools
 - Heath Lake: 33% less than 5 feet deep; 29% with flooded timber
 - Antioch Lake: 19-22% less than 5 ft deep; 1-2% with flooded timber



Federally Listed Terrestrial Species in Project Vicinity

- ► No federally listed species presently known to occur at Project
- ► Bald eagle (state threatened) resides in project area

Scientific Name	Common Name	Georgia Status	Federal Status
Plants			
Arabis georgiana	Georgia rockcress	Т	LT
Clematis socialis	Alabama leatherflower	Е	LE
Helianthus verticillatus	Whorled sunflower	E	LE
Marshallia mohrii	Mohr's Barbara's-buttons	Т	LT
Scutellaria montana	Large-flowered skullcap	Т	LT
Xyris tenneseensis	Tennesee yellow-eyed grass	Е	LE
Insect			
Danaus plexippus	Monarch butterfly		С
Mammals			
Myotis grisescens	Gray bat	E	LE
Myotis septentrionalis	Northern long-eared bat	Е	LT



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Proposed Study Plan – Terrestrial and Wetland Resources Survey



Study objectives:

- Describe existing terrestrial wildlife and botanical resources, and floodplain, wetlands, riparian habitats, and littoral habitats occurring in representative habitats
- Identify potentially suitable habitats for RTE species of plants and wildlife, and identify invasive species

Study area:

 The project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek

Proposed Study Plan – Terrestrial and Wetland Resources Survey (continued)



- Key study elements:
 - Conduct a field reconnaissance survey in spring/early summer, primarily by boat along shorelines of the project waters and by pedestrian surveys of project recreation areas
 - Characterize available habitats and representative plant and animal species
 - Identify unique or sensitive habitat types that may harbor rare plant or animal species
 - Identify invasive species
 - Prepare a map of the project boundary delineating principal vegetation community types, including wetlands
 - Based on GDNR (2013) vegetation surveys and ground-truthing of aerial photography interpretation



Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline	
Finalize study plan	May-June 2022	
Conduct field reconnaissance surveys	April-September 2022; April 2023, if needed	
Prepare study report	June 2023	
File study report with DLA for stakeholder review	Estimated February 2024	



Recreation Resources

Kelly Kirven, Kleinschmidt





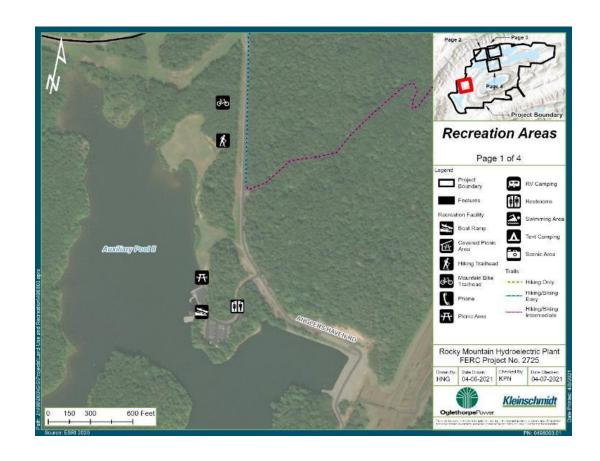
Recreation Resources

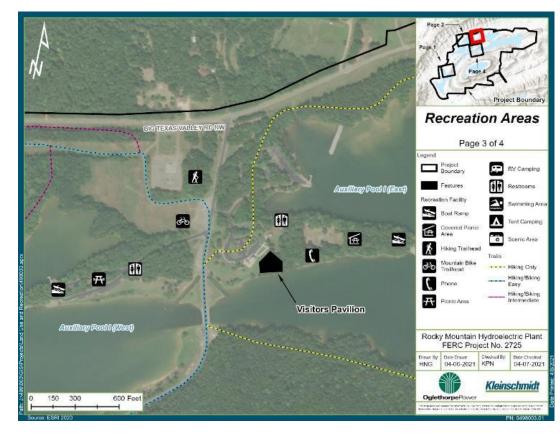
- 3,700 acres of land and water available for public recreation activities at the Rocky Mountain Public Fishing Area (PFA)
 - Auxiliary Pool I (includes Antioch Lake East and Antioch Lake West)
 - Auxiliary Pool II (Heath Lake)
- No recreational use on the Upper and Lower Reservoirs and associated shorelines
- GDNR manages and operates the Project recreation facilities through the MOU





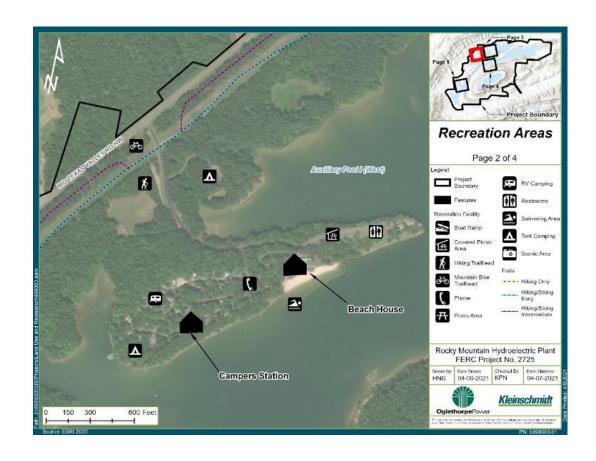
Recreation Resources

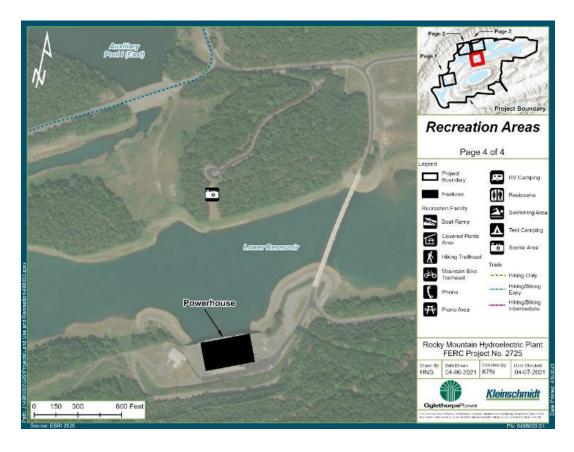






Recreation Resources (continued)







Auxiliary Pool I

Antioch Lake East

- Day Use Facility with Parking, Picnic Area, Group Shelter, Boat Launch, Floating Dock, Restrooms
- Visitor Information Center



Antioch Lake West

- Swimming Beach with Sand Beach, Bathhouse, Restrooms
- Picnic Area with Group Shelter, Tables, Grills
- Boating Area with Parking, Concrete Boat Launch, Courtesy Dock, Picnic Area
- Family Camping Area
- Group Camping Area





Auxiliary Pool II

Heath Lake

- Parking
- ► Concrete Boat Launch
- ► Family Picnic Area
- Vault Toilet
- Trailhead Parking and Trails





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PFA Recreation Use

GDNR Attendance Records at the Rocky Mountain PFA, 2015-2021

Монтн	2015	2016	2017	2018	2019	2020	2021
January		3,520	13,448	10,508	9,700	10,287	11,838
February		4,200	16,670	14,794	10,448	12,333	10,494
March		32,304	2,3729	20,769	25,447	32,576	25,432
April		48,035	49,622	21,244	29,532	50,265	31,080
May		57,641	39,169	41,165	55,855	69,410	40,249
June		60,803	42,616	138,021	40,936	48,801	56,062
July	39,269	51,462	36,518	44,377	50,304	26,997	
August	36,044	27,829	27,529	27,606	28,156	21,561	
September	18,451	22,588	21,432	23,186	29,210	23,033	
October	22,537	29,256	23,444	22,723	21,889	21,489	
November	12,683	18,559	13,002	13,296	15,025	16,871	
December	9,310	10,361	10,291	5,752	5,827	5,672	
Total	138,294*	366,558	317,470	383,441	322,329	339,295	175,155*

^{*}Total numbers for 2015 and 2021 do not include a full year of attendance data.

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Proposed Study Plan - Recreation Use Analysis

Study objectives:

 Characterize existing facilities and use through existing information, recreation user groups, and field activities

Study area:

- Rocky Mountain PFA (Auxiliary Pool I, Auxiliary Pool II, other recreation areas within the project boundary)
- Key study elements:
 - Review and analyze existing information (2015 Form 80 and GDNR data)
 - Interview targeted user groups
 - Rome-Floyd County Comprehensive Plan

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Schedule for Recreation Use Analysis

Activity	Date or Deadline	
Finalize study plan	May-June 2022	
Begin data compilation	June 2022	
Conduct interviews	July-November 2022	
Analyze data	December 2022-March 2023	
Prepare study report	April-July 2023	
File study report with DLA for stakeholder review	Estimated February 2024	

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Cultural Resources

Kelly Kirven, Kleinschmidt





Cultural Resources

- Numerous cultural resources studies completed between 1972 and 1996
- Archaeological monitoring conducted in 2020 by TRC

Archaeological Properties Listed in the 1997 Cultural Resources Management Plan for Preservation

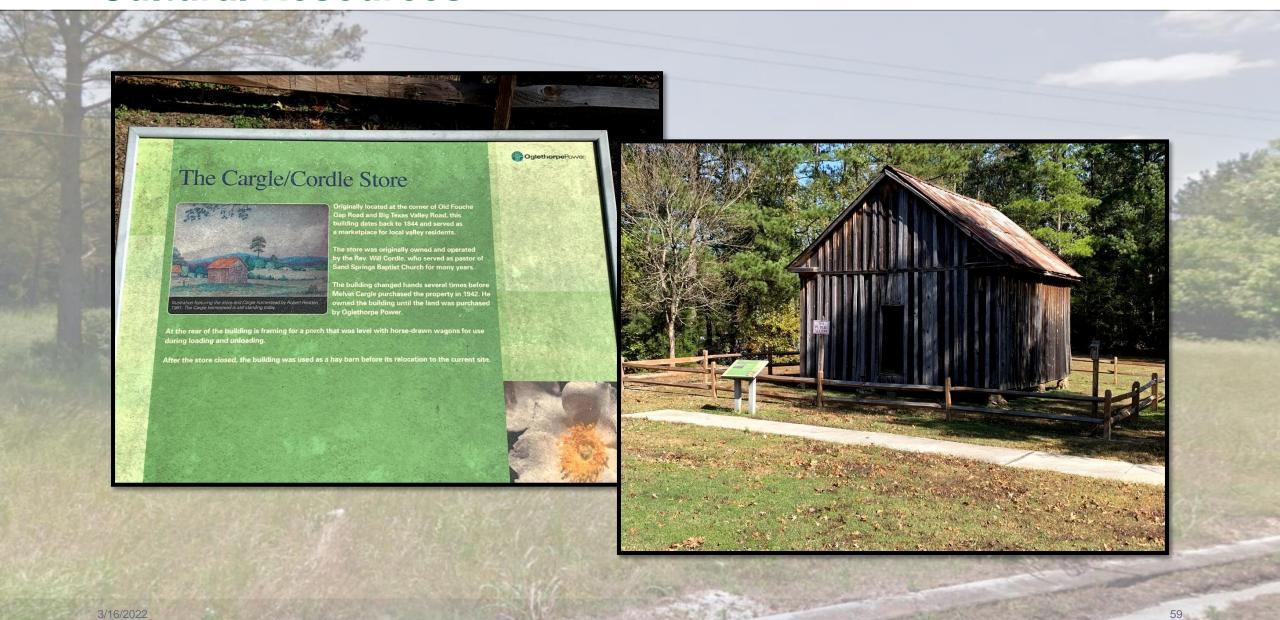
Site Identification	Site Name	NRHP Eligibility
9FL80	The Fouche Mill Property	Not Recommended
9FL106	The Reed/Milam Property	Recommended
9FL108	The Cargle Property	Not Recommended
9FL138	The Fisher House	Recommended
9FL148	Fouche/Hardy Farm	Not Recommended
GP-FL-14*	The Clarence Montgomery Farm	Not Recommended
9FL108	The Cordle Store	Recommended

^{*}State Site Number Not Assigned

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Cultural Resources





Proposed Study Plan – Cultural Resources Assessment

- Study objectives:
 - Identify and summarize known historic properties (lit search, site file review)
 - Conduct a field survey to identify newly qualified historic structures (e.g., the Rocky Mountain powerhouse, other project features) and determine NRHP eligibility
 - Archaeological survey for site (GP-FL-14/CRFL14)
 - Evaluate potential for effects
- Study area:
 - Area of Potential Effect (APE)
- Key study elements:
 - Consultation with GHPD and FERC throughout
 - Modify existing CRMP into a new HPMP

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Schedule for Cultural Resources Assessment

Activity	Date or Deadline	
Identify APE	May-June 2022	
Finalize study plan	June 2022	
Conduct literature review	June-August 2022	
Conduct field survey	August-October 2022	
Conduct archaeological survey	August-October 2022	
Prepare study report	November 2022-March 2023	
File study report with DLA for stakeholder review	Estimated February 2024	

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Next Steps in the Relicensing Process Craig Jones





FERC Relicensing Process

- Traditional Licensing Process
 - Three formal stages of consultation
 - Stage 1 Consultation
 - Notice of Intent/Pre-Application Document/Request to Use TLP
 - FERC Notice of Commencement/Approval of TLP
 - Joint Meeting
 - Written comments on studies
 - Stage 2 Consultation
 - Conduct studies
 - Distribute Draft License Application
 - Written comments from interested parties
 - Joint Meeting, if needed
 - Stage 3 Consultation
 - Final License Application
 - FERC environmental review
 - FERC issues new license order



Public Comments



Public Meeting

	Page 1
1	ROCKY MOUNTAIN PUMPED STORAGE HYDROELECTRIC PROJECT
2	FERC RELICENSING (P-2725)
3	JOINT MEETING AND VIRTUAL SITE TOUR
4	
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7	Moderated by Craig Jones
8	Wednesday, March 16, 2022
9	2:01 p.m.
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12	Remote Proceeding
13	Roswell, GA 30075
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18	Reported by: Deidra Musick Nash
19	JOB NO.: 5133017
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Public Meeting

Page 2 1 APPEARANCES List of Attendees: 2 Craig Jones, Director of Environmental Policy with 3 Ogelthorpe Power (by videoconference) 4 5 Steven Layman, Aquatic Biologist Project Manager for Kleinschmidt (by videoconference) 6 7 Tyler McCaslin, Environment Specialist with Ogelthorpe Power (by videoconference) 8 9 Rick Hayes, Plant Manager for Ogelthorpe Power (by 10 videoconference) Wei Zeng, Georgia EPD (by videoconference) 11 12 John Faustini, Fish and Wildlife (by videoconference) 13 Jackson Sibley, GDNR Fisheries Biologist (by 14 videoconference) Kelly Kirven, Kleinschmidt (by videoconference) 15 16 Jim Hakala, GDNR (by videoconference) 17 Ben Murray, Rome-Floyd Chamber of Commerce (by videoconference) 18 19 Heather Teilhet, Ogelthorpe Power (by videoconference) 20 Toni Presnell, Ogelthorpe Power (by videoconference) 21 22 23 24 25

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Public Meeting

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4	Mr. Tyler McCaslin	17
5	Mr. Rick Hayes	19, 29
6	Mr. Steven Layman	33, 44
7	Ms. Kelly Kirven	56, 67
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PROCEEDINGS

MR. JONES: So good afternoon, everyone, and welcome to our Rocky Mountain Relicensing meeting and virtual site tour. I'm Craig Jones and I'm the Director of Environmental Policy with Ogelthorpe Power and I'm going to be your host and facilitator for today's meeting. I do want to say up front that this meeting is being recorded and transcribed for our -- for our records and for our consultation record for FERC.

So Jeffrey, if you haven't already done so, would you please start the recording now?

So today's joint meeting is being held as part of the federal relicensing process of Rocky Mountain. I know many of you are familiar with that process, some of you are not, some of you are less familiar, so we're going to -- to be able to provide an overview for you today of what that -- what that entails and then really get into the meat of the meeting. The -- but what I do want, a couple of housekeeping things that I do want to address up front and then we'll get rolling into it is that first, everyone as -- as I'm sure you're familiar now is -- is muted and your cameras are turned off upon joining the webcast and I'm going to ask everyone to

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remain muted while you're not speaking.

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That being said, because we are looking forward to an interactive meeting today, please take yourself off mute and turn on your camera, if you like, at any time to ask questions or -- or make comments. Because we do -- we definitely do want to have an exchange of -- of information throughout this meeting and -- and a good discussion. You can also raise your hand by using the little, at the bottom of your screen, the little hand signal down there. You can click on that and raise a question and we're having the -- will be monitoring it so we will -- the question. And there will also be specific opportunities where we'll pause the -- pause for discussion during the course of the meeting in particular during the -- the discussion of the resource areas, but really if you've got questions throughout the -- throughout the presentation and meeting today, please do not hesitate to ask. And finally, today's meetings slides and the video will be posted to our relicensing website following the meeting.

And Eric, if you haven't done so, would you go ahead and just drop that link into the chat now so that everybody has that?

Page 6 1 And then Tyler, Steve, Kelly, did 2 I -- did I miss anything? 3 MR. LAYMAN: I don't think so. That's good. 4 5 MR. JONES: All right. Thank you. So I am going to take control of the 6 7 slides so that I can advance them. There we go. here's our agenda for today's meeting. 8 9 As part of the federal relicensing 10 process that -- that we'll be talking about in a few 11 moments, we are -- we're required to conduct 12 consultation meetings with agencies, tribes, and the 13 public about the project and the effect on the environment. So we began that effort with the filing 14 15 of our Pre-Application Document which we'll be 16 discussing throughout today's meeting, of course, and 17 today we're continuing with an in-person meeting, sort of, this is the best we can do for now and -- and a 18 19 virtual site tour. We do plan to -- to maybe have a -- a real site tour at some point in the -- in the 20 21 near future and we look forward to the opportunity to 22 do that. But today's meeting is to really have an 2.3 active discussion for the Pre-Application Document. 24 And since interactions are challenging in a virtual forum like this, what I'm going to do is 25

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I'm going to ask you to drop your name and affiliation into the chat rather than just doing a round robin. That way, we'll have a full record for the transcript and you all can see who's attending. I'll ask for the recording -- I will ask for the recording and transcript that if you do speak during the meeting, please begin with your name and affiliation so that we can capture that for the recording and transcript as And I know I've got -- so I've got Heather Teilhet from -- from Ogelthorpe on the phone and I believe Toni Presnell is on the phone from Ogelthorpe as well, so -- so Tyler or -- actually, Eric, would you please drop their names into the chat so that -- so we've got that for the record. And then if there's anybody else on the phone, would you please break in and -- and let us know? Okay. So hearing none, we'll -- we'll begin today's presentation with a -- with a brief history of Rocky Mountain, an overview of the relicensing process, project operations, a virtual site tour, an overview of the resource areas that are described in the Pre-Application Document and how they informed our relicensing study proposals, which is really where we'll provide plenty of opportunity to ask questions and provide any feedback that you have

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today. We'll then talk briefly about next steps and provide an opportunity for public comment.

This meeting is scheduled to run from two to four today, but we don't have a hard stop at four since we want to make sure that we're able to sufficiently address any -- any questions or comments or recommendations for us that -- that come up during the course of today's meeting related to our study proposals. If -- if we have participants from the public on or anyone else for that matter who would like to make public comment but needs to drop off at a specific time, please let us know now if you -- you know that. That would be -- that would be great. Or just drop a note in the chat and we'll pause the meeting at a good time so that you can provide comment.

If you prefer, because we are in this virtual forum, you could even drop a public comment in the chat and we'll make sure that that shows up in the public comment section in the transcript. So if that's easier for you and you prefer to do that, that is going to work just fine. We'll talk -- we'll talk a little bit more about this later, but there will also be opportunities to provide written comments after today's meeting. So again, more on that to

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come.

All right. So as far as the diving into and I just -- I guess what I'll do is I'll just pause right there to see if -- if at this point in the -- in the meeting anybody has any -- any questions that we need to clarify or anything along those lines? Great.

So first, and the reason that we are here today is that Rocky Mountain is licensed by the Federal Energy Regulatory Commission or FERC, more on what that means in -- in a moment. But first, the project license is -- basically includes the -- the terms and conditions for -- for owning and operating the project, including, among other things, how it operates, any dam safety requirements, things like recreation access, measures to protect, mitigate, or enhance the environment, recreation and cultural resources that -- that are affected by project operations. So that's -- that's really what -- what a license is and Rocky Mountain was originally licensed for a term of 50 years to Georgia Power Company in 1977.

Ogelthorpe -- Ogelthorpe Power subsequently acquired the majority share, about 75 percent of that project, from Georgia Power in 1988

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and we retain the responsibility for all aspects of project operations, including licensing which is, again, why we're -- why we're here today and we're -- we're going through this consultation process and this relicensing process. The project began operating in 1995 and shortly after that, we entered into an agreement with Georgia Department of Natural Resources to manage the recreation, fish, and wildlife resources associated with the project that are all within -- situated within the project boundary. And I do want to just pause and just mention that that has been a really productive and good working relationship with DNR and it is -- it's one of the reasons why we were able to have a lot of good information in the Pre-Application Document so we -- we appreciate that partnership and appreciate working with GDNR over -- over all these years. The license was amended in 2005 to increase the project's capacity. That allows us to deliver more power, basically, with the same amount of water. And Rick, if that's overly simplified or not right, you can, you know, just ask you to clean that up later if I -- if I got anything wrong.

December 31, 2026, is -- marks the end of our 50-year license term. If we want to continue

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operating the project, and we do, we are required to file an application for a new license by December 31, 2024. Once we file that application, FERC will conduct its own review, review for completeness and an environmental review, and issue a new license order. If -- if FERC doesn't issue the new license order by December 31, 2026, they will automatically issue annual licenses until -- until they're able to issue a new license, which basically means that we continue to operate with the terms and conditions of the existing license until FERC issues -- issues a new one. new license application will include findings from our relicensing studies, along with basic project information and -- and those findings for the relicensing studies will help identify those project-related effects that will be addressed in -- in a new license order.

All right. So just a few words about -- about FERC jurisdiction here. FERC has authority by statute to license and regulate all non-federal -- all non-federal hydropower projects on navigable waterways and non-navigable waterways where there's power in -- the power that's sold in -- in interstate commerce and that's a lot of words and may not be very helpful, but basically, what that means is

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that -- that that, the main point in that is that FERC has jurisdiction over our relicensing process. And including making any -- making decisions on a new license order.

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FERC can issue a new license for a period from between 30 and 50 years, but current FERC policy is to default to a term of 40 years for a new license order and then make adjustments up or down depending on the case-specific information. issuing a new license, FERC is required to give equal consideration to power and non-power values. means, you know, FERC is not -- it's not necessarily a balance, but it's -- but FERC has to take a hard look through the NIPA process and then -- and then look very carefully at both the power and non-power values and -- and consider those equally and come up with a decision on -- on a new license order and -- and through that process, applicants are required to develop information transparently, which is a part of the reason why we're here today, by consulting with -- with agencies and tribes and the public.

The relicensing process, it really begins with the filing of -- of a Notice of Intent to seek a new license and a development of a Pre-Application Document. We filed that with the

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commission both the NOI and -- and the PAD on December 10, 2021, and as I've mentioned, the PAD includes all that -- all that resource information that we're going to be talking a lot about today. Our NOI also included a request to use the traditional licensing process and FERC granted the use of that on January 26th twenty -- on January 26th of this year.

I'm not going to address the other re-licensing process options that were -- that were out there, but I'm happy to answer any questions about them now, or if you'd like to chat about later. the next slide, I'll talk a little bit more about a high level what the -- what the traditional licensing process looks like. So I'll just pause right there to see if there are any -- any questions about any of the project history that I've covered to this point or the -- the high-level FERC relicensing process that I've -- I've just -- just only touched on.

Okay. Moving on to the next slide, then. There we go, okay, good.

So I'm not going to spend a lot of time on -- on this slide either and the process, but I do just want to give you a sense more for what it entails over the next or the coming several years.

Relicensing is a -- it's a long-term process, several

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years in the making because we do have to pull together a lot of environmental information, technical information associated with the license application, so I do want to just highlight some things and where we're currently at in the process. Generally speaking, there are three stages of formal consultation where we provide information and we hold meetings like this to discuss that information and then ask for -- for comments and have a dialogue about -- about these issues.

As you can -- as you can see by the bold text, we're currently in the first stage of consultation and holding our joint meeting. As we've been discussing, this stage is focused on identifying information about the project and the effect in the environment and especially gaps in the information that will help inform the relicensing studies and ultimately FERC's decision on -- on what to include in a new license order. So really, all this is intended to provide information that the FERC needs in order to make licensing decision. And then following today's joint meeting, there -- there will be a 60-day period for filing written comments and Eric has dropped in the information for how to do that in the chat. You can either send a hard copy to FERC to the secretary

of the commission, or you can go online and -- and file online.

And then we also ask that when you do that, that you go ahead and copy us and you can copy -- you can send that directly to me, my address is in the chat box, too. You can also just send an e-mail with a -- with a PDF of the -- of the -- of any comments that you -- that you provide. So Tyler's going -- Tyler McCaslin is going to provide more detail on -- on some of these specific dates that we'll get into momentarily. So anyway, that's the first stage of consultation. That's where we're at today.

The second stage of consultation, we will be conducting the studies that we are proposing to do and -- and those studies will form the basis for the environmental information that -- that will be included in the draft license application. And then we'll distribute the Draft License Application for another round of reviewing comments and -- and there's also a joint meeting associated with that to attempt to resolve any disagreements to the extent that there are any. We may, you know, we may go through this process and -- and find that we're -- we're in a pretty good place with respect to what the -- the new

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license term looks like. That is just coincidentally or just incidentally, I'll just mention that -- that that is one of the reasons that FERC granted the use of the traditional licensing process is because with -- with this project, the -- the scope of the issues and complex of the issues and the -- and really any -- any conflict associated with the issues was -- was really, if it's -- if it's there, it's very small and -- and what that means is that we can go through this process efficiently.

So that's how FERC treats the traditional licensing process and that's why we're in that category. So you know we may -- we may very well get to the end of this and find that we're in a -- in a good place as far as agreeing on -- on what that new license term looks like.

And then as far as the third stage of consultation, that begins after we file the Final License application with FERC. That process is really, it's a FERC driven process and it's focused on their own review for completeness, as well as the environmental review that they're required to do under the National Environment Policy Act. And so finally, I do want to just end with this thought is that these are just the minimum opportunities for formal

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consultation that are required by the regulations.

I'll be talking about some additional opportunities
to -- to informally engage in consultation that we
believe is an important part of the process and which
I'll touch on when we -- when we talk about the next
steps toward the -- toward the end of the meeting and
in this presentation.

So now Tyler, I'm going to turn this

over to you for -- for time-wise. But there -- there they are and I just -- I also just want to just pause there too to see if there are any questions about -- about the re-licensing process that I can -- that I can answer at this time.

Okay. Tyler, go ahead.

MR. MCCASLIN: Well, good afternoon, everyone. My name is Tyler McCaslin and I am an Environmental Specialist with Ogelthorpe Power. I've been assisting these relicensing efforts throughout the process.

We're going to cover our high-level schedule and major project milestones. So as you all know, we kicked off the relicensing process on December 10th last year with our filing of the Notice of Intent, Pre-Application Document, and request to use the TLP with FERC. FERC issued their notice of

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commencement and approval of our request to use the TLP on January 26th. So with our joint meeting today, there is a 60-day period for stakeholders to comment on the proposed studies that you will be hearing about later in the presentation. These studies will be performed throughout this year over -- over a variety of seasons depending on the resource area, and we're anticipating completing these studies and compiling all the study reports by fall of 2023. We're expecting to have a Draft License Application around February of 2024 and from there, there is a 90-day period for stakeholder comments and the filing deadline for the Final License Application with FERC will be December 31, 2024, which is two years prior to the license expiration date.

MR. JONES: And -- thanks, Tyler.

So now, as Rick gets control of the -- the presentation, I'll just queue him up for an overview of the project operations.

Rick, are you ready? If we advance just a few slides. We'll get -- there we go. Back at the start.

MR. HAYES: There you go, unmute me, there we are. I've unmuted myself.

MR. JONES: Okay. Rick --

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1 MR. HAYES: I was a little lost there 2 but that's -- I got it. 3 MR. JONES: Okay. Great. 4 MR. HAYES: I'm Rick Hayes -- my name 5 is Rick Hayes, I work for Ogelthorpe Power Corporation. I am the Plant Manager at the Rocky 6 7 Mountain Pump Storage Hydroelectric Plant. I'm here to kind of give you a kind of a project overview as to 8 9 what Rocky is all about and -- and what we do here. 10 So we have an install capacity of 904 megawatts. As Craig said, back in 2005 we did a -- a 11 12 license amendment to increase our capacity. We ended 13 up doing our ten-year overhauls which is part of our plan to maintain Rocky Mountain. And at that time, we 14 replaced the water wheels, which we call the -- our 15 16 runners with more modern designed runners which gave us the increase in performance power, pumping -- our 17 pumping flow and so forth and so on. So we took that 18 19 opportunity, finished those up in 2011 and have been 20 at that 904 megawatts plant -- plant capacity since. 21 Normal operation for a pump storage 22 plant, we pump nights and weekends, basically 23 generating the day, generate on weekends as needed.

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have spinning and supplemental reserves as another one

We do daily load following to meet peak demand.

24

of the benefits we provide to the system. I have a slide here in a little while, or a couple slides here in a little while, that kind of show you our low profile.

To say we just pump at night and generate during the day hasn't been typically exactly how we've operated. We operate to maintain peak efficiency at some of our other generating facilities that we're partners with, nuclear and coal, so that's -- that's kind of how it's been. We have, most recently, seen us pump during the day to support solar generation where we would have excess solar generation they've turned to pumps at Rocky on, pumped water up the hill. You'll find that there is no better battery to store solar generation than a pump storage plant. Clean, renewable, pump it up and then save it as water stored at a higher elevation and then let it pass through the turbines and generate electricity.

We have a minimum flow requirement. Heath Creek flows into our property, enters into Aux Pool 2 which most people may know as -- as Heath Lake. Heath Lake then spills into our Lower Reservoir and that Lower Reservoir is contained mainly down at our Main Dam, and from our Main Dam, we have to -- we are required 24/7, 365 days a year, to pass 1.2 cubic feet

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per second down Heath Creek. So Heath Creek sees a -- a constant flow of at least 1.2 cfs every day.

So next slide, just to kind of give you an idea of the main makeup of the project, you have the Upper Reservoir. It's 120-foot high, continuous earth, rock-filled dam. We have approximately 10,000-acre-feet of active storage.

Active storage is the water that we actually use to generate electricity and basically, we move 10,000-acre-feet back and forth, back and forth, back and forth, and what this -- what this does is we're trying to wear it out. Haven't done it yet, but we do get to use that 10,000-acre-feet passing between the Upper and Lower Reservoir. Reservoir -- the Upper Reservoir is -- and shoreline is not accessible to the public because it does fluctuate in elevation or depth by 51 feet.

The Lower Reservoir is a combination of several dams and structures. The main one is the Main Dam. It has our -- our release, water release areas down there. The Lower Reservoir is about 19,000-acre-feet of storage. The reservoir and shoreline are not accessible to the public.

And we have Auxiliary Pools, two of them. They total about 5800-acre-feet and this is for

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storage for recreation and for drought reserves. So if we had to, we could, you know, take water from either one of the Auxiliary Pools. You may know them as Antioch Lake East and West and then Heath Lake. can take water from them and pass them into the Lower Reservoir to make up water for evaporation.

In the 25-26 years that we've been operating the plant, we have never had to do that. We have managed our water in a manner that we have not had to take any of that water from those two -- two ponds to make up any kind of volume for generation. It's -- those are accessible to the public. We have camping, picnicking, swimming, hiking, mountain biking, boating, and fishing. And I will say that I've heard many people say that it's one of the best fishing areas in Georgia if not the Southeast if not the country. We have quite a few large bass caught, it's a very popular place in the area.

This gives you a profile of what the water passage or the tunnel that runs from the Upper Reservoir down to the Powerhouse looks like. starts off at a intake structure 140 feet wide by 25 feet tall. It runs down a vertical tunnel about 35 feet in diameter, makes a turn, comes down through the mountain about a mile, and then it bifurcates, goes

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down to Unit 1 and then that bifurcate -- the other bifurcation bifurcates again and goes down to Units 2 and 3. We have three units here at Rocky.

This is a kind of a 3D rendering of a typical pump turbine. You can see the draft tubes in red. As you come up, you see the turbine -- pump turbine itself. And up through the motor generator at the top.

All right. So we talked about, you know, how we generate and how we pump. If you look at this, this is a typical August month. Unit operation red is pump, green is generate. As you can see, we're generating at night when demand is low. We are then turning it around in the morning after that and we're starting to pick up load and generate mode, hitting the peak about five o'clock. What happens we start to see a lot more air conditioning load, industrial loads pick up and so forth, and then you can see it that it tails off towards the end around eleven -- ten, eleven, twelve o'clock at night and then we start the cycle again, pump -- back to pumping to recharge the reservoir, Upper Reservoir.

Here you see a December and as you can see, there are times in December where we generate at -- or we pump at night, we hit that morning peak,

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start to see people get up, get ready for work, go to work, so forth and so on, but we don't have that air conditioning running in the middle of the day and so in order to keep, as I said, there are nuclear and fossil plants at peak efficiency, they'll take us and pump that water back up. Also, recharging up the reservoir to make it ready for any peak demands that we might see in the afternoon. You can see about five o'clock people start to come home, start to cook dinner, start to get, you know, watch TV and so forth. And then about ten, eleven o'clock they start to go to -- to bed and we start to pump again. As -- as the -- or the power's available.

And this is a typical March for us as well. Once again, you'll see we have a -- a pump mostly at night. We have that morning peak that tails off. We may pump a little bit in the afternoon between two o'clock and four o'clock and then people start to head to house and start to cook dinner and watch TV and all the things they love to do and pump at night. So that's kind of a -- kind of a typical profile what you would see at Rocky Mountain and how we operate.

So any questions I can answer? I'll be glad to answer them.

1 MR. JONES: Great. Thanks, Rick. so as -- as Tyler is queuing up the -- our virtual 2 site tour, I just want to make another plug and 3 another announcement on that that we are going to send 4 5 out a notice to our distribution list and for those of you who are -- are joining us today for the -- for the 6 first time and haven't been on our distribution list, 7 we're also going to include you on that invitation as 8 9 well so that we can -- so that we can do a -- a real, 10 on the ground tour in the -- in the near future. So 11 be on the lookout for that. 12 Tyler, are you -- are you ready? 13 Great. 14 (Video played.) 15 MR. JONES: And then are we 16 going -- Tyler, are we going back to Rick to wrap up? 17 Just while we're -- while we're transitioning slides, I do want to mention also that if anybody had 18 any -- any audio or video trouble seeing that video, 19 we are going to have it posted, like I mentioned 20 earlier, on our website so you'll be able to see the 21 full video, and I do just want to give a shoutout to 22 our corporate communications team we've got. 23 That's -- that was well done. 24

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MR. MCCASLIN: Well, we do have three

1 | questions in chat so --

2 MR. JONES: Okay.

MR. MCCASLIN: -- I think they were

mostly addressed to Rick. So if you'd like to unmute,

Rick, would you like me to read out the questions

aloud?

MR. HAYES: Yeah, that'd be, that'd be great, Tyler.

MR. MCCASLIN: All right. So from Wei Zeng, Georgia EPD, the first question is: What is the drainage area draining into the lower pool? And the second question is: Has solar energy generation changed the pattern with which you generate and pump?

MR. HAYES: So -- so the first one,

I -- I really don't have the exact answer for the

drainage area into -- into the Lower Reservoir or the

Project, so I'll have to get back to you on that as

far as exactly what it is. As far as the solar

question, yes, we have seen some -- some impact from

solar generation whereas they've taken -- when the sun

is shining, we've been pumping. So we have seen some

of that solar capacity come this way so that we

can -- so that we can store that solar energy in the

form of the water to higher or upper elevations and

then use it later in the day. So yes, we have seen

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some impact from the increased solar capacity on system.

MR. MCCASLIN: All right. Next question from John Faustini with Fish and Wildlife: What are the primary sources of power used for pumping and how do these vary seasonally?

MR. HAYES: The -- the primary sources for pumping, once again, we are seeing some -- some impact from solar generation, but our primary sources for generating are -- are nuclear and -- and fossil. So that's -- that's where we get most of our pumping power from is our nuclear and fossil co-owned plants and that's -- that's, you know, I'd say by being able to pump, that keeps them up at their best efficiency point generation, it doesn't have them throttling back and being less efficient, so that's -- our main sources are, are fossil and nuclear and assets.

MR. MCCASLIN: And then another piece to that question: How do you anticipate the power mix for pumping and the pattern of operation pumping versus generating to change in the coming years as more renewables, mainly solar, come online?

MR. HAYES: Okay. This is -- this is Rick's opinion for the most part, but I think it's going to be accurate. I think what you'll see is

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you'll see more pumping during the day to store that 1 2 solar capacity as more of that comes on and -- and more generation at night when the sun isn't shining. 3 So that's -- that's Rick's opinion as to what he 4 5 thinks is going to happen over the course of -- as more of these renewables or primarily solar come 6 7 online. MR. MCCASLIN: All right. That covers 8 9 all the questions in chat unless there are any others 10 for anyone to chime in. 11 MR. JONES: Yeah, and Tyler 12 I'll -- I'll jump in here really quick. Wei, we've 13 got the acre information in our Pre-Application Document and -- and we will double check on that. I 14 15 believe it's 600 acres that -- that the lower pool 16 covers in just -- in surface -- surface acres so but 17 we will double check that and make sure that we get back to you on that and -- and confirm what it is. 18 19 So --20 MR. HAYES: You are correct, Craig. 21 The Lower Reservoir is 600 acres. My understanding 22 was what's the, I guess the watershed in the area 23 for -- for the project, if I'm not mistaken. 24 MR. JONES: Yeah, I think Steve will

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have -- be able to address some of the -- the

watershed issues and the -- that the larger -- the larger context of the area when he gets into his presentation. So, okay, go ahead and wrap up Rick and then we'll -- we'll -
MR. HAYES: Okay. All right. I guess

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MR. HAYES: Okay. All right. I guess
I just -- the project, okay, take control. Got it,
okay.

So just more of the project overview.

Our -- our property is -- is about 5,000 acres within our FERC project boundary. 3700 of that acreage is available to the public for recreation. We have a visitor center, we have three boat launches, two on Antioch Lake which -- one on East and one on West and one out of Heath Lake. We have a beach for swimming on Antioch Lake West. It's right there with our campgrounds.

We have a very nice campground there with -- with a hookup, our electrical and water hookups there. Some tent sites. You can canoe, boating, or fishing is allowed. Idle speed only is our --is our rule. Picnic areas.

We do allow hunting in season, archery mainly on most of that, but we do have some firearm hunting for water fowl in season and fishing is allowed on both -- both of the Auxiliary Pools or

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Heath Lake and Antioch Lake East and West. Heath Lake is considered our trophy lake. We have that open the first ten days of every month and it's closed after that and that allows us to reduce the pressure on the fish, hopefully larger -- larger fish are caught.

We do have restroom facilities at the -- both at the visitor center. We have some other restroom facilities. We have a bathhouse. Each house at the beach. Lots of wildlife to see, lots of fish to catch.

Actually, have a picture of a young lady who was out fishing for catfish, ended up catching a 15-pound small -- or largemouth bass.

Quite -- quite a shock to her. A lot of recreation resources hiking, biking, camping, and it's managed by Georgia DNR and if you haven't been out here, come on out.

Georgia DNR does a fantastic job managing this facility. It is a great place to be.

Clean, well done, well kept, well managed. So that's all I have unless there are any questions.

MR. JONES: Great. Thanks, Rick.

And Tyler, I think I'll just have you just advance the slides until we get to hand them over to -- to Steve. That might be the most efficient

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thing to do. Okay. So yeah, you can go ahead and go to the next slide, too, now.

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So on the -- so as we talked about -- getting into it, we talked about the Pre-Application Document, the contents of that, the natural resource areas and our proposed studies. I just want to just -- just foreshadow some of that where -- where that PAD we're about to talk about, it includes, you know, information about our current proposed operations and that's what we filed in December. And then -- and then also, it has all the existing information that we can pull together or all the existing information really that was out there on the area and the natural resources and those that are potentially affected by our operations. And really, the intent of doing that is to identify any of the information needs really focused on identifying any gaps, not necessarily recreating existing information, but identifying any gaps in information and then that -- that leads into what we proposed for studies.

And as I mentioned earlier, there is a substantial amount of existing information and -- and that's large part thanks to the work that DNR -- our partnership with DNR that we've -- we've had going on down there at -- at the project. And then -- and then

for as far as -- and then if there are additional study requests in addition to what we propose, there is a process for doing that.

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And Tyler, if you can go to the next slide and I'll talk about those.

The intent of that is really to -- to fill in for any gaps that are in the -- any information in any gaps that -- that may -- that may be there from -- from your review of our agency and public review of our studies. When you do submit if you do submit study requests, there are seven criteria. I just want to throw these up here and I'm not going to talk about these in great detail. For those of you who -- agencies who have done this before, you're familiar with -- with the seven criteria and -- and really, the -- the criteria is really intended to get at connecting the -- the objectives of the study to management goals and -- and if it's a -- if it's a request from the public, then connecting the goals and objectives to the -- any public interest considerations, really to get at, again, any -- if there are any gaps in the information that still need to be filled.

24 And then a critical piece of this is a 25 nexus to the project operations so -- so that the

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study -- the relicensing studies are connected 1 2 logically to the -- to the project. And then -- and then providing the detailed methodology, cost 3 information, timeline that it would take to do the 4 5 study and it's really -- it is a pretty involved process so -- but these are the -- the criteria that 6 7 FERC has and I will -- and I'll just pause right there for questions. And if there aren't any, we'll move 8 9 onto Steve Layman and get into the -- really get into what the natural resource areas of the project. 10 11 MR. LAYMAN: Okay, great. Thanks, 12 Craig. Okay. 13 Yeah, good afternoon. I'm Steve 14 I'm an Aquatic Biologist and Project Manager Lavman. 15 for Kleinschmidt. We're helping Ogelthorpe Power with 16 the environmental studies and environmental 17 documentation for the license application. And in this segment, Kelly Kirven and I are going to cover at 18 19 a high level five of the key resource areas that are covered in the PAD, as well as the proposed study 20 plans for addressing information needs for each of 21 those areas that are proposed by Ogelthorpe Power. 22 23 So first, I'll cover water resources, 24 fish and aquatic resources, and wildlife, botanical, and wetland resources. And then Kelly will cover 25

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recreation resources and cultural resources. But before we get going, let me begin with some additional orientation and let me be sure that I've got control. There we go. And -- and I'll repeat some things, but it's such an unusual project configuration, I think it's going to be helpful to -- to repeat and show you locations of various water bodies and such.

But the Rocky Mountain Project is located in Floyd County about 10 miles northwest of Rome and it's in the Ridge and Valley physiographic province of Northwest Georgia. It's located in the Coosa River basin, specifically the headwaters of Heath Creek and Lavender Creek, which are tributaries to Armuchee Creek. Armuchee Creek flows into the Oostanaula River. The Oostanaula River flows south into Rome and it joins the Etowah River to form the Coosa River. So from Rome, the Coosa River continues west into Alabama at Lake Weiss which is just outside the view of this particular map.

This map shows the location of the project in the larger Alabama-Coosa-Tallapoosa River basin, or the ACT River Basin as it's known. The project's the red star and the ACT Basin is shown in grey here. The ACT Basin drains southwest across Alabama down to Mobile Basin in the Gulf of Mexico and

you can see the Coosa River begins in Northwest

Georgia, flows down through Central Alabama and joins
the Tallapoosa River near Montgomery, and that forms
the Alabama River which flows down toward Mobile. The
Coosa River comprises about 45 percent of the ACT
River Basin.

The Oostanaula River which is located in Northwest Georgia comprises about 21 percent of the Coosa River, and here I think we have an answer for Wei about the drainage area at the project. At Heath Creek, just downstream of the project dam at the USGS Gauge has a drainage area of 16.6 square miles, and that's about 0.8 percent of the watershed area of the Oostanaula River. Also downstream of the project in Alabama on the Coosa and Alabama Rivers, there are nine mainstem -- nine mainstem dams.

The Rocky Mountain Project encompasses 5,000 acres of land and water. The project boundary extends downstream about three-tenths of a mile on Heath Creek and you can see the red dot on the upper right portion at the downstream end of the project boundary and that's the USGS Stream Gauge which monitors discharge from the project. It's used to monitor discharge from the project.

The Lower Reservoir and the Auxiliary

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Pools are located on Heath Creek and its small tributaries on the north and west sides of Rock Mountain. And the Upper Reservoir is located on top of Rock Mountain on the drainage divide between Heath Creek and Rock Mountain Creek which drains east towards Lavender Creek.

Now, let's take a little closer look at the water resources at the project, and again, let's look at an image of the area, this time a Google Earth aerial photograph. And what becomes readily apparent from -- from this image is -- is how the land use around the project is dominated by forests. Some agricultural lands along the north and northwest side of the project. And then the recreation areas around the Auxiliary Pools and the project itself.

Auxiliary Pool 1 as -- as Rick referenced, is referred to as Antioch Lake. You can see that on the upper portion of this map. Antioch Lake East and Antioch Lake West. Georgia DNR manages them separately for fishery purposes, but they are connected beneath the road that comes in to the powerhouse.

Auxiliary Pool 2 which is in the bottom left is referred to as Heath Lake. And then Heath Creek in the upper right continues flowing

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east-northeast towards Little Armuchee Creek for about 5 miles and then you can see Rock Mountain Creek in the center. It originates along the base of Rock Mountain and it flows east towards Lavender Creek.

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Georgia's water quality standards have been established to protect the beneficial uses of waterways and this slide lists -- lists the beneficial uses of the project waters. We'll start with the Lower Reservoir and the Upper Reservoir. Their designated use is for fishing, but as Rick pointed out, they're not available for public use but for water quality purposes. They -- they're held to the fishing water quality standard.

Public fishing opportunities are provided by Antioch Lake and Heath Lake and they are classified for recreation including swimming, boating, and fishing. They're part of -- of the Rocky Mountain Recreation and Public Fishing Area or PFA, and that's managed by Georgia Department of Natural Resources.

Heath Creek downstream of the Main Dam is classified as fishing, but as you'll note,
Georgia's current water use attainability assessment has found that it's not supporting its designated use due to elevated fecal coliform densities in the -- in the water body and that's due to nonpoint sources.

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EPD conducted a total maximum daily load evaluation or a TMDL evaluation for Heath Creek and they identified the primary sources of fecal coliform being wildlife, agricultural livestock, and urban development such as leaking septic systems at residential properties.

None of these sources of fecal coliform are related to project operations, however.

And then finally, Rock Mountain Creek is classified as secondary trout waters. It's part of the Lavender Creek watershed and streams that are classified as secondary trout waters lack evidence of natural reproduction of trout, but they're capable of supporting trout year-round, stock trout. There is no outlet, surface outlet, from the Upper Reservoir to Rock Mountain Creek and so it has minimal effect, if any, probably none on -- on water temperature or DO concentration, dissolved oxygen concentration, in Rock Mountain Creek.

Ogelthorpe Power has collected a substantial amount of water quality data at the project since -- since it began operation in 1995. These data are summarized and discussed at length in the PAD and in general, they indicate overall good water quality conditions at the project. Article 31 of the license required that Ogelthorpe conduct water

operations began, so this monitoring was conducted at -- at these seven stations shown with the large blue dots in 1996 to 2002. And the table indicates the types of measurements that were done at each station and -- and in what years so the field measurements column includes in situ or measurements at the time of being in the field of water temperature, PH, dissolved oxygen, and conductivity. Water chemistry samples were also analyzed in the laboratory for 13 parameters ranging from turbidity and total suspended solids and hardness to biochemical oxygen demand, nutrients, and fecal coliform bacteria.

Over time, monitoring was discontinued

Over time, monitoring was discontinued at Station 8 on Rock Mountain Creek or RM08 because the water quality at the station appeared to be unaffected by project operation and that was in part at the time comparing it back to -- to pre-project water quality conditions. Over time, stations RM14 on Antioch Lake West and RM16 on the Lower Reservoir at the Main Dam were also discontinued because they were represented or had similar results with other stations. Water Chemistry sampling was conducted again from 2015 to 2020 at the smaller subset of stations, indicating the lower right-hand column.

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Other sources of existing water quality information summarized in the PAD include Georgia DNR monitoring data. Two -- two data sets in particular. They're vertical profile measurements from the Auxiliary Pools that have been collected in many years between 2003 and 2018 and these are vertical profile measurements of water temperature and dissolved oxygen in every foot of depth throughout the water column. The two plots on the right are just examples from the many that are shown in the PAD just to give you an idea of the quality of data that are available. So dissolved oxygen's plotted on the left side of those figures and temperature on the right side of those figures for about a six -- six-month period from April to October.

Another source of available water quality data for Heath Creek downstream of the project that were collected by Georgia EPD in 2001 and 2012 and those are available online on the GOMAS Water Quality Sampling Network that the Georgia EPD maintains. They assessed 14 water quality parameters in the laboratory, and those results are also summarized in the PAD. And those data are very consistent with Ogelthorpe's findings for -- for Heath Creek, which generally indicate overall good water

quality with the exception of fecal coliform.

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As Rick mentioned, Article 34 of the license requires the project to release a continuous minimum flow of 1.2 cubic feet per second to Heath Creek. Also part of that license article, Ogelthorpe Power conducted a field study of the minimum flow in 1996, so they examined the effects of four different release scenarios ranging from 0.6 cfs to 8.3 cfs and part of that study is summarized in the PAD and they measured physical habitat with those various flows, they sampled the fishery, they continuously monitored dissolved oxygen and water temperature, and they compared those data with Lavender Creek which was used as a reference site. The study found that the 1.2 cfs release maintained DO levels, that's dissolved oxygen, about 5.5 milligrams per liter, and they were similar to the levels measured in Lavender Creek. The minimum instantaneous requirements for dissolved oxygen in Heath Creek is 4 milligrams per liter, for comparison, and a daily average of 5. So the study concluded that 1.2 cfs provides sufficient flow to preserve water quality and maintain the resident fishery in -- in Heath Creek.

quality data set with monitoring they've done and

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Ogelthorpe Power has a robust water

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monitoring by DNR, but they do propose some additional sampling in 2022 to update these data. So the -- this is outlined in the PAD. These are the objectives listed there which are to characterize the existing water quality in the Rocky Mountain study area and then to use these data to analyze the effects of project operation and maintenance and project-related recreation on water quality in the draft license application.

The study area would include the Lower Reservoir, Auxiliary Pool 1, Auxiliary Pool 2, and Heath Creek downstream of the Main Dam within the project boundary. So the key elements of the study that is being proposed are to compile and analyze the existing water quality data and then to supplement that with one year of monthly water quality sampling at four historic stations within the project boundary.

This slide shows the proposed monthly sampling stations and parameters. The four stations would -- would include the Lower Reservoir, Antioch Lake East, Heath Lake, and Heath Creek downstream of the Main Dam. Sampling's not proposed for the Upper Reservoir because it exchanges water daily with the Lower Reservoir and they fluctuate substantially 51 feet for the Upper Reservoir, 20 feet in the Lower

Reservoir, so they remain well mixed so that Station 16, RM16 on the Lower Reservoir is reasonably representative of the Upper Reservoir as well. Rock Mountain Creek is not proposed for sampling either, because there's no outlet from the Upper Reservoir to that creek and the previous sampling indicated that the water quality is unaffected by project operation.

The proposed water quality sampling parameters for each station are shown in the bottom right. They would include the same field measurements that were conducted in the 1996 to 2002 monitoring events and then six Water Chemistry parameters listed here including biochemical oxygen demand and the various organic and inorganic forms of nitrogen and phosphorous as nutrients.

The schedule for the water quality assessment would be to finalize the study plan once we've received your comments by -- by the middle of May. To begin data compilation and monthly sampling by the May-June timeframe and complete the one-year of monthly sampling by April or May of 2023. Prepare a study report by December 2023 and then that would be filed with the DLA or the Draft License Application for stakeholder review approximately February of 2024.

So at this point, I'll pause and -- and

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see if anybody has any questions or comments about water resources or the proposed water quality assessment. You'll also have opportunities to comment, you know, after we're finished this overall presentation. And I can't see the chat so if -- let me know if any questions come up.

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MR. MCCASLIN: Nothing in chat right now, Steve.

MR. LAYMAN: All right. Well, let me move on and you'll have plenty of opportunity if -- if something comes up. But let me move on to fish and aquatic resources.

And Antioch and Heath Lake, which hopefully you're getting familiar now with those as the Auxiliary Pools, they're managed by the Georgia Department of Natural Resources as part of the Rocky Mountain PFA. Together, those lakes total about 600 acres and Georgia DNR intensively manage these -- these lakes to provide quality public fishing opportunities and they conduct annual electrofishing and gill netting surveys of the lakes to monitor the populations. The PAD summarizes what's a substantial amount of existing information and data for these lakes that comes from -- from their annual reports that date back to the early 2000s. As Rick mentioned,

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these lakes support popular warm water fisheries for largemouth bass, sunfishes, black crappie, channel catfish, and even walleye has become a popular fishery, I think mainly in Antioch Lake.

The figure on the left is from the annual report for 2018 and it shows the long-term trend in electrofishing catch rates of the largemouth bass in the -- in the two sub-impoundments of Antioch Lake and also in Heath Lake. And Georgia DNR has found a -- a positive relationship between annual fertilization rates and the game fish biomass and fishing quality so it's a crucial component of the management in the public fishing area. Also, Antioch Lake is open to fishing year-round while Heath Lake is limited to the first ten days of every month to provide a -- a trophy fishing experience for catching large largemouth bass.

Heath Creek downstream of the Main Dam is a low-gradient, warm water stream. It flows about five miles to Little Armuchee Creek. Based on fishery sampling conducted by Ogelthorpe Power and Georgia DNR, Heath Creek supports about 35 species of fish in eight families including a variety of sunfishes, minnows, suckers, and darters. Georgia DNR's Stream Team sampled Heath Creek in May 2001 and August 2002

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to evaluate the fish community health and they used Georgia EPD's fish community biomonitoring protocols or standard operating procedures and that -- that includes conducting backpack electrofishing to survey the fish community. They did their sampling about 2.5 miles downstream of the Main Dam at the big -- no, not Big Texas Valley, but the Texas Valley Road crossing. It's one of the few road crossings over that reach.

They applied the Index of Biotic

Integrity, or IBI, which is a -- a multi-metric
approach for -- for comparing fish community
attributes with the least disturbed reference
conditions for the ecoregion. So as shown in this
figure on the right, they found the -- that the IBI
yielded scores indicating good overall biotic
integrity based on the fish community in both sampling
events. Based on the sampling that's been conducted
today, we're not aware of any federally or state
listed fish species that have been known to occur in
Heath Creek or -- Heath Creek or been collected
recently. And there are no diadromous fish species
that are known to occur in Heath Creek.

Diadromous fish species are those species that migrate between fresh water and salt water to spawn or to complete their life cycle. There

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are striped bass that have been stopped into Weiss
Lake downstream and they do reproduce in the
Oostanaula River, at least there's some evidence of
their spawning. But they're not known to get up into
the tributary system of Armuchee Creek or Heath Creek
at least, not -- not that small of a -- a system.

Seventeen federally and/or state listed

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aquatic species have the potential to occur in the project vicinity. They are listed here.

They're -- they're five fish, I think about 11 freshwater mussels and snails, and one aquatic insect that's under review for federal listing. None of these are presently known to occur within the project boundary, but there is a lack of available sampling records for freshwater mussels and snails in Heath Creek.

Critical habitats have been designated in the Oostanaula River for ten federally listed threatened and endangered species of mussels and snails and as identified by the U.S. Fish and Wildlife Service in its comments on the PAD, several rare species of mussels are known from historic records in Armuchee Creek watershed, so they do have the potential to occur in Heath Creek. Those are indicated by an asterisk on the -- in the bottom

right. We have updated this table from the PAD to reflect the U.S. Fish and Wildlife Service comments and we'll carry forward this list and continue to update it as needed in the proposed study plan, through the study reporting, and the license application.

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So Ogelthorpe Power proposes to conduct an Aquatic Resources Study to characterize the existing communities of fish and mussels in Heath Creek. And -- and this study would update the fish community sampling from 2002 and would fill the gap in recent survey efforts for freshwater mussels in Heath Creek. So the study objectives would be to characterize existing communities of fish and mussels in Heath Creek and then in the license application, analyze the effects of continued project operation on aquatic habitat downstream. The study area is circled in blue. That's the approximately 5-mile reach of Heath Creek before it enters Little Armuchee Creek.

And the key study elements would be the fish community survey. That would involve two representative locations on Heath Creek. We would propose sampling at the same site that was used by the -- the DNR Stream Team back in 2002 at Texas Valley Road, and also a second station within the

project boundary, around the vicinity of the USGS

Gauge. The -- the study methods would follow EPD's

fish community biomonitoring standard

operating -- operating procedures and we would apply

the Index of Biotic Integrity to evaluate fish

community health. Sampling would be conducted by

backpack electrofishing primarily.

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Mussel survey would also be conducted in that reach of Heath Creek using a search design that's appropriate for representing the available habitats, assessing presence/absence of native species, and characterizing relative abundance and site -- size characteristics of many live specimens encountered. Ogelthorpe Power would contract with a -- a mussel expert to further develop the study design and consultation with DNR's wildlife conservation section at Fish and Wildlife Service, but it wouldn't be quite as restrictive in its locations necessarily as the fish community survey. It might involve a larger number of -- of survey points down the creek following a, you know, an occupancy-based sort of sampling approach, which -- which has been designed by DNR for other -- other types of projects. So we would consult on that.

Here is the proposed schedule for the

1 Aquatic Resources Study. Similar to water resources, 2 the study plan would be finalized after we receive comments. The fish community survey and the mussel 3 survey would be conducted this year between June and 4 5 September. Study report prepared by January of 2023, and that would be filed with the Draft License 6 7 Application for stakeholder review by early 2024. So I'll pause here again and open it up 8 9 for any questions or comments about aquatic resources 10 and the proposed study. Okay. Hearing none --11 MR. JONES: There is a -- yep, there's 12 a question in chat, Steve. 13 MR. LAYMAN: Okay. 14 MR. JONES: And it's -- this is from 15 Jackson Sibley: Where will stakeholders be able to 16 access the study timelines once they are finalized? 17 So that's a -- that's a good question, Jackson. Steve, if you don't mind maybe I'll take that. 18 19 MR. LAYMAN: Yeah. 20 MR. JONES: So that's -- gosh, 21 that's -- that's a good question. So what we're going 22 to do is once we -- there will be that -- that 60-day 23 comment period. I'm going to talk a little bit more 24 about next steps when we get into -- or the end of the

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presentation. But once we -- once we are able to

Page 51 1 finalize those study plans, we will definitely make those work with the agencies on -- on finalizing and 2 getting feedback on those methodologies and 3 then -- and then once we -- once we get that dialed 4 5 in, then we'll have a good sense of -- of when -- exactly when they start and the timeframes. 6 7 I think these are probably pretty good, but we'll -- we'll provide more information as 8 9 we -- as we get closer to that point of beginning 10 on -- on that. So we will -- that's part of how we're 11 going to informally consult. We'll definitely reach 12 out and touch bases on -- on where we stand with 13 timing. 14 MR. LAYMAN: Okay. Thanks, Craig. Anv 15 others? 16 Okay. I'll move onto Wildlife, 17 Botanical, and Wetland Resources. As characterized in the PAD, the terrestrial vegetation and wildlife of 18 19 the project are representative of the Ridge and Valley province of Northwest Georgia. Now, the predominant 20 21 forest types include pine-oak forests in the areas 22 surrounding Auxiliary Pools, chestnut oak forests with 2.3 pines on the slopes around Rock Mountain, and 24 oak-hickory forests on the southwest side of Rock Mountain. Notable occurrences of wildlife species

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within the project boundary include one active bald eagle nesting territory and the green salamander, a Georgia rare species, is known to occur among the boulders and cliffs on the slopes of Rock Mountain.

Georgia DNR conducted a vegetative survey of the wooded uplands of the project in Summer 2012 as part of the Terrestrial Management Plan for the project. This figure on the left shows the numerous vegetative survey points that they used throughout the project area and the figure on the right shows their mapping of the three dominant upland vegetative community types. The green corresponds to the pine-oak forest, the orange circle corresponds to the chestnut oak forest that encircles Rock Mountain on the slopes, and in the red corresponds to the oak-hickory forest on the southwest side of -- of Rock Mountain. So there's a substantial amount of existing information about the dominant vegetative community types.

All right. Let's advance. There we go. Wetlands within the project boundary include freshwater forested/shrub wetlands totaling at least 6.75 acres. In the PAD, we -- we reference national wetland inventory information which tends to be dated so there -- there may in fact be more wetland acreage

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than that which would be part of our proposed study approach. But they are small, shallow wetlands dominated by trees, shrubs, and emergent vegetation.

There's also about 29 acres of stream habitat total within the project boundary. They're characterized by narrow floodplains with deposits of sand and clay. And then there are littoral habitats which are shallow water habitats that are shallow enough where light penetrates the bottom and there's a potential for aquatic vegetation to grow. It's quite prevalent in the Auxiliary Pools. There's 33 percent that's less than 5 feet deep at Heath Lake, plus 29 percent of the lake is -- has flooded timber, so it has important wildlife habitat. And then Antioch Lake about up to 22 percent is less than 5 feet deep to indicate in general the -- the shallow areas that it has, but it is only 2 percent with flooded timber.

Nine federally listed or candidate species potentially occur within the project vicinity as listed here, including six plants, one insect, the Monarch -- Monarch butterfly which is a candidate species being considered for possible listing, and then two species of bats. None of these species are presently known to occur at the project, although the Monarch butterfly is widespread in the Eastern U.S. in

the spring and summer and likely occurs in the project The PAD also lists numerous other state-listed species, including 21 plants, the aforementioned green salamander, two species of map turtle, and the bald eagle which I also mentioned has an active nesting territory within the project boundary.

Ogelthorpe Power proposes a terrestrial and wetland resources survey with the objectives of describing these existing terrestrial wildlife and botanical resources, as well as floodplain, wetlands, riparian, and littoral habitats. Identifying potentially suitable habitats for rare, threatened, and endangered species, or so-called RTE species, of plants and wildlife. And then identifying invasive species within the project boundary. So the study area would include the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

The key study elements, then, would be conducting a field reconnaissance survey in spring or early summer, at least the primary portions of it, and that would be conducted by boat along shorelines of the project waters, as well as by pedestrian surveys around project recreation areas and probably -- probably throughout much of the project

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area. The purpose of those surveys would be to characterize available habitats and identify representative plant and animal species. Also to identify any unique or sensitive habitats that may harbor rare plant or animal species and to identify large occurrences of invasive species.

Another key element would be to prepare a map of the project boundary delineating the principal vegetative community types including wetlands and getting a better update on how many wetlands and their locations and types in the project boundary. And that would be based on beginning with DNR's vegetation surveys, other sources, and ground-truthing of aerial photography. And the proposed schedule for the terrestrial and wetland resources survey would be conducting the field surveys primarily in April through September of 2022. April 2023 if needed if we couldn't get started soon enough to catch some of those early -- earlier blooming plants. Preparing a study report by June 2023, and then filing that report with the DLA in early 2024.

So I'll -- I'll open it up here, again, one more time for any questions or comments about the terrestrial wetland resources study plan.

MR. JONES: And looks like

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Page 56 1 you're -- you're good to go. There' nothing in the chat right now. 3 MR. LAYMAN: All right. Thanks, and I'll hand it over now to Kelly Kirven who -- she will 4 5 cover the next two resource areas. 6 Take it away, Kelly. 7 MS. KIRVEN: Thanks, Steve. Okay. Make sure I've got control here, all right. 8 9 Hi guys, good afternoon. As Steve 10 mentioned, I'm Kelly Kirven with Kleinschmidt. 11 going to be reviewing the recreation resources 12 available at the project and then the cultural 13 resources at the project. So we will start. 14 So there are, as mentioned previously, there are approximately 5,000 acres of land and water 15 16 that are within the Rocky Mountain project boundary of 17 which 3700 of those acres are available for the public

Lake.

There is no recreation activities

available at the Upper and Lower Reservoirs and the

one main recreation area at Auxiliary Pool 2 or Heath

for recreational activities. Mostly within the Rocky

Mountain PFA includes two main recreation areas at the

Auxiliary Pool 1 as we mentioned, Antioch Lake, and

Mountain Public Fishing Area or PFA. The Rocky

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associated shorelines, mostly due to public safety and the fluctuation of the reservoirs due to the pump storage operations. And also, as -- as we've mentioned, Georgia DNR manages and operates the project recreation facilities through an existing MOU. All right.

Okay. So here we have a couple of figures just to kind of orient with the -- the way that where the project recreation facilities and amenities are located. So this first image is Auxiliary Pool 2 or Heath Lake, and you can see where, you know, the boat ramp, the picnic area, hiking, biking trails, those sorts of things are located. And the next image, we have Auxiliary Pool 1 West, or Antioch Lake West, and you can see where the visitors center is located, restrooms, hiking, boat ramp, picnic areas, those sorts of things.

Then two more figures. Here we've got a view of Auxiliary Pool 1 West or Antioch Lake West, and you can see we've got the beach and the beach house, campers' station, and you can see where some of the camping sites are -- are located in that area. And then we also have an image of -- up in the top of the image you can see, and I'll move my pointer if you can see that, Auxiliary Pool 1 East or Antioch Lake

East, and then how -- where that's located in reference to the Lower Reservoir and the Powerhouse.

Okay. So next I'm just going to review some of the amenities that are associated with each recreation area. So at Antioch Lake East, we have got the Day Use Facility parking area, picnic area, group There's a one-lane concrete boat ramp, a floating dock, and restrooms.

Antioch Lake West, and this is the most highly developed and most used recreation area at the project, and that's where we've got the swimming beach and that has a sand beach, bathhouse, and restrooms. A picnic area, a boating area with parking for vehicles and vehicles with trailers, a concrete boat ramp, courtesy dock, picnic area, again restrooms. And a pretty large camping facility, group camping and family camping.

Okay. And then moving on to Heath There's also parking, a single-lane concrete Lake. boat launch, and I am going to note, so the image here that we have is -- is actually an old image of the -- the boat ramp there, the courtesy dock. So that has been re-done since this picture was taken, so there -- if you -- if you were to go out there today, it would look just a little bit different. But once

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again, a trailhead with parking and -- and trails.

And then we have a figure here that kind of shows where some of the hiking and biking trails are located at the project.

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I'm also going to mention that hunting is allowed at the project during state-designated hunting seasons. The use of firearms is allowed within the project boundary during water fowl hunting seasons in designated areas. Bow hunting is also allowed in designated archery seasons for deer, small game, turkey, for bears and such.

So we're going to move on here. As we mentioned, you know, Georgia DNR manages and operates the recreation facilities at the project. They also collect recreation use data through a variety of methods. They also have attendance records and so here we've got some of the attendance records that Georgia DNR have provided to us from 2015 through 2021 and so this is where, and we'll talk about it a little bit more, but, you know, we'll -- we will lean pretty heavily on the use information that Georgia DNR collects at the recreation sites as part of the recreation assessment. And you can see, it sees a pretty -- pretty significant amount of use at -- at the project.

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Okay. So proposed study plan, the main study objectives are to characterize the existing facilities and use through existing information, as I mentioned, that Georgia DNR currently collects. Also through recreation user groups and some limited field activities. The study area will include the Rocky Mountain Public Fishing Area.

And key elements will include a review and analysis of existing information. We do have the 2015 Form 80 information, although the Form 80 has been discontinued by FERC. We do have the -- the data from 2015 and will likely incorporate that, along with a more up-to-date recent data collected by Georgia DNR. We also plan to have small user group interview to target various -- various groups, hunters and fishermen, to get feedback from -- from them. And we'll also make sure that, you know, recreation at the project will analyze its consistency with the Rome-Floyd County Comprehensive Plan.

Here we have just kind of a general schedule for the study. Finalize the -- the study plan in the May to June timeframe. Begin data compilation in June of this year, conduct those user group interviews sometime in the July to November timeframe. Analyze data into early 2023 and then

Page 61 1 prepare a study report during the summer of 2023 that will be filed with the DLA around the February 2024 2 timeframe. 3 So if there are any questions with 4 5 recreation, I see there was a comment there on the archery range at Heath Lake also. Yes, absolutely. I 6 7 did forget to mention that one. Thank you. MR. HAKALA: Kelly, this is Jim Hakala 8 9 with the Georgia Department of Natural Resources. 10 MS. KIRVEN: Yes, sir. 11 MR. HAKALA: I wanted to -- I wanted to 12 ask you a few questions and get some clarification 13 on -- on some of the proposed study plans here. 14 MS. KIRVEN: Sure. 15 MR. HAKALA: When it's -- when you 16 indicate the study will characterize the existing 17 facilities, will that also -- what -- what exactly will that entail? 18 19 So that will MS. KIRVEN: Sure. include an inventory, so we'll identify all of the 20 21 amenities that are located and then also potentially I 22 kind of characterize the condition, so if anything 23 needs to be updated or improved or anything such as 24 that. 25 MR. HAKALA: Okay. Yeah, that

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1	1	was that was my question if was there going to be a
2	2	condition assessment and
3	3	MS. KIRVEN: Yes, sir.
4	4	MR. HAKALA: would it also include
5	5	aspects of the infrastructure associated with those
6	6	facilities, such as the sewer system associated with
7	7	each one?
8	8	MS. KIRVEN: Sure. And so and I
9	9	imagine that's probably geared towards the the
10	10	camping and and the restroom facilities. That's
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	11	something that willprobably does need to be
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	12	included and I will mention that, you know, we do plan
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	13	to work pretty closely with you guys, with DNR, to
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1 -	14	make sure that we cover all aspects since, you know,
15	1.5	DND to managing the facilities was sure as along
16	15	DNR's managing the facilities, you guys are so close
10	16	to everything. We will make sure and cover all
17	10	to everything. We will make sure and cover all
Ι,	17	of all of those items and if there's anything that
18	1,	or arr or enobe reems and ir energy anything that
10	18	DNR knows of that needs, you know, extra attention, we
19		Distributed of characters, you show, chefu decemerati, we
	19	can make sure and include that.
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	20	MR. HAKALA: Okay. Great, great.
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	21	MR. HAYES: Hey, Jim it's Jim, it's
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	22	Rick Hayes, here.
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	23	MR. HAKALA: Yeah, Rick.
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	24	MR. HAYES: Just to let you know that
25		
	25	we do have some capital projects we're working on,

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particularly for the dump station. Also have reached out and Dennis Shiley has provided us some replacement of -- of the outhouse pit toilets, so we're working -- and so we're looking at what we need to do as far as some, you know, capital replacements out there at that -- at that facility right now. So that's --.

MR. HAKALA: Okay. Well, this -- it sounds like this will -- this will fall in there and help that along. Thanks for -- thanks for the update on that.

The other question I have was, you know, characterizing the recreational use at the facility and it looked like it was going to be a review of existing information, but then also contact with recreational user groups and specifically in the -- in the key study elements, you were talking about reaching out to fishing, hunting, and boating clubs.

MS. KIRVEN: Yes.

MR. HAKALA: I would say that there's obviously a lot of people that fish, some that hunt, and a lot of people that boat out there, but there's, in terms of clubs, pretty -- pretty limited. I mean, there's --

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Page 64 1 MS. KIRVEN: Okay. 2 MR. HAKALA: -- some fishing groups that have -- have tournaments out there. If -- if 3 those type of things are limited, are -- are you going 4 5 to try to basically survey everybody that's coming in there to get a representative sample of the -- of the 6 folks that are -- that are visiting out there? 7 8 MS. KIRVEN: Sure. 9 MR. HAKALA: Go ahead. 10 MS. KIRVEN: Yeah, yeah, no, I was just 11 going to say I think at this time, we haven't proposed 12 to survey the -- the general public, but that is a 13 good point if there's not these user groups that we can easily get to or that just don't, you know, don't 14 15 use the area. You know, it is something to consider 16 to -- to kind of gather the information that we would 17 need. So I would say, you know, at this point, it's -- it's not what we've proposed, but it is 18 19 something to consider for sure. 20 MR. HAKALA: Okay. I think -- I think it would be good to, you know, to -- to get a, you 21 22 know, comprehensive recreational use and -- and, you 23 know, satisfaction survey. 24 MS. KIRVEN: Yep. 25 MR. HAKALA: Maybe one that follows

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Page 65 1 suit to the -- the data we collected in 2006 and 2007. 2 MS. KIRVEN: Okay. 3 MR. HAKALA: Which -- which I believe -- believe you had. I think it's -- I think 4 5 it's -- it's important to find out, I mean, 2006 or 2007's quite a -- quite a long time ago and -- and, 6 7 you know, there's a possibility that the user base has shifted, you know, what are they coming to the 8 9 facility for and -- and, you know, how can we best 10 meet, you know, changing demands on -- on who's 11 visiting the facility. 12 MS. KIRVEN: Right. 13 MR. HAKALA: Make it the best experience possible, so I, you know, that's something 14 that -- that we would definitely be interested in. 15 16 MS. KIRVEN: Absolutely. 17 MR. SIBLEY: Yeah, hey, Kelly, this is 18 Jackson Sibley with Georgia DNR here. Yeah, to that 19 note, we do have all the -- the data sheets and all that stuff from the 2006 survey as well. If there's 20 21 going to be a chance for all of us, I guess like you 22 mentioned, to get together and sort of iron out the 23 details of -- of what the survey might look like, 24 yeah, just -- just reach out to us. We definitely have some things that we'd like to discuss and --25

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MS. KIRVEN: Absolutely.

MR. SIBLEY: -- yeah, we might be able to help each other out in that regard.

MS. KIRVEN: Perfect, yeah, that sounds great. And that's -- I think that's really kind of the idea, you know, we've proposed some things, but we definitely want to collaborate with DNR to make sure that we're capturing information that is useful to Oglethorpe, but also DNR as the managers of the facility, so, absolutely.

MR. JONES: And I'll just -- this is
Craig Jones with Oglethorpe. I'll just jump in there
too and -- and I agree, yeah. Part of this, you know,
if there are things that we can just iron out in a
discussion of the -- the methodologies, then -- then
great. If it's a -- if it's a completely new study,
then, you know, that's something that -- that, you
know, we certainly want to consider and getting
together and chatting through what that looks like, I
think would be very productive so we're -- we're very
open to that and, you know, this gets at -- and the
point that I'll make later, but as we -- as we
finalize our methodologies, we do want to work
with -- especially with the agencies and get your
feedback to make sure that we are hitting the

Page 67 1 methodology correctly and -- and tweaking that as we -- as we need to, so that's something that -- that 2 we will -- that is forthcoming. 3 MR. SIBLEY: Okay. Yeah, well feel 4 5 free to reach out to us directly. We'll -- we'll definitely be available for that conversation. 6 7 MR. JONES: Great, thank you. MS. KIRVEN: Yes, thank you. 8 9 MR. SIBLEY: Thank you. 10 MR. HAKALA: Thanks, Craig. Thanks, 11 Kelly. 12 MS. KIRVEN: Absolutely. 13 All right. So I'm going to move on if 14 there aren't any other comments on recreation. Okay. 15 All right. So we're going to move into 16 the cultural resources at the project. So between 17 1972 and 1996, there was a lot of cultural resource studies that were completed at the project and in 18 1997, Garrow and Associates summarized these studies 19 into one document, which is titled Cultural Resource 20 21 Studies at the Rocky Mountain Project, Floyd County, 22 Georgia, A Technical Synthesis, and that's 1972 to 2.3 1997. 24 The synthesis lists numerous prehistoric archaeological resources, historic 25

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archaeological resources, and historic architectural resources and -- that have been documented in the project area since 1972. Also in 1997, Garrow and Associates revised the existing Rocky Mountain Project Cultural Resource Management Plan and the plan lists six archaeological properties and one removed standing structure and -- and -- for -- that was removed for continued preservation. So you'll see we've got some of -- we've got all of those listed here on the screen, along with their National Register of Historic Places eligibility.

The -- as I mentioned and I'm going to go to the next slide and then I might pop back to this one, but -- and it might take a minute to load so if -- if your screen is blank, it's coming. But the -- so the -- the resource that I mentioned, the Cordle Store, in 1997, and this is an image of the -- the store here, it was relocated from its historic location at Big Texas Valley Road and Old Fouche Gap Road, I might have mispronounced that, Fouche Gap, to a site near the project's visitor center. So if you go out to the visitor center at the recreation area there, you'll see the store. It was relocated just to -- so that it could be more monitored constantly and protected from any vandalism,

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and then there's a nice little write-up you can see, pointing, you guys can't see that. So we'll see this little sign here, and so this is just an up-close picture of some of the information that's included on it.

So I'm just going to pop back one here. So just kind of revisiting these properties that were listed in 1997. In 2020, TRC Environmental Corporation conducted an archaeological monitoring at the project with a goal of locating and visually assessing the current condition of the sites that were previously recommended for preservation and monitoring.

During that monitoring, all of the sites were located and shown to be well-maintained and protected. So the Cordle Store, as we mentioned here, was actually in -- in the 2020 review. Since the store has been relocated, the original site has lost its integrity and so therefore, it's recommended to not be -- that actual site to not be monitored anymore. The Cordle Store will, of course, still be monitored as it's located near the visitor's center.

And then also the -- this -- the Clarence Montgomery Farm, the -- TRC is recommending an archaeological survey to define the boundaries of

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this site and to determine whether or not it should be eligible for the NRHP. So until that happens, Ogelthorpe will continue to -- to monitor the area. So that's where we are for cultural, and I'm just going to skip on down to the proposed study plan.

So the objectives are to identify and summarize the known historic properties, that's going to be through a literature search and a site file There will also be an element for conducting review. field survey to identify any newly qualified historic structures and those are also structures that may not qualify at this time, but during the course of a new license, so within the next 40 to 50 years and such things as the powerhouse and -- and other project features. And they'll also determine their NRHP eligibility.

Then another component of the study will be that archaeological survey that we mentioned for the site to identify the site boundaries and determine whether or not it's eligible. And then also evaluate the potential for any effects of continued project operations. The study area will include the Area of Potential Effect, which will be determined in consultation with SHPO. And then key study elements include consultation with the Georgia HPD and FERC

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throughout a very close consultation throughout the study. And then also ultimately, the existing Cultural Resources Management Plan that I mentioned from 1997 will be revised to be a new Historic Properties Management Plan or HPMP.

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"Fushay."

And so a general schedule, similar to the others, you know, first step will be to identify the APE and that will be in the May to June timeframe. And then finalize a study plan in -- in June or thereabouts. Conduct the -- the literature review will happen this summer of 2022 and then the field survey and the archaeological survey will happen in the fall of 2022. And then move on to preparing the study report through the end of this year into early 2023 and then the study report will be filed with the draft license application for stakeholder review in the February 2024 timeframe.

So any questions on cultural?

MR. HAYES: Hey Kelly, it's pronounced

MS. KIRVEN: Fouche, okay. Thanks
Rick, I knew I was butchering it and I felt like there
were so many different ways it could have been
pronounced so I just went with one and I knew it was
wrong, so thanks.

Page 72 1 MR. HAYES: Well, you gave it a good 2 try. Fouche. 3 MS. KIRVEN: Thanks. MR. JONES: All right. Thanks, Kelly. 4 5 I don't see any -- I don't see any questions in the 6 chat. 7 MS. KIRVEN: Thanks. 8 MR. JONES: So Tyler, if you can put 9 the -- put the controls over to me, oh, well, you can 10 just put the slide, too. So thanks. The next steps, 11 so we'll just go from here. 12 The next steps in the relicensing 13 process. We talked a little bit about that during the exchange that we had on the -- the recreation studies, 14 but as I mentioned earlier, there is a 60-day comment 15 16 period after this meeting and that takes us out to May 17 15. Once we have those comments on the -- on the proposed studies and if there are any -- you recommend 18 19 any additional recommended studies then -- then we'll consider them and then we're going to respond to those 20 21 individual comment letters to make -- so basically, we 22 can close the loop on -- on that exchange. 23 And -- but as we discussed, as I 24 mentioned earlier and -- and as, you know, Jackson our -- and Jim our -- our little discussion just a

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little bit ago, it may make sense to have a follow-up meeting after this meeting. So if that's something that -- that you would like to do that would be helpful, then -- then definitely please reach out to us and we can, you know, and we'll do the same thing to make sure that -- that we can have the discussions. And like I said earlier that -- that there are formal stages of consultation and again, they're summarized here and it's a little limited if we just stick to that and we don't intend to just stick to that, so we intend to be very -- very transparent in how we go through this process and -- and work with -- work with you all.

In terms of the future, then, going -- going out into the -- into the study phase, we'll -- we'll reach out, again, to -- like I mentioned, to get input on methodologies and make sure that everything is -- that we get, you know, that we have a -- a good exchange of information on that. And then once we -- once we do the studies and are able to develop draft study reports, then we're going to want to get agency input on that as well. So we'll be reaching out around those times and -- and I'm sure that there will be times in between that will have opportunities for discussion to talk about

those -- those draft study reports and they will include the findings. And then based on those informal discussions, we'll finalize the study reports and that will be -- form the foundation for our draft license application that we file.

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So that's -- that is -- that really is essentially the -- the relicensing process and a very -- very high-level look at what the -- the future looks like. And so I think that the -- I think the next thing that we have on the agenda is public comment. But before we get to that, I -- I do just want to pause again and -- and see if there are any -- any additional questions that we can answer at this time. Or comments before, you know, from before making formal public comment.

Okay. Great. So what we'll do, then, is -- is we will provide an opportunity for -- for really, and this is not just, I mean, if agencies would like to make comment here too, that's great. You're certainly welcome to. If -- if we have anybody from the public who would like to make comment, just ask that you just go ahead and -- and take yourself off mute and state your name and -- and affiliation if it's something other than -- than just member of the public so that we can have that for the transcript and

we will go ahead and take public comment now if there
is anybody that would like to.

MR. MURRAY: Hi, Craig. I would like to make a public comment.

MR. JONES: Great.

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MR. MURRAY: My name is -- yeah, my name is Ben Murray. I'm with the Rome-Floyd Chamber of Commerce. I would like to just add that, you know, obviously Ogelthorpe Power and Rocky Mountain Pump Storage Hydro facility are very valuable corporate citizens of Floyd County and the greater Rome area. They really are a part of the critical infrastructure of Georgia's electric grid, they are a reliable piece of our county tax base, and in 2021, Ogelthorpe Power Corporation paid over three million in property taxes to Floyd County so -- and they also offer our citizens and visitors with recreational opportunities, good paying jobs, and it's all right here in our community, so we fully support this relicensing project and we fully support the hydro -- the pump storage hydro facility and anything we can do, we're glad to help.

MR. JONES: Thank you, Ben.

I'll pause for just a few minutes to see -- or maybe a few seconds. A few minutes might be too long. I'll pause for a few seconds to -- to see

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if there is anybody else who would like to -- to make public comment. Again, while -- while we're waiting for if there's anybody else that is going to take themselves off mute while we're waiting. I do just want to reiterate that there -- that there is an opportunity for -- for written comment and -- and the information was dropped in the chat earlier and if you have -- there it is again, thank you, Eric. And if you have any questions about how that mechanically is done, as well, please just reach out to -- to me and we will make sure that you have that information.

All right. So I will -- I will go ahead and -- and move to -- to close out this meeting and I just want to, one, thank you for -- for your interest in this -- in this project. As, you know, it's -- this is -- this is a great project and -- and it's -- it's something that is -- that it really provides some -- some good -- it's a good resource for the community. It's a great opportunity to -- to keep this -- this rolling and we look forward to our future process and good working relationships with everyone. So we very much look forward to the process and continuing this project.

So with that, I will close this meeting and thank you and we will be in touch.

Page 77 1 Yes? You're welcome and -- and we're 2 happy to make a -- make a transcript available once we 3 have that to -- to anybody who -- who requests that so let me know if -- if that's something that you would 4 5 like to have. Shoot me an e-mail afterwards. That's 6 great. 7 Okay. Great. Thank you, Deidra. All right, I think that's it so we will conclude and thank 8 you, again. 9 10 (Whereupon, the meeting concluded at 11 3:51 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25

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whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or other than action.

DEIDRA MUSICK NASH

Notary Public in and for the

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2.4

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From: Jones, Craig
To: McCaslin, Tyler
Subject: FW: Relicensing

Date: Friday, March 18, 2022 2:41:57 PM

Attachments: <u>image003.png</u>

Tyler, please include this email in our consultation record. Best, cj

From: Missy Kendrick [mailto:missykendrick@developromefloyd.com]

Sent: Friday, March 18, 2022 12:37 PM **To:** Jones, Craig <craig.jones@opc.com>

Cc: McClearen, Diane <diane.mcclearen@opc.com>

Subject: Relicensing

External E-Mail

Good morning, Mr. Jones!

I wanted to reach out to you to share our support for the relicensing of the Rocky Mountain Hydroelectric Plant in Rome, GA. Oglethorpe Power is an important partner to our economic development efforts, both here in Rome and around the state. They are wonderful corporate citizens, as well, and play a valuable role in tourism through the recreational opportunities. The plant also provides great jobs and contributes to our industrial tax base. On behalf of the Rome Floyd County Development Authority, I hope that the relicensing will be positively considered. Please let me know if I can do anything else to help.

Sincerely,

Missy Kendrick, EDFP, IOM
President/CEO
Rome Floyd County Development Authority
800 Broad Street, Suite 102
Rome, GA 30161

Office: 706-413-4213 x 1 Cell: 770-584-5234

missykendrick@developromefloyd.com

www.developromefloyd.com





From: <u>Jones, Craig</u>

To: <u>Sibley, Jackson</u>; <u>Hakala, Jim</u>

 Cc:
 McCaslin, Tyler; Steven Layman; Kelly Kirven

 Subject:
 RE: Follow Up on Proposed Studies

 Date:
 Wednesday, March 30, 2022 9:51:39 AM

Attachments: <u>image001.png</u>

Jim and Jackson,

We are confirmed on our end for April 22nd at 9:00 a.m. Meeting at your Armuchee office will work great.

We're of course open to rescheduling as you describe below. We will have one person coming from South Carolina but can accommodate a change with enough notice.

So that we can be well prepared for the meeting, can you provide any questions or areas of discussion that you'd like us to be prepared to cover? We are planning to walk through the recreation study as discussed during the joint meeting, but a heads up of anything in particular in addition to that would be helpful.

We're looking forward to the meeting.

Best,

cj

From: Jones, Craig

Sent: Wednesday, March 30, 2022 9:20 AM

To: 'Sibley, Jackson' <Jackson.Sibley@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com> **Subject:** RE: Follow Up on Proposed Studies

Hi Jackson,

I completely understand the field season constraints. We'll do some quick calendar checks for the 22nd and, assuming that works, are open to rescheduling as needed.

Best,

ci

From: Sibley, Jackson [mailto:Jackson.Sibley@dnr.ga.gov]

Sent: Wednesday, March 30, 2022 9:06 AM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Follow Up on Proposed Studies

External E-Mail

Hi Craig,

Thanks for the note. Being at the peak of field season between now and the end of April, Jim and I have been working to identify a meeting date and time that will not interfere with a highly variable (and weather-dependent) sampling schedule. Within your suggested window, we feel we could make the morning of Friday, April 22nd (9:00 am?) work if you all are open as well.

Additionally, we are happy to host (2650 Floyd Springs Road, Armuchee, GA 30105), or can make arrangements to meet at Rocky or elsewhere if need be.

Finally, in the event that we have an unforeseen scheduling conflict with the 22nd, would you all be open to possibly rescheduling the meeting to an inclement weather day within the 19th-29th window, given enough notice?

Thanks,

Jackson Sibley
Fisheries Biologist II
(706) 844-3676
Wildlife Resources Division
Facebook • Twitter • Instagram
Buy a hunting or fishing license today!

From: Jones, Craig < craig.jones@opc.com > Sent: Wednesday, March 30, 2022 8:26 AM

To: Hakala, Jim < <u>Jim.Hakala@dnr.ga.gov</u>>; Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Follow Up on Proposed Studies

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Good morning,

I'm just following up on the message below. We would welcome the opportunity to walk through our studies in more detail if that's helpful to GDNR.

Best,

Craig

From: Jones, Craig

Sent: Thursday, March 24, 2022 10:38 AM

To: 'Jim Hakala' <<u>Jim.Hakala@dnr.ga.gov</u>>; Sibley, Jackson <<u>Jackson.Sibley@dnr.ga.gov</u>>

Subject: Follow Up on Proposed Studies

Good Morning Jim and Jackson,

Thanks for the discussion during last week's joint meeting. I'm following up to see if we can schedule some time to discuss the questions you raised about the recreation study in more detail. I'm also happy to discuss any of the other studies in as much detail as you'd like.

Sometime between the 19th and 29th of April would work well for us. Let me know if there are some dates/times in that timeframe that work well for you. It may make sense to do this meeting in person, but I'm good with whatever works well for your team.

Looking forward to hearing from you and getting a follow-up meeting set up.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



 From:
 Jones, Craig

 To:
 Bauer, Eric F

 Cc:
 McCaslin, Tyler

Subject: RE: [EXTERNAL] Rocky Mountain FERC Consultation Meeting

Date: Tuesday, April 5, 2022 1:31:52 PM

Attachments: <u>image001.png</u>

Hi Eric,

Thanks for the follow up on the studies. We will be having some internal discussions about terrestrial methods, and I will follow up with answers to the questions you raise.

Best,

Craig

From: Bauer, Eric F [mailto:eric_bauer@fws.gov]

Sent: Monday, April 4, 2022 3:31 PMTo: Jones, Craig <craig.jones@opc.com>Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: Re: [EXTERNAL] Rocky Mountain FERC Consultation Meeting

External E-Mail

Hey Craig,

I just wanted to touch based following up from this meeting. I don't have any comments or additional study requests; the studies outlined in the study plan appear to be sufficient to assess/address any resource concerns that I have. There was mention of terrestrial studies in the presentation, but potentially that was just to be done from a boat; is that correct? Are there any plans to survey the terrestrial environment around any small streams/springs on the property during any other terrestrial surveys. Mostly I'm interested in surveys for the Cherokee Clubtail dragonfly that might be able to be surveyed concurrently with other planned surveys, so if that fits in with other surveys, then great. If not, I think as we previously discussed the Service may be interested in working with you to get access for someone to survey for that species because we have a Species Status Assessment for it coming up in 2024 and it's known from the Armuchee and adjacent watersheds. Feel free to include this email in your records to FERC. Thanks in advance.

-Eric

Eric F. Bauer, PhD (he/him) Fish and Wildlife Biologist Georgia Ecological Services US Fish and Wildlife Service RG Stephens, Jr. Federal Building 355 East Hancock Avenue, Room 320, Box 7 Athens, GA 30601

Direct Line: 706-208-7519

Office #: 706-613-9493

Teams: eric bauer@fws.gov (preferred)

From: Jones, Craig < craig.jones@opc.com>
Sent: Monday, February 21, 2022 12:57 PM
To: Bauer, Eric F < eric_bauer@fws.gov>
Cc: McCaslin, Tyler < tyler.mccaslin@opc.com>

Subject: [EXTERNAL] Rocky Mountain FERC Consultation Meeting

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Eric,

I'm following up on our discussion last week regarding the joint meeting. We will be sending out an email to our distribution list this afternoon announcing the meeting for March 16 from 2-4 and 6-8. Both meetings will be virtual. We are anticipating that most agencies will attend the afternoon session. No need to attend both, unless you'd like to.

Thanks again for the coordination, and please reach out with any questions in the meantime.

Best,

cj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



Jones, Craig Kelly Kirven; Steven Layman; McCaslin, Tyler Fwd: Follow Up on Proposed Studies Wednesday, April 13, 2022 8:16:27 AM

Sent from my iPad. Please pardon the typsos.

Begin forwarded message:

From: "Sibley, Jackson" < Jackson. Sibley@dnr.ga.gov>
Date: March 30, 2022 at 9.05.46 AM EDT
To: "Jones, Craig" < craig.jones@ope.com>, "Hakala, Jim" < Jim.Hakala@dnr.ga.gov>
Ce: "McCaslin, Tyler" < tyler_mccaslin@ope.com> Subject: RE: Follow Up on Proposed Studies

External E-Mail Hi Craig.

Thanks for the note. Being at the peak of field season between now and the end of April, Jim and I have been working to identify a meeting date and time that will not interfere with a highly variable (and weather-dependent) sampling schedule. Within your suggested window, we feel we could make the morning of Friday, April 22nd (9:00 am?) work if you all are open as well.

Additionally, we are happy to host (2650 Floyd Springs Road, Armuchee, GA 30105), or can make arrangements to meet at Rocky or elsewhere if need be.
Finally, in the event that we have an unforeseen scheduling conflict with the 22nd, would you all be open to possibly rescheduling the meeting to an inclement weather day within the 19th-29th window, given enough notice?

Jackson Sibley Fisheries Biologist II

Fisheries Biologist II
(706) 844-3676
Wildlife Resources Division https://urldefense.com/v3/_http://georgiawildlife.com/__;!!Niuz6VY15HVyER71QtgySA7KMR7dRYdmDObGKURuSLhQ5biNeyePs1BXN4etfR28vMgdxH3178s3Q2bHkGEJeEomjk6K_e8K1dDS>
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From: Jones, Craig craig.jones@ope.com
Sent: Wednesday, March 30, 2022 8:26 AM
To: Hakala, Jim Jim.Jim.Hakala@dnr.ga.gov; Sibley, Jackson Jackson.Sibley@dnr.ga.gov
Ce: McCaslin, Tyler yler.gov
Subject: RE: Follow Up on Proposed Studies

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I'm just following up on the message below. We would welcome the opportunity to walk through our studies in more detail if that's helpful to GDNR.

Best.

From: Jones, Craig

From Jones, Cang Sent: Thursday, March 24, 2022 10:38 AM To: 'Jim Hakala' «Jim.Hakala@dnr.ga.gov» mailto:Jim.Hakala@dnr.ga.gov»; Sibley, Jackson «Jackson.Sibley@dnr.ga.gov» mailto:Jackson.Sibley@dnr.ga.gov» Subject: Follow Up on Proposed Studies

Good Morning Jim and Jackson.

Thanks for the discussion during last week's joint meeting. I'm following up to see if we can schedule some time to discuss the questions you raised about the recreation study in more detail. I'm also happy to discuss any of the other studies in as

Sometime between the 19th and 29th of April would work well for us. Let me know if there are some dates/times in that timeframe that work well for you. It may make sense to do this meeting in person, but I'm good with whatever works well

Looking forward to hearing from you and getting a follow-up meeting set up.

Craig

Craig A. Jones, PhD Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912

@opc.com> Web: www.opc.com<https://urldefense om/v3/_http:/www.opc.com/__:!!HWVSVPY!zyPIFqhE3ySV5y02ymwb1Vu5KETzfhO6tAtzGSvlySqkjx_lmzi6fRbfYcfIA6-xByJuTrI\$>

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From: Sibley, Jackson

To: Jones, Craig; Hakala, Jim

McCaslin, Tyler; Steven Layman; Kelly Kirven Cc: Subject: RE: Follow Up on Proposed Studies Date: Wednesday, April 13, 2022 4:12:00 PM

Attachments: image001.png

SurveyFORM2006.xls

Rocky User 2006 running summary.xls

Survey schedule w.Heath.xls

Survey schedule.xls

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- Assess current boating access facility usage (ie. boat ramps and associated parking) to ensure user needs are being adequately and safely supported.
- Offering the survey in Spanish to accommodate Latin-X resource users

I look forward to discussing these possibilities in person,

Jackson

Jackson Sibley Fisheries Biologist II (706) 844-3676 **Wildlife Resources Division** Facebook • Twitter • Instagram Buy a hunting or fishing license today! **From:** Jones, Craig <craig.jones@opc.com> **Sent:** Wednesday, March 30, 2022 9:52 AM

To: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

Subject: RE: Follow Up on Proposed Studies

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jim and Jackson,

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So that we can be well prepared for the meeting, can you provide any questions or areas of discussion that you'd like us to be prepared to cover? We are planning to walk through the recreation study as discussed during the joint meeting, but a heads up of anything in particular in addition to that would be helpful.

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Sent: Wednesday, March 30, 2022 9:06 AM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Follow Up on Proposed Studies

External E-Mail

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Additionally, we are happy to host (2650 Floyd Springs Road, Armuchee, GA 30105), or can make arrangements to meet at Rocky or elsewhere if need be.

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Sent: Thursday, March 24, 2022 10:38 AM

To: 'Jim Hakala' <<u>Jim.Hakala@dnr.ga.gov</u>>; Sibley, Jackson <<u>Jackson.Sibley@dnr.ga.gov</u>>

Subject: Follow Up on Proposed Studies

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Looking forward to hearing from you and getting a follow-up meeting set up.

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Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: Sibley, Jackson; Hakala, Jim

Cc: McCaslin, Tyler; Steven Layman; Kelly Kirven
Subject: RE: Follow Up on Proposed Studies
Date: Thursday, April 14, 2022 8:32:32 AM

Attachments: <u>image001.pnq</u>

Hi Jackson,

Thanks for the follow up on the recreation study. We will review and be prepared to discuss next week. We're looking forward to the conversation.

Best,

Craig

From: Sibley, Jackson [mailto:Jackson.Sibley@dnr.ga.gov]

Sent: Wednesday, April 13, 2022 4:12 PM

To: Jones, Craig <craig.jones@opc.com>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

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Meeting Summary Rocky Mountain Recreation Use Analysis Study Plan

Date and Time: Friday, April 22, 2022; 9:00-11:15 a.m.

Location: Georgia Department of Natural Resources Office, Armuchee, Georgia

Participants:

Jim Hakala, Georgia Department of Natural Resources (GDNR)
Jackson Sibley, GDNR
Craig Jones, Oglethorpe Power Corporation (OPC)
Kelly Kirven, Kleinschmidt Associates
Steve Layman, Kleinschmidt

Prepared by: Steve Layman

Meeting Summary

The purpose of the meeting was to discuss the recreation field survey methodology for OPC's proposed Recreation Use Analysis and to revise the survey form to incorporate GDNR's suggestions. GDNR had conducted a similar recreation use analysis at the Rocky Mountain Recreation and Public Fishing Area (i.e., the project recreation facilities) in 2006-2007. Discussion centered around the draft survey methodology, including the design of the survey questionnaire and specific types of questions, survey locations, a separate survey questionnaire for the campground, the seasonal schedule of field surveys, and insights from GDNR's management of the facilities.



CHUCK HUFSTETLER

District 52 121-C State Capitol Atlanta, Georgia 30334 Phone: (404) 656-0034 Fax: (404) 656-6579

E-mail: chuck.hufstetler@senate.ga.gov



The State Senate

Atlanta, Georgia 30334

P-2725

April 15, 2022

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

Dear Ms. Bose:

I am pleased to support Oglethorpe Power Corporation's (OPC) proposed relicensing studies for the Rocky Mountain Pumped Storage Hydroelectric Project in Floyd County (Plant Rocky). The proposed studies appear reasonable, complement the existing information presented in OPC's Pre-Application Document, and will provide the necessary information to help make a well-informed relicensing decision.

I also want to take this opportunity to express my general support for OPC relicensing Plant Rocky. OPC and Plant Rocky are a part of the critical infrastructure of Georgia's electric grid, and a reliable contributor to the Floyd County tax base. Plant Rocky offers Northwest Georgia citizens and visitors with recreational opportunities and provides quality, stable employment for 37 people.

Oglethorpe Power's diverse generation mix plays a vital role to ensure Georgia's rural and suburban electric cooperative member-ratepayers have economical and reliable energy. Plant Rocky benefits our entire state, and Floyd County considers itself fortunate to have a community partner in OPC. OPC has been in our community for 45 years supporting things like the Coosa River Basin Initiative and scholarships for the Rome City Schools and Floyd County Schools.

Oglethorpe Power and Rocky Mountain Pumped Storage Hydro Facility are valuable corporate citizens of Floyd County and the greater Rome area. I respectfully encourage your favorable consideration of the relicensing application for the Oglethorpe Power Rocky Mountain Pumped Storage Hydroelectric Project.

Sincerely,

Chuck Hufstetler Finance Chair

Georgia State Senate

COMMITTEES:

Finance, Chairman Retirement, Vice-Chairman Health and Human Services Rules Higher Education, Ex-Officio Appropriations, Ex-Officio

REGULATORY COMMISSION

002 APR 25 P 2:

COMMISSION



Filed Date: 05/09/2022



House of Representatives

KATIE M. DEMPSEY

REPRESENTATIVE, DISTRICT 13 3 Central Plaza # 360 Rome; GA 30161-3117 EMAIL: Katie.Dempsey@house.ga.gov

245 STATE CAPITOL ATLANTA, GEORGIA 30334 (404) 463-2248 (O) (404) 463-2249 (F)

STANDING COMMITTEES

APPROPRIATIONS - CHAIRMAN OF HUMAN RESOURCES SUBCOMMITTEE **ECONOMIC DEVELOPMENT & TOURISM** ENERGY, UTILITIES & TELECOMMUNICATIONS **HEALTH & HUMAN SERVICES** HIGHER EDUCATION RULES TRANSPORTATION

May 2, 2022

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

Dear Ms. Bose:

FILED SECRETARY OF THE COMMISSION

2022 MAY -9 P 3: 0b

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FEDERAL ENERGY.

I offer my strong support for Oglethorpe Power Corporation's proposed relicensing studies for the Rocky Mountain Pumped Storage Hydroelectric Project in Floyd County (Plant Rocky). The proposed studies appear reasonable, complement the existing information presented in Oglethorpe Power Corporation's Pre-Application Document, and will provide the necessary information to help make a well-informed relicensing decision.

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Oglethorpe Power Corporation's diverse generation mix plays a vital role to ensure Georgia's rural and suburban electric cooperative member-ratepayers have economical and reliable energy. Plant Rocky benefits our entire state, and Floyd County is fortunate to have had Oglethorpe Power Corporation as a community partner for 45 years supporting the Coosa River Basin Initiative and scholarships for the Rome City Schools and Floyd County Schools.

Oglethorpe Power Corporation and Rocky Mountain Pumped Storage Hydro Facility are valuable corporate citizens of Floyd County and the greater Rome area. Therefore, I would ask for your favorable consideration of the relicensing application for the Oglethorpe Power Corporation Rocky Mountain Pumped Storage Hydroelectric Project.

Sincerely,

Katie Dempsey

State Representative

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From: <u>Jones, Craig</u>

To: Sibley, Jackson; Hakala, Jim

 Cc:
 McCaslin, Tyler; Kelly Kirven; Steven Layman

 Subject:
 RE: Follow Up on Recreation Use Analysis

 Date:
 Wednesday, May 11, 2022 6:33:08 PM

Attachments: <u>image001.png</u>

Hi Jackson,

Sounds good, thanks for the quick response. Let's do Friday 2:30 – 3:30 so we can have our full team there, if that's still good for you guys.

I'll send a Webex invite tomorrow morning. Let me know if anything changes.

Best,

cj

From: Sibley, Jackson [mailto:Jackson.Sibley@dnr.ga.gov]

Sent: Wednesday, May 11, 2022 4:31 PM

To: Jones, Craig <craig.jones@opc.com>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com> **Subject:** RE: Follow Up on Recreation Use Analysis

External E-Mail

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Many thanks,

Jackson Sibley Fisheries Biologist II (706) 844-3676

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From: Jones, Craig < craig.jones@opc.com>
Sent: Tuesday, May 10, 2022 3:39 PM

To: Hakala, Jim < Jim.Hakala@dnr.ga.gov>; Sibley, Jackson < Jackson.Sibley@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** Follow Up on Recreation Use Analysis

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Hi Jim and Jackson,

I'm reaching out to see if we can set up some time this week to follow up on our last discussion. Let me know if you guys are available. We did a quick calendar check, and the following dates/time slots work for us:

First options for us are...

Wed, 5/11: 8:00 – 9:30 a.m. Thur, 5/12: 8:00—9:00 a.m. Fri, 5/13: 2:30—5:0 0 p.m.

Second options are...

Thur, 5/12: 9:00—10:00 a.m.; 1:00-2:30 p.m.; and 4:00—5:00 p.m. Fri, 5/13: 1:00—2:30 p.m.

I'm thinking a discussion would take no more than an hour, but we probably need at least 30 minutes.

I'm available the rest of the afternoon and tomorrow morning, if you'd like to touch base prior to a conference call/webex.

Best,

cj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





MARK WILLIAMS COMMISSIONER

TED WILL DIRECTOR

May 12, 2022

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Room 1A Washington, DC 20426

RE:

Comments on Pre-Application Document (PAD)

Rocky Mountain Pumped Storage Hydropower Project (P-2725)

Dear Secretary Bose:

We appreciate the opportunity to review the Pre-Application Document (PAD), included with Oglethorpe Power Corporation's (OPC) Notice of Intent filed with your agency on December 10, 2021. Our staff attended the Joint Agency Meeting held March 16, 2022 and have since met with OPC to begin development of a recreational user survey. We support OPC's intent to conduct surveys to update the natural and recreational inventories within the project area and assess opportunities for upgrades.

We recognize that this project has impacts to the water quality, aquatic habitats and species, and recreational opportunities within and downstream of the project area. Attached are comments and recommendations related to the PAD, and we look forward to working with OPC to develop study plans that adequately characterize the natural and recreational resources and project impacts.

Sincerely

Ted Will

Cc. Jon Ambrose
Scott Robinson

4.0 EXISTING ENVIRONMENTAL AND RESOURCE IMPACTS

4.4.1.1 Distribution of Fishes in the Project Vicinity

Table 10 should be amended to reflect the non-native, invasive status of the Red Shiner, which is currently indicated to be native.

4.5 Wildlife and Botanical Resources

We request that OPC collaborate with the Georgia Department of Natural Resources Wildlife Resources Division (GADNR WRD) to update the terrestrial wildlife and botanical management plan for the project area to reflect updates to GADNR WRD management policies and implement necessary measures to protect recently surveyed botanical resources.

4.7 Rare, Threatened, and Endangered Species

Section 4.7 and Table 18 should be amended as follows:

- Include accounts of the following federal and state listed species which are historically known from Floyd County and the Little Armuchee (0315010304) HUC10 Watershed: Blue Shiner, Rock Darter, and Cherokee Clubtail.
- 2. Coldwater Darter status should be corrected to state endangered.
- 3. Crataegus trifloral is duplicated under a second common name, Rome Hawthorne, which is a different species and is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.
- 4. Lysimachia graminea is afforded no state or federal protection and should be removed from the table.
- 5. Villosa umbrans is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.

4.7.1.2 State Protected Plant and Wildlife Species

OPC states that it is unlikely that state protected aquatic species are present in the project area. Due to limited area of available habitat. We recommend revising this statement to acknowledge that Heath Creek downstream of the dam may provide suitable habitat for these and other rare species.

4.8 Recreation and Land Use

4.8.1.1 Existing Recreational Facilities

Of the approximately 5,000 acres of land and water within the Rocky Mountain Project boundary, 3,700 acres are available to the public for recreation within the Rocky Mountain Recreation and Public Fishing Area (PFA). From 2017 through 2021, GADNR WRD estimated the PFA averaged 339,500 visitors annually. The PFA and its recreational amenities are managed and operated by the GADNR WRD through contract with OPC. This unique long-term cooperative partnership has proven successful at meeting GADNR's resource management goal of providing a high quality outdoor recreational experience for the public.

4.8.1.2 Form 80 Licensed Hydropower Development Recreation Report

The PAD includes estimates of recreational use and Amenity Capacity Utilization from the FERC Licensed Hydropower Development Recreation Report (Form 80) from 2014. These statistics are presented as

daytime recreation days and nighttime recreation nights, and a peak weekend day and nighttime averages. Percent recreation capacity utilization of the various amenities at the Rocky Mountain Project in 2014 are also presented (Table 19). The Form 80 report was developed using data collected by the GADNR year-round using traffic counters and attendance records. While the Form 80 data have some limited descriptive value, they are likely insufficient for determining public recreational use patterns and provide no assessment of user satisfaction with the various components of the Project's recreation facility (PFA). More concise and updated recreational data would aid in determining current public use and satisfaction, which will be critical to guiding GADNRs future recreation management strategy over the new license period.

5.0 PRELIMINARY ISSUES AND STUDIES LIST

5.2.1.1 Water Quality Assessment

We support OPC's general water quality monitoring plan, however, we request that OPC incorporate the following recommendations into the study design:

- Collect water quality data for a period of two years to minimize effects of temporal variation in dataset.
- Georgia DNR WRD requests the ability to review the proposed water quality plan pending the
 results of the Heath Creek aquatic resources studies described in section 5.2.1.2. The proposed
 monthly sample collection may not be sufficient to assure the needs of the fishes and mussels are
 being met.

5.2.1.2 Aquatic Resources Study

We appreciate OPC's recognition that RMPSP impacts aquatic wildlife downstream of project area and their intent to conduct fish and mussel community surveys in Heath Creek. We support their decision to re-sample the GADNR Stream Survey Team site, which was last sampled in 2001 and have the following additional recommendations:

- 1. Conduct a fish survey at one additional site in Heath Creek, upstream of the GADNR site, closer to the dam.
- 2. Fish and mussel site selection and mussel survey methods should be developed in consultation with the GADNR Freshwater Biodiversity Program.

5.2.1.3 Terrestrial and Wetland Resources Survey

We support OPC's intent to update the terrestrial and botanical resources inventory within the project boundary. GADNR is involved with recent research projects within the park that have identified several non-listed plant species of conservation concern and potentially one undescribed plant species. Several unique habitats have also been noted during these studies.

We request that OPC consult with the GADNR Wildlife Conservation Section prior to developing survey methods for botanical resources.

5.2.1.4 Preliminary Studies – Recreation Use Analysis

The preliminary study proposes to analyze recreational use with a defined objective of characterizing the existing facilities and recreation use through review of existing information, contact with targeted user groups (ie. fishing, hunting, boating clubs), and description and inventory of existing facilities. Given the importance of public recreation at the Project, we believe the proposed Recreational Use Analysis (RUA) should be more robust and include collection of additional data on public use characteristics and user satisfaction levels.

Key Study Elements

- In addition to review of existing recreational use data as proposed, we recommend the RUA include an in-situ interview-based survey representative of all PFA users and not just "targeted user groups" (ie. fishing, hunting, and boating clubs). There are few such organized groups at the PFA and they are not representative of all user types.
- 2. We recommend the RUA accurately characterize current recreational user types and their satisfaction with key aspects of the PFA (ie. fishing quality, amenities)
- 3. The RUA should also include an assessment that describes key existing PFA facilities (ie. campground, beach, boat ramps), their associated amenities (ie. bathrooms/sewer infrastructure, boat ramps and associated parking, docks, cellular service quality) and their condition. We recommend the assessment also evaluate current recreational user satisfaction with those facilities/amenities and need for Americans with Disabilities Act (ADA) improvements.

The need for additional information and nexus to development of license requirements

This RUA will provide current information needed by GADNR WRD to manage the existing recreation resources of the PFA to provide a high quality public outdoor recreational experience. This information will also enable GADNR to better partner with the licensee to manage and potentially improve recreational opportunities for PFA users. The inventory of key existing PFA facilities, their associated amenities, condition, and current user satisfaction of those facilities will allow GADNR and the licensee to better evaluate several possible issues identified in GADNR's *Pre-Application Document Questionnaire for FERC Relicensing*. Those include: 1) need for Americans with Disabilities Act (ADA) accessible fishing access at Antioch and Heath Lakes; 2) safety and operational concerns associated with current cellular service at the facility; 3) crowding and safety concerns at the Heath Lake Boat Ramp given the rise and popularity of kayak use of the ramp; 4) campground and beach sewer infrastructure condition.

Proposed study methodology

As discussed in an April 22, 2022 meeting with GADNR, and OPC and Kleinschmidt representatives, the recreational use survey should be statistically valid and sufficiently robust to ensure the data collected are accurately representative of PFA users. Variables and user satisfaction levels to be assessed should be comparable to the recreational user study conducted by GADNR in 2006-2007 and shared with OPC and Kleinschmidt. A representative survey of resource users over a one-year period should be employed as opposed to surveying only "targeted user groups" (i.e. fishing, hunting, boating clubs) over an abbreviated period. The study should also account for seasonal, weather, and day of the week variability in public use. The facility assessment should describe and adequately assess key existing structure condition. User satisfaction with those amenities may be obtained during the recommended recreational user interviews.

United States Department of the Interior Fish and Wildlife Service

Georgia Ecological Services Email: GAES_Assistance@FWS.gov Website: FWS.gov/office/Georgia-Ecological-Services/

North Georgia Office 355 East Hancock Ave, Room 320, Box 7 Athens, GA 30601 Phone: (706) 613-9493 West Georgia Office P.O. Box 52560 Ft. Benning, GA 31995-2560 Phone: (706) 544-6030 Fax: (706) 544-6419 Coastal Georgia Office 4980 Wildlife Drive NE Townsend, GA 31331 Phone: (912) 832-8739

May 13, 2022

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

Subject: Study Plans and Request for Studies for the Rocky Mountain Pumped Storage Hydropower Project, FERC Project Number P-2725-075

Dear Ms. Bose:

On March 16, 2022 Oglethorpe Power Corporation (OPC) held a joint meeting to discuss study plans for the upcoming relicensing of the Rocky Mountain Pumped Storage Hydropower Project. We, the Fish and Wildlife Service (Service), submit the following comments pursuant to the authorities of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. § 1531 et seq.), the Fish and Wildlife Coordination Act (16 U.S.C. § 661 et seq.), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), and the Federal Power Act (16 U.S.C. § 791a, et seq.).

After discussion with regional partners, we recognize that there is a lack of continuous water quality monitoring in the Upper Coosa River basin, a basin inhabited by many Threatened and Endangered species. Increasing the coverage of continuous water quality data that can help inform restoration, recovery, and management actions across the basin is a priority of the Service and several other organizations that are members of the Partnership for the Upper Coosa River Basin. Heath Creek specifically, occurs in the Armuchee Creek watershed where several Threatened and Endangered species have been recorded or could occur including, but not limited to, the finelined pocketbook (*Hamiota atilis*), interrupted rocksnail (*Leptoxis foremani*), southern clubshell (*Pleurobema decisum*), southern pigtoe (*Pleurobema georgianum*), rayed kidneyshell (*Ptychobranchus foremanianus*), and the trispot darter (*Etheostoma trisella*). Additionally, several state protected or imperiled species occur in either Heath Creek or the Armuchee Creek watershed including the Coosa fiveridge (*Amblema elliottii*), greensaddle crayfish (*Cambarus manningi*), cylinder campeloma (*Campeloma regulare*), Etowah heelsplitter (*Lasmigona etowaensis*), cylindrical Lioplax (*Lioplax cyclostomaformis*), brook hornsnail (*Pleurocera*

vestita), ridged mapleleaf (Quadrula rumphiana), Cherokee clubtail (Stenogomphurus consanguis), Alabama rainbow (Villosa nebulosa), Coosa creekshell (Villosa umbrans), rock darter (Etheostoma rupestre), lined chub (Hybopsis lineapunctata), least brook lamprey (Lampetra aepyptera), mountain shiner (Lythrurus lirus), and burrhead shiner (Notropis asperifrons). Therefore, the Heath Creek and the Armuchee Creek watershed contain a high diversity of imperiled, protected, threatened, or endangered aquatic species and thus continuous water quality monitoring data would be essential for natural resource agencies in protecting, managing, and restoring populations of these species.

Heath Creek below the Rocky Mountain Pumped Storage Hydropower Project is currently a 303d listed stream according to Georgia Environmental Protection Division due to fecal coliform from non-point sources (upstream farms and agriculture) in the watershed. The relatively high levels of fecal coliform are indicative of the presence of fecal material and thus excess organic matter in the stream and watershed. Excess organic matter can lead to depleted oxygen concentrations which can be detrimental or deadly to aquatic organisms. Beneficial flushing of excess organic material and fecal coliform, and therefore dissolved oxygen concentrations, are heavily influenced by hydrology which could be impacted by dam releases and operations (e.g., minimum flows).

Based on the above information, the Service requests that the FERC consider requiring that Oglethorpe Power Corporation fund water quality sensors (Specific Conductivity, Water Temperature, and Dissolved Oxygen) on United States Geological Survey (USGS) discharge gauge 02388320 (0.3 miles downstream of the project outflow) for the duration of the project license. These sensors would provide continuous real-time data that could be used by and OPC for a water quality study about the impact of project operations on water quality, as part of the relicensing process, and provide data that all resource agencies could use to determine habitat suitability for imperiled species. Such real-time continuous data is much better at accurately assessing water quality across various hydrological conditions and improve the ability to establish causal mechanisms influencing water quality, whereas instantaneous grab-type sampling is usually insufficient for such studies and is primarily dependent on the prevailing hydrological and weather conditions at the time of sampling.

Sincerely,

Peter Maholland Acting Field Supervisor

Meeting Summary Rocky Mountain Recreation Study Discussion

Date and Time: Friday, May 13, 2022; 2:30 pm

Location: Virtual Meeting (Webex)

Participants:

Jim Hakala, Georgia Department of Natural Resources (GDNR)
Jackson Sibley, GDNR
Craig Jones, Oglethorpe Power Corporation (OPC)
Kelly Kirven, Kleinschmidt Associates
Steve Layman, Kleinschmidt

Prepared by: Steve Layman

Meeting Summary

OPC and GDNR continued discussing the recreation field survey methodology for OPC's proposed Recreation Use Analysis. OPC described its proposed survey schedule, staffing, and rationale. GDNR described its preferences for stratifying the survey schedule to represent seasonal use. Discussion also included how the survey data could be used to support management decisions. The survey form will include similar/comparable questions to those asked in GDNR's 2006-2007 user survey and additional questions previously discussed.

From: Sibley, Jackson

To: <u>Jones, Craig; Hakala, Jim</u>

Cc: McCaslin, Tyler; Kelly Kirven; Steven Layman

Subject: RE: Follow Up on Recreation Use Analysis

Date: Friday, May 13, 2022 8:17:51 AM

Attachments: <u>image001.png</u>

External E-Mail

Craig,

Sounds great. See you this afternoon.

Best,

Jackson Sibley Fisheries Biologist II (706) 844-3676

Wildlife Resources Division

<u>Facebook</u> • <u>Twitter</u> • <u>Instagram</u>

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From: Jones, Craig <craig.jones@opc.com> Sent: Wednesday, May 11, 2022 6:33 PM

To: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>;

Steven Layman <Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: Follow Up on Recreation Use Analysis

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jackson,

Sounds good, thanks for the quick response. Let's do Friday 2:30 - 3:30 so we can have our full team there, if that's still good for you guys.

I'll send a Webex invite tomorrow morning. Let me know if anything changes.

Best,

ci

From: Sibley, Jackson [mailto:Jackson.Sibley@dnr.ga.gov]

Sent: Wednesday, May 11, 2022 4:31 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com>

Subject: RE: Follow Up on Recreation Use Analysis

External E-Mail

Hi Craig,

Jim and I are good with either slot tomorrow afternoon (Thurs, 5/12) but could be available for either Friday afternoon (5/13) slot if need be.

Many thanks,

Jackson Sibley
Fisheries Biologist II
(706) 844-3676
Wildlife Resources Division
Facebook • Twitter • Instagram
Buy a hunting or fishing license today!

From: Jones, Craig < craig.jones@opc.com>
Sent: Tuesday, May 10, 2022 3:39 PM

To: Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** Follow Up on Recreation Use Analysis

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jim and Jackson,

I'm reaching out to see if we can set up some time this week to follow up on our last discussion. Let me know if you guys are available. We did a quick calendar check, and the following dates/time slots work for us:

First options for us are...

Wed, 5/11: 8:00 – 9:30 a.m. Thur, 5/12: 8:00—9:00 a.m. Fri, 5/13: 2:30—5:0 0 p.m.

Second options are...

Thur, 5/12: 9:00—10:00 a.m.; 1:00-2:30 p.m.; and 4:00—5:00 p.m.

Fri, 5/13: 1:00—2:30 p.m.

I'm thinking a discussion would take no more than an hour, but we probably need at least 30 minutes.

I'm available the rest of the afternoon and tomorrow morning, if you'd like to touch base prior to a conference call/webex.

Best,

cj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: <u>Hakala, Jim; Sibley, Jackson</u>

 Cc:
 McCaslin, Tyler; Steven Layman; Kelly Kirven

 Subject:
 Working Draft of Potential Recreation Survey

Date: Friday, May 13, 2022 3:56:06 PM

Attachments: <u>image003.png</u>

OPC Recreation Use Survey revised DRAFT.pdf

OPC Recreation Use Survey camp version DRAFT TO GDNR.pdf

Hi Jim and Jackson,

Thanks again for the productive conversation today. Attached are the working drafts of the surveys we discussed. The survey questions mirror those asked in 2006-2007 plus the additional questions we discussed in April .

Please reach out with any questions. Since these are working drafts, we ask that you do not distribute.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey

Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Ma	ain Beacl	n	_ Heath	Da	te:			Time	:	
Interviewer:										
Vehicle Type: Vehicle w/ Trailer				Vehi	_Vehicle w/o TrailerRV/Camper					
1. What is your cou	unty and state of	of resid	dence?	Co	unty:			St	ate:	
2. What is your zip	code?									
3. How many peop	le (including yo	ou) are	in you	grou	p toda	ıy?	pe	eople		
4. What is your age	e?	1	L8-24		_25-34	1 _	35-	44	45-54	55+
5. If you came with others, what are their age groups? (check all that apply)										
Children (Infai			13-17)		Adu	lts (18-5	55)	Sen	ior Adults (over 55)
6. How did you hea	ar about the are	ea?								
Friend/Relati			_Social N							Other
7. How many time	s (including tod	ay), ha	ave you	visite	d Roc	ky Mtn	PFA in	the last	30 days?	
8. What is the prin	ary reason for	your v	isit tod	ay? (c	heck a	III that a	apply)			
Boat Fishing	Picnicking			Hi	king			Car	noeing/kay	aking
Bank Fishing	Swimming	3		Bi	king			Wil	dlife viewi	ng
Camping	Hunting			Plo	easure	Boatin	g	Sho	reline rela	xation
Other:										
9. If you came to fi	sh today, how	would	you rat	e you	r fishi	ng expe	rience	?		
Very Good (5)	Good (4)		Fai	ir (3)		P	oor (2)		Very	Poor (1)
10. If you came to fish today, where did you fish?										
Antioch Lake EastAntioch Lake West Heath Lake										
11. If you came to	11. If you came to hunt today, how would you rate your hunting experience?									
Very Good (5)	Good (4)		Fai	ir (3)		P	oor (2)		Very	Poor (1)
12. Please rate the quality of the existing facilities at this access area. (choose one for each)										
Parking:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
Boat Ramp:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
Docks:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
Restrooms:	Very Good	(5)	Goo	d (4)	 	air (3)	P	oor (2)	Very	Poor (1)
Bank Fishing:	Very Good	(5)	Goo	d (4)	 	air (3)	P	oor (2)	Very	Poor (1)
Beach:	Very Good	(5)	Goo	d (4)	 	air (3)	P	oor (2)	Very	Poor (1)
Picnic Areas:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
Campsites:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
Trails:	Very Good		Goo	d (4)	F	air (3)	P	oor (2)		Poor (1)
Cleanliness:	Very Good	(5)	Goo	d (4)	F	air (3)	P	oor (2)	Very	Poor (1)
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other										
comments or suggestions.										

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey

Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:				Time:					
1. What is your county and state of residence?			County:			Sta	te:		
2. What is your zip	code?								
2. How many peop	le (including you) a	re in your	group	today	?	реор	le		
3. What is your age	e?	_18-24	2	5-34		35-44		45-54	55+
4. If you came with	others, what are th	neir age gr	oups?	(chec	k all t	hat apply)			
Children (Infar	nts-12)Youth	(13-17)	/	Adults	(18-5	5)	Senio	r Adults (d	over 55)
5. How would you	rate the online boo	king expe	rience	for ca	mping	reservati	ons?		
Very Good (5)	Good (4)	Fair	(3)		F	Poor (2)		Very	Poor (1)
6. What activities a	are you participating	g in while	campir	ng? (cl	neck a	III that app	oly)		
Boat Fishing	Picnicking		H	iking				Canoeing/	kayaking
Bank Fishing	Swimming		Bi	iking			Wildlife Viewing		
Hunting	Pleasure Boati	ng	Si 	norelir	ne rela	axation		Other (list	below):
7. While camping at Rocky Mountain PFA, are you staying in:									
Tent	RV			Tent/F	RV Cor	nbo		Group Ca	mp
8. Please rate the o	quality of the existing	ng camping	g facilit	ties. (d	choose	e one desc	riptio	n for eacl	n)
Campsite:	Very Good (5)	Good	(4)	Fa	ir (3)	Poo	r (2)	Very	Poor (1)
Playground:	Very Good (5)	Good	(4)	Fa	ir (3)	Poo	r (2)	Very	Poor (1)
Restrooms:	Very Good (5)	Good	l (4)	Fa	ir (3)	Poo	r (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Good	(4)	Fa	ir (3)	Poo	r (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Good	(4)	Fa	ir (3)	Poo	r (2)	Very	Poor (1)
9. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and									
any other comments or suggestions.									

ORIGINAL



House of Representatives

EDDIE LUMSDEN
REPRESENTATIVE, DISTRICT 12
POST OFFICE BOX 122
ARMUCHEE, GEORGIA 30105
(706) 232-1870 (H)
(706) 506-3360 (C)
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STATE CAPITOL SUITE 220-A ATLANTA, GEORGIA 30334 (404) 656-7850 (404) 463-4221 (fax) STANDING COMMITTEES:
INSURANCE – CHAIRMAN
EDUCATION APPROPRIATIONS
PUBLIC SAFETY APPROPRIATIONS
BUDGET & FISCAL AFFAIRS OVERSIGHT
GOVERNMENTAL AFFAIRS
HUMAN RELATIONS & AGING
PUBLIC SAFETY & HOMELAND SECURITY
RULES

SECRETARY OF T COMMISSION TREGULATORY COMMISSION

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May 4, 2022

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

Dear Ms. Bose:

I am pleased to support Oglethorpe Power Corporation's (OPC) proposed relicensing studies for the Rocky Mountain Pumped Storage Hydroelectric Project in Floyd County (Plant Rocky). The proposed studies appear reasonable, complement the existing information presented in OPC's Pre-Application Document, and will provide the necessary information to help make a well-informed relicensing decision.

I also want to take this opportunity to express my general support for OPC relicensing Plant Rocky. OPC and Plant Rocky are a part of the critical infrastructure of Georgia's electric grid, and a reliable contributor to the Floyd County tax base. Plant Rocky offers Northwest Georgia citizens and visitors with recreational opportunities and provides quality, stable employment for 37 people.

Oglethorpe Power's diverse generation mix plays a vital role to ensure Georgia's rural and suburban electric cooperative member-ratepayers have economical and reliable energy. Plant Rocky benefits our entire state, and Floyd County considers itself fortunate to have a community partner in OPC. OPC has been in our community for 45 years supporting things like the Coosa River Basin Initiative and scholarships for the Rome City Schools and Floyd County Schools.

Oglethorpe Power and Rocky Mountain Pumped Storage Hydro Facility are valuable corporate citizens of Floyd County and the greater Rome area. I respectfully encourage your favorable consideration of the relicensing application for the Oglethorpe Power Rocky Mountain Pumped Storage Hydroelectric Project.

And the first of the state of the state of

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A CONTRACTOR CONTRACTOR OF CONTRACTOR OF THE CON

Sincerely,

Eddie Lumsden

State Representative

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Document Accession #: 20220519-0020 Filed Date: 05/19/2022

From: Kelly Kirven

To: Sibley, Jackson; Jones, Craig; Hakala, Jim

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: RE: Working Draft of Potential Recreation Survey

Date: Thursday, May 26, 2022 1:41:24 PM

Attachments: <u>image003.png</u>

External E-Mail

Hi Jackson,

We agree with your suggestions listed below and will revise the surveys accordingly. Regarding the campground survey, we plan to install a drop-box at the campground check-in area so that folks can fill out the survey while staying on-site and drop it in the box upon leaving (or whenever they can during their stay).

Thank you for your suggestions and your continued participation in this relicensing process. Please don't hesitate to reach out with other questions.

Kelly

Kelly Kirven

Section Manager – Terrestrial/Aquatics

Kleinschmidt
Office: 803.462.5633
Cell: 423.747.2660

www.KleinschmidtGroup.com

From: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>

Sent: Wednesday, May 25, 2022 10:04 AM

To: Jones, Craig <craig.jones@opc.com>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

Subject: RE: Working Draft of Potential Recreation Survey

Hi Craig,

We've had a chance to look through the survey drafts. Overall they look good, we have just a few suggestions that we would like to see implemented prior to starting the survey:

General Survey

- Remove question 2 (zip code)
- Question 3 should read "How many people are in your vehicle today?" to avoid ambiguity/misinterpretation
- Question 4, first block should read "16-24"
- Question 10 should include "check all that apply"

Campground Survey

- Remove "first" question 2 (zip code) and re-number
- Second question 2 (should be labeled Question 3) should read "How many people are staying in your campsite tonight?" to avoid ambiguity/misinterpretation
- We would like to see Questions 9 and 10 from the General Survey included in this survey to obtain fishing quality information from campground users

For both surveys, we would like to see included a "permit type" question to estimate unpermitted visitation. This question should have the options "None" "Daily" "Annual" and "Campground" and include "check all that apply."

Beyond this, our only other point of clarification was whether the campground survey was intended to be in-person or in a survey card format?

Feel free to call to discuss if you have any questions.

Best,

Jackson

Jackson Sibley
Fisheries Biologist II
(706) 844-3676
Wildlife Resources Division
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From: Jones, Craig <<u>craig.jones@opc.com</u>>

Sent: Friday, May 13, 2022 3:56 PM

To: Hakala, Jim < "> Sibley, Jackson < Jackson.Sibley@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: Working Draft of Potential Recreation Survey

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jim and Jackson,

Thanks again for the productive conversation today. Attached are the working drafts of the surveys we discussed. The survey questions mirror those asked in 2006-2007 plus the additional questions we discussed in April .

Please reach out with any questions. Since these are working drafts, we ask that you do not distribute.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: Jim.Hakala@dnr.state.ga.us; Sibley, Jackson
Cc: McCaslin, Tyler; Steven Layman; Kelly Kirven
Subject: Meeting to Discuss Study Methods
Date: Wednesday, June 8, 2022 12:18:15 PM

Attachments: <u>image001.png</u>

Hi Jim and Jackson,

I'm reaching out to see if we can find some time next week to discuss study methodologies. We are planning to begin both the water quality and recreation work at the end of the month and would like to discuss your comment letter before that work begins, especially as it relates to methods. We'll also be prepared to discuss the terrestrial/botanical and fisheries studies, if you'll have the necessary staff available.

We are generally available Wednesday through Friday next week. Ideally, we would meet at your Armuchee office again, but a Webex or conference call would also work well as an alternative or supplement for those who can't meet in person. Let me know if you have availability over those three days. A two-hour meeting should be more than sufficient, although we may need another hour if we have an opportunity to discuss all the studies.

I look forward to meeting with you again.

Best,

сj

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig
To: Hakala, Jim

Cc: McCaslin, Tyler; Steven Layman; Kelly Kirven; Sibley, Jackson

Subject: RE: Meeting to Discuss Study Methods

Date: Wednesday, June 8, 2022 2:50:01 PM

Attachments: <u>image001.png</u>

image002.png

Hi Jim,

EPD did not file a comment letter, and the USFWS letter was more of request to FERC. As a result, our focus at this time is on DNR's comments. No other substantive study-related comments were filed.

Let me know if you'd like to set up a call to discuss in more detail.

Best,

ci

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Hakala, Jim [mailto:Jim.Hakala@dnr.ga.gov]

Sent: Wednesday, June 8, 2022 2:30 PM **To:** Jones, Craig <craig.jones@opc.com>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>;

Sibley, Jackson Jackson.Sibley@dnr.ga.gov

Subject: RE: Meeting to Discuss Study Methods

External E-Mail

Craig,

Will you also me consulting with other entities (ie. USFWS, EPD) who may have also provided comment regarding the proposed studies?

Thanks,

Jim

Jim Hakala

Northwest Georgia Region Fisheries Supervisor

Wildlife Resources Division

(706) 295-6102

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GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Jones, Craig < craig.jones@opc.com > Sent: Wednesday, June 8, 2022 1:49 PM
To: Hakala, Jim < Jim. Hakala@dnr.ga.gov >

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>;

Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Subject: RE: Meeting to Discuss Study Methods

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sounds good. Thanks, Jim. cj

From: Hakala, Jim [mailto:Jim.Hakala@dnr.ga.gov]

Sent: Wednesday, June 8, 2022 1:15 PM **To:** Jones, Craig < craig.jones@opc.com>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>;

Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Subject: RE: Meeting to Discuss Study Methods

External E-Mail

Craig,

Good afternoon! Since this discussion will branch out from the Recreational Use Analysis, I need to check the availability of our other staff. Staff availability may also dictate meeting format (ie. inperson or virtual). Let me run this by our folks and see what their availability if for next week.

Talk to you soon,

Jim

Jim Hakala

Northwest Georgia Region Fisheries Supervisor

Wildlife Resources Division

(706) 295-6102

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A division of the

GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Jones, Craig < craig.jones@opc.com>
Sent: Wednesday, June 8, 2022 12:18 PM

To: Hakala, Jim <Jim.Hakala@dnr.ga.gov; Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: Meeting to Discuss Study Methods

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jim and Jackson,

I'm reaching out to see if we can find some time next week to discuss study methodologies. We are planning to begin both the water quality and recreation work at the end of the month and would like to discuss your comment letter before that work begins, especially as it relates to methods. We'll also be prepared to discuss the terrestrial/botanical and fisheries studies, if you'll have the necessary staff available.

We are generally available Wednesday through Friday next week. Ideally, we would meet at your Armuchee office again, but a Webex or conference call would also work well as an alternative or supplement for those who can't meet in person. Let me know if you have availability over those three days. A two-hour meeting should be more than sufficient, although we may need another hour if we have an opportunity to discuss all the studies.

I look forward to meeting with you again.

Best,

сj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig
To: Hakala, Jim

 Cc:
 McCaslin, Tyler; Steven Layman; Kelly Kirven

 Subject:
 Working Draft Study Plans/Methods

 Date:
 Wednesday, June 15, 2022 4:27:34 PM

Attachments: <u>image002.png</u>

Rocky Mountain Draft Study Plans 06-15-2022 DNR.pdf

Hi Jim,

Attached is a draft version of our study plans. The document is still a working draft and subject change, but I wanted to make sure you had an opportunity to review prior to our meeting tomorrow.

I look forward to our discussion. Please reach out if you have any questions you'd like me to address prior to the meeting.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

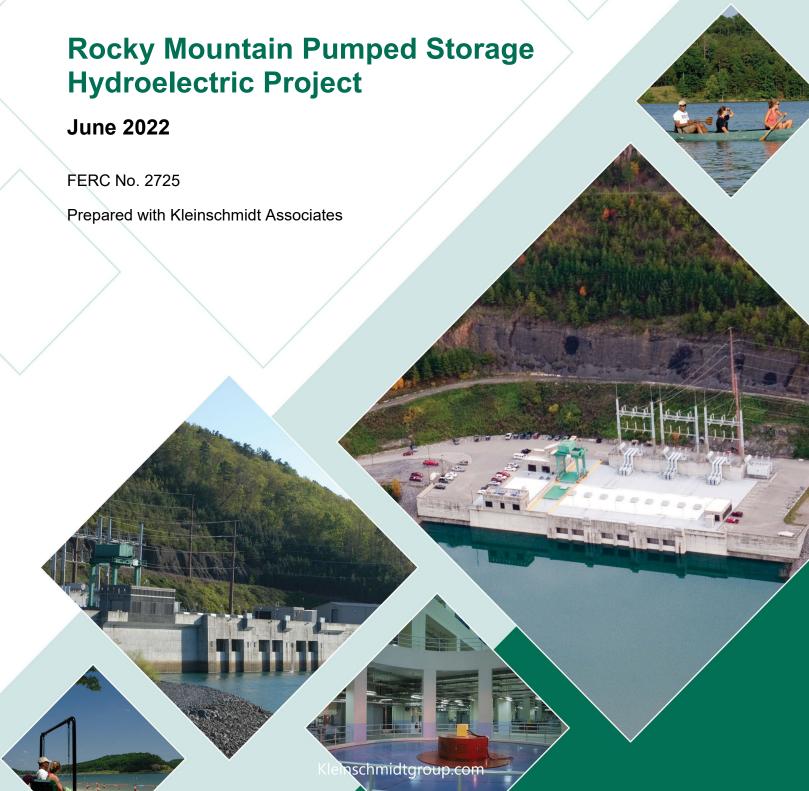


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June 2022 iii

1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

June 2022 Project Control No. 0498003.01

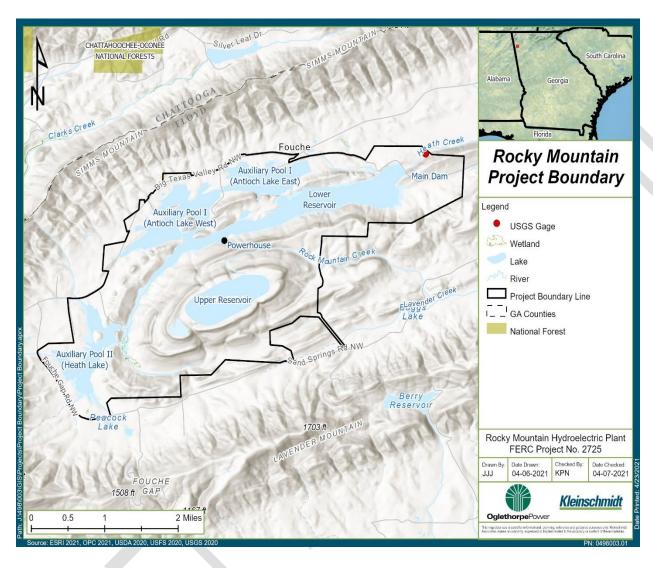


Figure 1 Project Boundary Map

2.0 WATER QUALITIY ASSESSMENT

OPC will conduct a study characterizing existing water quality at the Rocky Mountain Project. The study will supplement the existing robust water quality data set available for the Project, as summarized in the PAD, and will be accomplished through a combination of new water quality monitoring at representative locations within the project boundary and compilation and analysis of existing water quality data.

2.1 Objectives

The specific objectives of this study are to:

- Characterize existing water quality in the Rocky Mountain study area.
- Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application.

2.2 Study Area

The study area includes the Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary.

2.3 Methodology

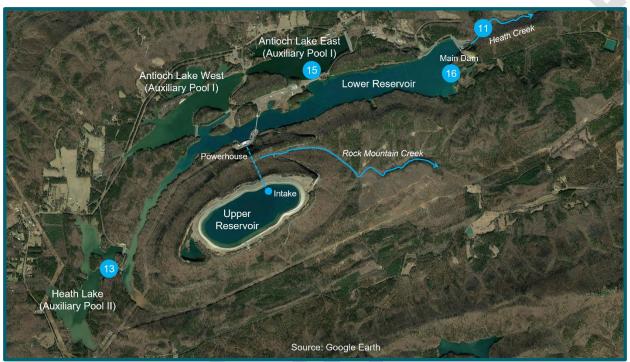
OPC's approach to the water quality assessment consists of the following study elements:

- Compile and analyze water quality data collected by OPC and GDNR at the Project between 1996 and 2020.
- Conduct one year of monthly water quality monitoring at four historic stations within the project boundary to characterize current conditions.

Monthly water quality monitoring will be conducted from June 2022 through May 2023 at historic stations RM11 (Heath Creek downstream of Main Dam), RM13 (Heath Lake), RM15 (Antioch Lake East), and RM16 (Lower Reservoir near the Main Dam) (Figure 2). The Upper Reservoir is not included in monitoring because it exchanges a large volume of water daily with the Lower Reservoir, both reservoirs fluctuate substantially and remain well mixed throughout the water column, and Lower Reservoir water quality is therefore also representative of Upper Reservoir water quality. Rock Mountain Creek is not included

June 2022 2-1

in monitoring because there is no outlet from the Upper Reservoir to the creek and previous water quality sampling in Rock Mountain Creek has indicated that water quality of the creek is unaffected by project operation.



Blue circles indicate station numbers RM11, RM13, RM15, and RM16.

Figure 2 Proposed Water Quality Monitoring Stations in 2022-2023

Monthly water quality monitoring will include *in-situ* measurements of water temperature, dissolved oxygen (DO) concentration, pH, specific conductance, and turbidity using an electronic multi-parameter water quality measurement sonde. Measurements will be taken at a depth of 1 meter (m) at the impoundment stations (RM13, RM15, and RM16) and at mid-depth in Heath Creek (RM11). The water quality measurement sonde will be calibrated prior to each monitoring event.

During each monthly event, grab samples of water also will be collected at 1-m depth at the impoundment stations and at mid-depth in Heath Creek and analyzed in the laboratory for 5-day biological oxygen demand, ammonia, inorganic nitrogen (nitratenitrite), total Kjeldahl nitrogen, ortho-phosphate, and total phosphorus.

For the Heath Creek monitoring location, to be responsive to FWS's request for continuous monitoring and address GDNR's comment about minimizing the effects of temporal variation of monthly water quality data collection, OPC will conduct continuous

monitoring of DO concentration and water temperature in Heath Creek downstream of the Main Dam (RM11) for one year beginning in June 2022. A dissolved oxygen data logger will be placed in the stream within the direct influence of releases from the Main Dam and where the channel cross section is relatively uniform in depth and the water well mixed. Placement of the data logger will be determined in consultation with GDNR and based on field measurements of DO within the reach between the Main Dam and USGS gage during the initial water quality monitoring event. The data logger will record DO and water temperature every hour and will be downloaded and maintained monthly throughout the monitoring period.

A Water Quality Assessment Report will be prepared and provided to stakeholders with the Draft License Application (DLA) for review and comment. The monitoring results and historic water quality data will be summarized in tables and figures and analyzed with respect to applicable state water quality criteria and any evident water quality trends related to project operations and maintenance or project-related recreation.

Additionally, OPC will evaluate the results of the Water Quality Assessment in conjunction with the results of the fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GDNR and FWS to determine whether a second year of water quality monitoring is warranted.

2.4 Schedule

The Water Quality Assessment study will be completed according to the milestones in Table 1.

Table 1 Schedule for Water Quality Assessment

Activity	Date or Deadline
Begin data compilation and monthly sampling	June 2022
Complete one year of monthly sampling	May 2023
Prepare study report	December 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.0 AQUATIC RESOURCES STUDY

OPC will conduct a study characterizing the existing communities of fish and mussels in Heath Creek downstream of the Project for evaluating the effects of continued project operation on aquatic habitat downstream. The study will be accomplished through a fish community survey and a freshwater mussel survey, to be conducted in 2022.

3.1 Objectives

The specific objectives of this study are to:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project.
- Develop aquatic resources information sufficient for analyzing the effects of continued project operation on aquatic habitat downstream of the project in the license application, including assessing the presence/absence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails.

3.2 Study Area

The study area includes Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek, a reach of approximately 5 miles (Figure 3).

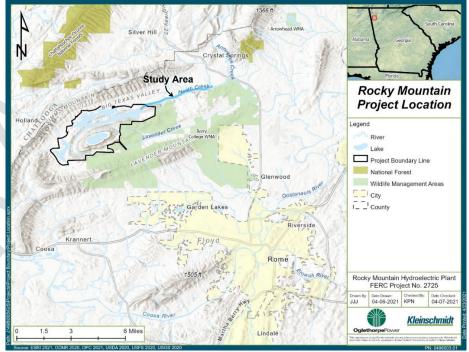


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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3.3 Methodology

OPC's approach to the aquatic resources study includes the following key elements.

Fish Community Survey

Consistent with GDNR recommendations fish community sampling will be conducted at two representative locations on Heath Creek in 2022, including a station near the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) within the project boundary and a station previously surveyed by the GDNR Stream Team in 2001-2002 located about 2.5 miles downstream of the Main Dam at Texas Valley Road. Each station will be surveyed once during the period June-September 2022 following the GDNR's Standard Operating Procedures (SOP) for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GDNR 2020a).

Prior to sampling, reconnaissance and stream measurements will take place at each sampling to station calculate mean stream width (MSW). Reach of stream to be sampled will be 35 times the MSW. Additionally, MSW will be used to determine the number of backpack electrofishing units (BPEFs) and netters required to efficiently sample the area in accordance with the referenced SOP.

The fisheries sampling will take place in an upstream direction starting at the downstream end of the sampling reach. Collected fish will be identified to species, enumerated, weighed, and returned to the stream. The fish community data will be analyzed using the multi-metric Index of Biotic Integrity (IBI) to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion (GDNR 2020b). The IBI integrates characteristics of the fish community, population, and individuals to assess fish health and biologic integrity. Metrics are based on species richness, evenness, feeding guilds, habitat use, species sensitivity or tolerance to pollutants. Total IBI scores will fall within one of five integrity classes (excellent, good, fair, poor, or very poor) and will be compared to the IBI scores obtained by the GDNR Stream Team for Heath Creek in 2001-2002.

Freshwater Mussel Survey

A survey for mussels and aquatic snails will be conducted in representative habitats in Heath Creek in 2022 to characterize the occurrence, distribution, relative abundance, and species richness of the native freshwater mollusk community. The survey will include habitats with potential to support RTE species of mussels and snails (mollusks). Based on known element of occurrence records (historic or present) and species range and habitat data, ten state and/or federally protected mollusk species, and one mussel species under federal review for listing, potentially occur in the project vicinity, including several species with historic occurrence records in the Armuchee Creek watershed, and therefore, potential to occur in Heath Creek (Table 2).

Table 2 Rare, Threatened, and Endangered Freshwater Mollusk Species with Known Records of Occurrence in Floyd County

Scientific Name	Common Name	Federal Status ^a	Georgia Status ^b
Mussels:			
Elliptio arca	Alabama spike		E
Hamiota altilis	Finelined pocketbook	LT	Т
Medionidus acutissimus	Alabama moccasinshell	LT	E
Medionidus parvulus	Coosa moccasinshell	LE	E
Pleurobema decisum	Southern clubshell	LE	E
Pleurobema georgianum	Southern pigtoe	LE	E
Ptychobranchus foremanianus	Rayed kidneyshell	LE	E
Ptychobranchus greenii	Triangular kidneyshell	LE	
Villosa umbrans	Coosa creekshell	UR	R
Snails:			
Leptoxis foremani	Interrupted rocksnail	LE	E
Pleurocera showalteri	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

The survey will be conducted by a team of biologists experienced in the collection of freshwater mussels and snails led by a malacologist who brings extensive knowledge of the mollusk fauna of the Coosa River basin in Georgia, under the authority of scientific collecting permits issued by GDNR and FWS.

^b Georgia state status: E = endangered; T = threatened; R = rare.

The search reach on Heath will extend from the Main Dam downstream approximately 5 stream miles to the confluence with Little Armuchee Creek. Using snorkeling gear, surveyors will begin at the downstream end of the reach and work upstream bank to bank. All live mussels and snails will be identified to species and returned to the substrate where they were found. Substrate characteristics along the study reach will be documented. All mussels will be measured to the nearest millimeter (long axis). The survey will take place in June-September 2022.

At least one voucher specimen of each mussel species found fresh dead will be retained and deposited at a regional malacological collection. Live mussels will be photographed and returned to the river bottom where they were found. FWS and GDNR will be notified within 24 hours if a federally protected species is found in the survey area.

Reporting

An Aquatic Resources Study Report will be prepared that characterizes aquatic resources present in Heath Creek downstream of the Project. A separate freshwater mussel survey report will be appended to the study report, and the mussel survey findings will be summarized in the main study report. The fish and mussel survey results will be presented in tables and figures, as appropriate, and analyzed with respect to species occurrence, species richness, relative abundance, biotic integrity, and other community attributes. The study results will be used in the DLA to analyze the effects of continued project operation on aquatic resources downstream of the Project.

3.4 Schedule

The Aquatic Resources Study will be completed according to the milestones in Table 3.

Table 3 Schedule for Aquatic Resources Study

Activity	Date or Deadline
Conduct fish community survey	June-September 2022
Conduct mussel survey	June-September 2022
Prepare study report	February 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.5 References

GDNR (Georgia Department of Natural Resources). 2020a. Part I: Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Stream in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

GDNR (Georgia Department of Natural Resources). 2020b. Part IV: Scoring Criteria for the Index of Biotic Integrity to Monitor Fish Communities in Wadeable Stream in the Coosa and Tennessee Drainage Basin of the Ridge and Valley Ecoregion in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

4.0 TERRESTRIAL AND WETLAND RESOURCES SURVEY

OPC will conduct a study to characterize existing terrestrial wildlife and botanical resources and wetlands and riparian resources at the Rocky Mountain Project through a field reconnaissance survey and the use of existing information and data. This study plan combines wildlife and botanical resources as described in Section 4.5 of the PAD; wetlands, riparian, and littoral habitat as described in Section 4.6 of the PAD; and RTE terrestrial plants and wildlife as described in Section 4.7 of the PAD into a single consolidated survey effort.

4.1 Objectives

The specific objectives of this study are to:

- Describe terrestrial wildlife and botanical resources occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Describe floodplain, wetlands, and riparian habitats occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Prepare a map of the principal vegetation community types in the project boundary, including wetlands.
- Identify potentially suitable habitat for RTE species of plants and animals in the project boundary.
- Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and terrestrial RTE species of plants and wildlife in the license application.

4.2 Study Area

The study area includes the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

4.3 Methodology

OPC's approach to the terrestrial and wetland resources survey consists of the following study elements.

4-1

June 2022

Review of Existing Information

Descriptions of existing terrestrial and wetland resources in the study area (i.e., wildlife and botanical resources; wetlands, riparian, and littoral habitat; and terrestrial RTE plant and wildlife species) will be based on review of existing information summarized in the PAD, including, but not limited to, the following sources:

- Terrestrial Management Plan for the Rocky Mountain Project (GDNR 2013)
- The Natural Communities of Georgia (Edwards et al. 2013)
- Georgia State Wildlife Action Plan (GDNR 2015)
- GDNR's online Georgia Biodiversity Portal
- USFWS Environmental Conservation Online System
- Field Guide to the Rare Plants of Georgia (Chafin 2007)
- Georgia Exotic Pest Plant Council's list of non-native plants in Georgia
- National Audubon Society's Christmas bird count historical data
- USFWS National Wetlands Inventory (NWI) data
- USGS topography
- Google Earth aerial imagery

Field Reconnaissance Survey

A field reconnaissance survey of the study area, concentrating mainly on uplands and wetlands around the project waters and project recreation areas will be conducted in appropriate seasons to observe representative terrestrial and wetland vegetive communities and associated wildlife habitat. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources in the major vegetative community types identified in the Terrestrial Management Plan for the Project (GDNR 2013), and in fall 2022 and spring 2023 to survey for RTE plant species flowering in those seasons.

Teams of two biologists/ecologists will visually assess upland, wetland, and riparian communities, by boat along the shorelines of the Lower Reservoir and Auxiliary Pools and by pedestrian surveys of project recreation areas and floodplains of Heath Creek and other streams, wetlands, and potentially unique or sensitive habitats. During the survey, vegetation community types encountered will be described and field notes recorded as

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to dominant species, presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation habitat types. Unique habitats, or areas where sensitive species might occur, will be GPS-located. Where encountered, field teams will also identify wildlife species and their spoor (scat, tracks, scents, burrows, etc.).

The RTE species list provided in the PAD will be updated prior to the field survey and utilized as the foundation for visually searching for and identifying potentially suitable habitat for RTE species within the study area. Should RTE species be encountered, species/population information, habitat attributes, GPS location, and other relevant data will be recorded so that findings data can be transmitted to the appropriate agency and documented for the study report. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected will be shared only with the agencies having jurisdiction over the resource and will be filed as privileged (non-public) information.

Reporting

A Terrestrial and Wetland Resources Survey Report will be prepared and provided to stakeholders with the DLA for review and comment. The survey findings will be summarized in tables and figures. The study report will also provide a vegetation community map, including wetlands. The study results will be used in the DLA to analyze the effects of continued project operation and maintenance and project-related recreation on terrestrial and wetland resources and RTE species of plants and wildlife.

4.4 Schedule

The Terrestrial and Wetland Resources Survey will be completed according to the milestones in Table 4.

Table 4 Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline
Conduct field reconnaissance surveys	June-September 2022;
Conduct field reconnaissance surveys	April 2023
Prepare study report	August 2023
File study report with DLA for stakeholder review	Estimated February 2024

4.5 References

- Chafin, L.G. 2007. Field Guide to the rare plants of Georgia. State Botanical Garden of Georgia and University of Georgia Press, Athens.
- Edwards, L., J. Ambrose, and L. K. Kirkman. 2013. The natural communities of Georgia. Photographs by Hugh and Carol Nourse. The University of Georgia Press, Athens, Georgia.
- Georgia Department of Natural Resources (GDNR). 2013. Terrestrial Management Plan for Rocky Mountain Hydroelectric Plant and Recreation & Public Fishing Area. Spring 2013.
- Georgia Department of Natural Resources (GDNR). 2015. State Wildlife Action Plan. Wildlife Resources Division. Social Circle, Georgia.

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5.0 RECREATION USE ANALYSIS

OPC will conduct a study characterizing existing recreational use at the Rocky Mountain Project for evaluating the potential effects of continued project operation and maintenance on recreation resources in the license application. This study will be accomplished through the compilation and analysis of abundant existing recreational use information and field activities to inventory and describe existing facilities and survey recreation users at the Project.

5.1 Objectives

The specific objectives of this study are to:

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project.
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application.

5.2 Study Area

The study area includes the Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). The Rocky Mountain PFA contains Auxiliary Pool I (Antioch Lake East and West), Auxiliary Pool II (Heath Lake), and other recreation areas (e.g., hiking and biking trails) within the project boundary. Auxiliary Pools I and II are shown in Figure 1.

5.3 Methodology

A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified.

As recommended by GDNR, OPC will conduct on-site recreation surveys to collect data on public use characteristics and user satisfaction levels. Recreation users at the Project

June 2022 Project Control No. 0498003.01 will be surveyed on 15 days between June 2022 and May 2023¹. The purpose of these onsite surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities; annual recreation use will be estimated using GDNR traffic count data, as described below. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays), with an emphasis towards non-peak weekends, using the survey form developed in consultation with GDNR (Figure 4). A general schedule is provided in Table 5. A twoperson field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

Table 5 **General Survey Schedule**

Survey #	Month, Year	Day Type	Entrances
1	June 2022	Weekend	Main, Beach
2	July 2022	Holiday	Main, Beach, Heath
3	July 2022	Weekday	Main, Beach
4	August 2022	Weekend	Main, Beach, Heath
5	August 2022	Weekday	Main, Beach
6	September 2022	Weekend	Main, Beach, Heath
7	September 2022	Weekday	Main, Beach
8	October 2022	Weekend	Main, Beach, Heath
9	October 2022	Weekend	Main, Beach

¹ During discussions with GDNR on April 22, 2022, GDNR indicated they may be able to provide an intern to conduct additional surveys at the Rocky Mountain PFA. If GDNR is able to employ an intern to conduct surveys, the survey schedule will be revised.

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Project Control No. 0498003.01

Survey #	Month, Year	Day Type	Entrances
10	March 2023	Weekend	Main, Beach, Heath
11	March 2023	Weekday	Main, Beach
12	April 2023	Weekend	Main, Beach, Heath
13	April 2023	Weekend	Main, Beach
14	May 2023	Weekday	Main, Beach, Heath
15	May 2023	Weekend	Main, Beach

OPC's recreation survey methodology and level of effort are similar to those used by GDNR in a 2006-2007 recreation survey of the Rocky Mountain PFA, and they are consistent with generally accepted practice in relicensing recreation studies. As such, the recreation survey is expected to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the PFA facilities, and for comparison with the 2006-2007 survey results.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GDNR (Figure 5).

Current recreational use will be determined using existing data and information collected by GDNR, including attendance records, traffic count data, and staff observations; these sources of data were used to develop the 2015 Form 80 recreation report filed with FERC. It is OPC's understanding that GDNR continuously collects traffic count data using counter devices installed at the three Rocky Mountain PFA entrances. OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022 for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days." FERC defines a recreation day as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

Estimated projections of future recreation use at the Project will be developed using the average annual increase in population growth over the past 10 years for Floyd County, Georgia, as reported by the U.S. Census Bureau. The increase in population will be applied to the annual use estimates for the Project to determine a future recreation use estimate. This information will be considered when determining future recreation needs at the Project.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GDNR.

A Recreational Use Analysis Report will be prepared and provided to stakeholders with the DLA for review and comment. The study report will characterize existing recreation use and evaluate the need for recreational access or facility improvements.

5.4 Schedule

The Recreational Use Analysis will be completed according to the milestones in Table 6.

Table 6 Schedule for Recreational Use Analysis

Activity	Date or Deadline			
Conduct surveys	June-October 2022, March- May 2023			
Analyze data	June-July 2023			
Prepare study report	September 2023			
File study report with DLA for stakeholder review	Estimated February 2024			

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Mai	n Beach	_ Heath	Da	te:			Time:	1	
Interviewer:									
Vehicle Type: Vehicle w/ Trailer Vehicle w/o Trailer RV/Camper									
1. What is your county and state of residence? County: State:									
2. How many people	2. How many people are in your vehicle today? people								
3. What is your age?16-2425-3435-4445-5455+							55+		
4. If you came with others, what are their age groups? (check all that apply)									
Children (Infants-12) Youth (13-17) Adults (18-55) Senior Adults (over 55)									
5. How did you hear									
Friend/Relativ	e	Social M	edia						_Other
6. How many times	(including today), ha	ave you vis	sited I	Rocky Mt	n PFA	in the la	ast 30 c	lays?	
7. What is the prima	ry reason for your v	isit today	? (che	ck all tha	t appl	y)		,	
Boat Fishing	Picnicking		Hi	king		\	Can	oeing/kaya	aking
Bank Fishing	Swimming		Bil	king			Wild	dlife viewir	ng
Camping	Hunting	_	Ple	easure Bo	ating		Sho	reline rela	kation
Other:									
8. If you came to fis	h today, how would	you rate y	our fi	shing exp	erien	ice?			
Very Good (5)	Very Good (5)								
9. If you came to fis	h today, where did y	ou fish? (d	check	all that a	pply)				
Antioch Lake EastAntioch Lake West Heath Lake									
10. If you came to hunt today, how would you rate your hunting experience?									
Very Good (5)	Good (4)	Fair				or (2)			Poor (1)
11. Please rate the o		g facilities	at thi	is access a	area.	(choose	one fo	r each)	
Parking:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Boat Ramp:	Very Good (5)	Good		Fair	(3)	Poo	or (2)	Very	Poor (1)
Docks:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Restrooms:	Very Good (5)	Good	d (4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Beach:	Very Good (5)	Good	(4)	Fair	(3)	Poc	or (2)	Very	Poor (1)
Picnic Areas:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Campsites:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Trails:	Very Good (5)	Good	(4)	Fair	(3)	Pod	or (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Good		Fair	(3)	Poc	or (2)		Poor (1)
12. What type of visitation permit do you have? (check all that apply)									
Daily Daily Daily Daily									
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other									
comments or sugges	• •				,		,	,	•
11 11 38 5									

Figure 4 Recreation Survey Form

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:			Tin	ne:					
1. What is your county and state of residence?			County:			State:			
2. How many people are staying in your campsite tonight? people									
3. What is your age	.?	_18-24		_25-34	3	35-44		45-54	55+
4. If you came with	4. If you came with others, what are their age groups? (check all that apply)								
Children (Infar		h (13-17)		Adults (1				or Adults	(over 55)
5. How would you				e for camp			ons?		
Very Good (5)	Good (4)	Fair	<u> </u>	Poor (2)Very Poor (1)					
6. What activities a		g in while c	amp		k all th	at app			
Boat Fishing	Picnicking			_Hiking				Canoeing/	
Bank Fishing	Swimming			_Biking			Wildlife Viewing		
Hunting	Pleasure Boat	ing		_Shoreline	relaxat	ion	Other (list below):		below):
7. While camping a		PFA, are yo	u sta						
TentRVTent/RV ComboGroup Camp					mp				
8. If you came to fish today, how would you rate your fishing experience?									
Very Good (5) Good (4) Fair (3) Poor (2) Very Poor (1)									
9. If you came to hunt today, how would you rate your hunting experience?									
Very Good (5) Good (4)Fair (3)Poor (2)Very Poor (1)					` '				
10. Please rate the				_					
Campsite:	Very Good (5)	Good	•	Fair (3		_Poo			Poor (1)
Playground:	Very Good (5)	Good	•	Fair (3		_Poo			Poor (1)
Restrooms:	Very Good (5)	Good	• •	Fair (3		_Poo	• •		Poor (1)
Cleanliness:	Very Good (5)	Good	` '	Fair (3		_Poo			Poor (1)
Bank Fishing:	Very Good (5)	Good	` ,	Fair (3	<i>'</i>	_Poo	r (2)	Very	Poor (1)
11. What type of vi		you have? (che		• • • •	ı			
DailyAnnualCampgroundNone									
12. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and									
any other comments or suggestions.									

Figure 5 Campground User Survey Form



Meeting Summary Rocky Mountain Relicensing Studies

Date and Time: Thursday, June 16, 2022, 10:00-11:00 am

Location: Virtual Meeting (Webex)

Participants:

Jim Hakala, Georgia Department of Natural Resources (GDNR)
Paula Marcinek, GDNR
Clint Peacock, GDNR
Craig Jones, Oglethorpe Power Corporation (OPC)
Tyler McCaslin, OPC
Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

The purpose of the meeting was to provide an overview of OPC's proposed methodology for the Recreation Use Analysis, Water Quality Assessment, Aquatic Resources, and Terrestrial and Wetland Resources Survey studies. OPC described how agency comments were considered and addressed in the study plans and the timing of the field surveys. GDNR will also be seeking internal review and sharing any review comments on wildlife and botany.

From: Marcinek, Paula
To: McCaslin, Tyler

Cc: Peacock, Clint; Jones, Craig; Steven Layman; Kelly Kirven

Subject: RE: Rocky Mountain Relicensing - Terrestrial Management Plan

Date: Thursday, June 16, 2022 11:17:41 AM

Attachments: <u>image001.pnq</u>

External E-Mail

Thank you!

-Paula

From: McCaslin, Tyler <tyler.mccaslin@opc.com>

Sent: Thursday, June 16, 2022 11:09 AM

To: Marcinek, Paula <Paula.Marcinek@dnr.ga.gov>

Cc: Peacock, Clint <Clint.Peacock@dnr.ga.gov>; Jones, Craig <craig.jones@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

Subject: Rocky Mountain Relicensing - Terrestrial Management Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hey Paula,

As requested during our meeting, I have attached the Terrestrial Management Plan from 2013.

Please let me know if you have any questions or need additional information. We are looking forward to seeing you next week if your schedule permits!

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7723 Mobile: 404-576-9097 Email: tyler.mccaslin@opc.com Web: www.opc.com



MARK WILLIAMS COMMISSIONER

TED WILL DIRECTOR

June 22, 2022

Mr. Craig Jones Oglethorpe Power Corporation 2100 East Exchange Place Tucker, GA 30084

Mr. Jones,

This letter is in regard to your April 22, 2022 request for DNR-WRD to provide a list of needed facility repairs and improvements at Rocky Mountain Recreation and Public Fishing Area (RMRPFA). As requested, we have developed the following list of facility repairs and improvements at RMRPFA for Oglethorpe Power Corporation consideration. We greatly appreciate this opportunity to continue to provide a high quality outdoor recreational opportunity for our constituents.

Septic and Sanitation

- Replace Pit Privies with ADA compliant CXT Buildings at PFA's three boat ramps and Group Camp.
 - We receive frequent visitor complaints regarding condition and inherent odor of existing pit privies. While CXT buildings are pit-style toilets requiring pump-out, they provide improved ventilation, updated interiors, and are easier to clean. The pit privy at the Group Camp should be replaced with a two-sided CXT building with a shower and toilet on each side. This would require electrical work and installation of sewage pump and sewer lines to the dump station.
- Renovate campground and beach sewage lift system and install back-up generator system
 to keep sewage lift pumps operational during power outages, which typically occur
 several times annually.
- Replace aging septic tank system at campground host site with sewage lift system. This would save approximately \$3,000 in pumping costs per year.
- Upgrade the Beach Bathroom to have shower stalls on both sides.

 This would alleviate the issue of non-campers coming into the campground and using (and often misusing) the shower facility intended for registered campers only.
- Replace/rebuild wet well lids on all septic pump pits in the Campground, Beach, Point, and Visitor Center buildings. Priority should be considered at the Beach, where a sewage spill could shut the swimming area down for an extended period.

Communications

Improve internet and cellular coverage, especially at the campground.
 This would address safety/operational concerns associated with unreliable internet and cellular service area-wide and support reliable onsite access to the online campground reservation system.

Office and Shop

• Replace or renovate aging office and shop building. WRD/LED have outgrown the current building's capacity.

ADA Compliant Fishing/Boating Access

- Create or adapt existing access to improve ADA-compliant accessible fishing areas at East and West Antioch, and Heath Lakes.
- Addition of one ADA-compliant kayak dock at a suitable location.

Improved Kayak Access

- Create paved access, parking, and kayak loading area at Heath Lake Archery Range to alleviate crowding/safety concerns at the Heath Lake Boat Ramp. Given the rise in popularity of kayak fishing in recent years, the existing boat ramp is often bottlenecked by those hand-launching kayaks among traditional boat and trailer users. Consider relocating current Archery Range to nearby area.
- Install a kayak dock at the West Antioch "roadbed", which is currently being used as an informal public kayak launch.

General Facilities and Infrastructure

- Renovate Visitor Center bathroom for year-round use.

 Installing a drop ceiling, sealing eave vents, and panel heaters would turn it into a year-round amenity and eliminate the need for winterization/closure.
- Update the interiors of flush bathrooms at the Visitor Center, Point, Beach, and Campground.
- Replace all campsite railings. WRD can handle installation, with addition of lumber expense to a future budget.
- Install two, 20/30/50-amp electrical hookups in Group Camp parking lot. Some users are currently using campers at the site. This would be an added amenity and consideration could be given to adjusting rental cost accordingly.
- Replace roof on aging equipment storage pole barns across from WRD office.
- Re-grade drainage ditches in campground.
- Replace aging manual gates at all three boat ramp entrances with automatic, programmable gates similar to the existing campground gate.
- All roads should be evaluated for resurfacing and shoulder repair.
- Address any lake shore erosion problems.

Sincerely,

Jackson Sibley Fisheries Biologist

Cc: Jim Hakala, Region Fisheries Supervisor Dennis Shiley, RMRPFA Manager From: <u>Jones, Craig</u>

To: <u>Hakala, Jim; Paula.Marcinek@dnr.ga.gov</u>

Cc: Sibley, Jackson; Peacock, Clint; McCaslin, Tyler; Steven Layman; Kelly Kirven

Subject: Terrestrial/Wetland and Fish Studies **Date:** Monday, June 27, 2022 5:56:23 PM

Attachments: <u>image001.pnq</u>

Hi Jim and Paula,

I hope all is well. I'm am following up on our last discussion on the timing and methods of the fish and terrestrial/wetland studies. Please let me some good dates and times over the next two weeks to discuss.

We are targeting the week of July 11 to begin the terrestrial and wetland studies and the last week of July to begin the fish study.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



 From:
 Jones, Craig

 To:
 ER

Cc: Steven Layman; McCaslin, Tyler; Ayesha Tarek

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Date:Thursday, July 7, 2022 4:15:00 PMAttachments:image003.png

image003.png image001.png

Hi Santi,

Thanks for the quick response. Essentially, we want to make sure that you all are on board with the approach and schedule. We'll also need to consult with you on the APE and hope to have that wrapped up this month. We're also happy to bring Ayesha up to speed as needed on information we've already provided in the pre-application document (PAD).

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: ER [mailto:er@dca.ga.gov]
Sent: Thursday, July 7, 2022 4:04 PM
To: Jones, Craig <craig.jones@opc.com>

Cc: Steven Layman <Steven.Layman@Kleinschmidtgroup.com>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Ayesha Tarek

<Ayesha.Tarek@dca.ga.gov>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Good afternoon, I am replying to confirm that the draft study plan has been received and entered into the queue for review.

Regarding the meeting, I am still the contact on the architectural history side of things, however, Ayesha Tarek (cc'ed on this email) is now the point of contact for archaeology considerations. Please let us know what you have in mind for the meeting and we will go from there.

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.ga.gov

? ? ? ? ?

From: Jones, Craig <craig.jones@opc.com>
Sent: Thursday, July 7, 2022 3:15 PM

To: ER < er@dca.ga.gov>

Cc: Jennifer Dixon < Jennifer.Dixon@dca.ga.gov>; Santiago D. Martinez < Santiago.Martinez@dca.ga.gov>; Steven Layman

 $<\!\underline{Steven.Layman@Kleinschmidtgroup.com}\!\!>; McCaslin, Tyler<\!\underline{tyler.mccaslin@opc.com}\!\!>$

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

Oglethorpe Power is preparing to conduct an upcoming cultural resources study for the Rocky Mountain Pumped Storage relicensing process. We would like to meet to discuss the attached draft study plan.

We have previously spoken with Aspen Kemmerlin and Santiago Martinez about our relicensing efforts. However, we understand that Aspen is no longer with HPD (see email string below). Please advise who we should contact to schedule a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig

Sent: Thursday, July 7, 2022 3:07 PM

To: 'Jennifer Dixon' <<u>Jennifer.Dixon@dca.ga.gov</u>>; Aspen Kemmerlin <<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler < <u>tyler.mccaslin@opc.com</u>>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Jennifer,

Thanks for the alert. I'll forward the communication to that address.

Best,

cj

From: Jennifer Dixon [mailto:Jennifer.Dixon@dca.ga.gov]

Sent: Thursday, July 7, 2022 3:04 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Aspen Kemmerlin <<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Aspen no longer works with HPD, and if you could, any submittals should be sent to er@dca.ga.gov – that way it will get to whoever has taken over for Aspen.

Thanks!

Jennifer Dixon

Division Director, Historic Preservation Division Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329

Direct 4044866376

Jennifer.Dixon@dca.ga.gov

Learn more about our commitment to fair housing.

From: Jones, Craig <<u>craig.jones@opc.com</u>>
Sent: Thursday, July 7, 2022 2:57 PM

To: Aspen Kemmerlin < <u>Aspen.Kemmerlin@dca.ga.gov</u>>

 $\textbf{Cc:} \ Santiago \ D. \ Martinez \\ \times \underline{Santiago.Martinez@dca.ga.gov}; \ McCaslin, \ Tyler \\ \times \underline{tyler.mccaslin@opc.com}; \ Jennifer \ Dixon \\ \times \underline{Santiago.Martinez@dca.ga.gov}; \ McCaslin, \ Tyler \\ \times \underline{Santiago.Martinez@dca.ga.gov}; \ McCaslin, \ McCa$

<<u>Jennifer.Dixon@dca.ga.gov</u>>; Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

I hope your summer is going well. We are preparing our upcoming cultural resources study and would like to meet with you to discuss the methods and schedule. I've attached a draft study plan for your review. Do you have some time next week to meet to discuss? If next week works well, let me know some dates and times and I'll work with our folks to coordinate a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: <u>Jennifer Dixon</u>; <u>Aspen Kemmerlin</u>

Cc: Santiago D. Martinez; McCaslin, Tyler; Steven Layman

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Date: Thursday, July 7, 2022 3:07:12 PM

Attachments: <u>image001.pnq</u>

Hi Jennifer,

Thanks for the alert. I'll forward the communication to that address.

Best.

cj

From: Jennifer Dixon [mailto:Jennifer.Dixon@dca.ga.gov]

Sent: Thursday, July 7, 2022 3:04 PM

To: Jones, Craig <craig.jones@opc.com>; Aspen Kemmerlin <Aspen.Kemmerlin@dca.ga.gov>

Cc: Santiago D. Martinez <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler

<tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>

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Craig,

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Thanks!



Learn more about our commitment to fair housing.



Jennifer Dixon

Division Director, Historic Preservation Division Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329

Direct <u>4044866376</u> <u>Jennifer.Dixon@dca.ga.gov</u>

From: Jones, Craig < com>

Sent: Thursday, July 7, 2022 2:57 PM

To: Aspen Kemmerlin < Aspen. Kemmerlin@dca.ga.gov>

Cc: Santiago D. Martinez < Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Jennifer Dixon <Jennifer.Dixon@dca.ga.gov>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

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Craig

Craig A. Jones, PhD

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Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>
To: <u>Aspen Kemmerlin</u>

Cc: Santiago D. Martinez; McCaslin, Tyler; Jennifer Dixon; Steven Layman

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Date: Thursday, July 7, 2022 2:57:01 PM

Attachments: <u>image001.png</u>

0498003 Rocky Mountain Proposed Study Plans 07-07-2022 HPD.pdf

Good Afternoon Aspen,

I hope your summer is going well. We are preparing our upcoming cultural resources study and would like to meet with you to discuss the methods and schedule. I've attached a draft study plan for your review. Do you have some time next week to meet to discuss? If next week works well, let me know some dates and times and I'll work with our folks to coordinate a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com







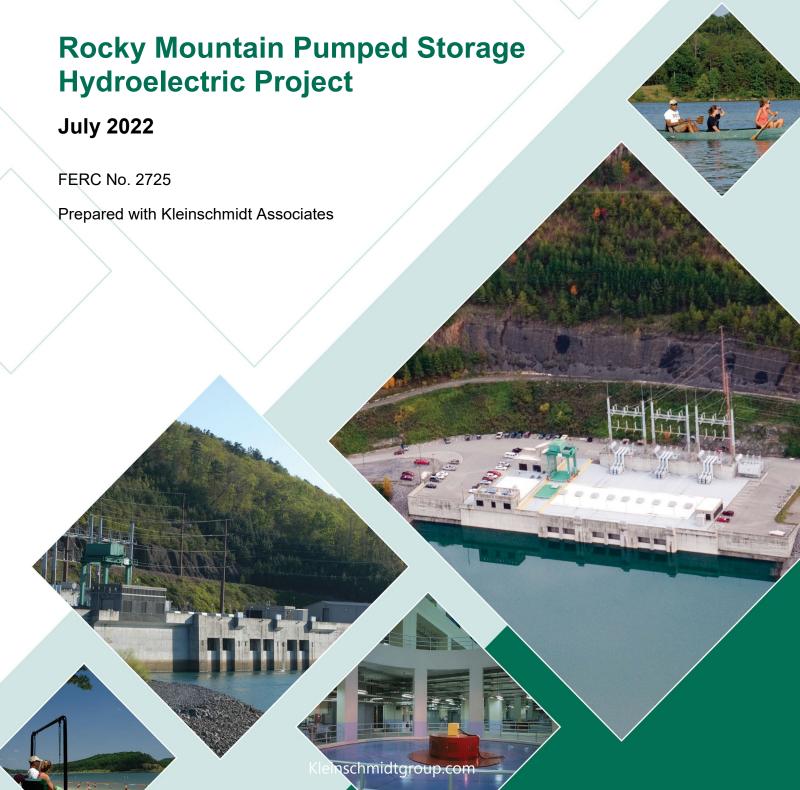


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1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

June 2022 Project Control No. 0498003.01

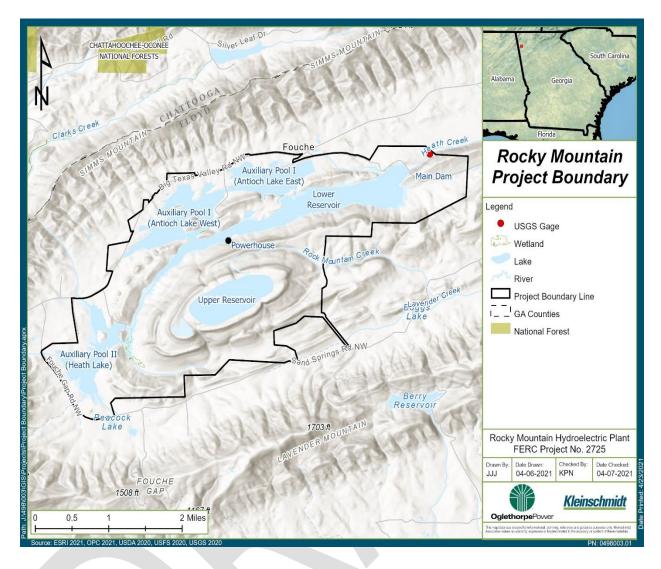


Figure 1 Project Boundary Map



2.0 CULTURAL RESOURCES ASSESSMENT

OPC proposes to conduct a cultural resources assessment of the Rocky Mountain Project to identify and evaluate archaeological and historical resources within the Area of Potential Effect (APE). The study will consist of review of available information on known archaeological and historical sites in the project boundary, including previous extensive cultural resource assessments summarized in the PAD; an archaeological field survey to update/refine site boundaries and to determine the National Register of Historic Places (NRHP) eligibility status of one site, and an architectural field survey to evaluate the NRHP eligibility of project facilities.

2.1 Objectives

The goal of this study is to identify and document historic properties located within the APE that could be affected by continued operation and maintenance of the Project. This information will be used to modify the Project's existing Cultural Resources Management Plan (CRMP) into a new Historic Properties Management Plan (HPMP)

The specific objectives of this study are to:

- Identify and summarize known historic properties at the Project within the APE.
- Conduct an archaeological field survey for a site (GP-FL-14/CRFL 14) specified in the 2020 Cultural Resources Monitoring Report (TRC) provided in the PAD to define the site boundaries and determine its NRHP eligibility status.
- Conduct an architectural field survey to evaluate the NRHP eligibility status of project facilities, which will turn 50 years of age during the new license term.
- Evaluate the potential for effects on historic resources from continued project operation and maintenance and project-related recreation.

2.2 Study Area

The study area will be the APE, to be identified and delineated in consultation with the Georgia Department of Community Affairs Historic Preservation Division (GHPD) and FERC. The APE is expected to include the FERC project boundary, encompassing the project facilities, Rocky Mountain PFA, and 5,000 acres of land and water.

July 2022 2-1

2.3 Methodology

OPC will contract the services of a professional cultural resources consultant who will use currently accepted practices as defined under Section 106 of the Historic Preservation Act of 1966 (as amended) and implementing regulations (36 CFR 800) for the identification and evaluation of historic properties.

Agency Consultation

OPC will consult with GHPD and FERC to define the project APE and to address overall study goals and methods. OPC will prepare map(s) showing the APE in relation to the project boundary and document GHPD and FERC concurrence with the APE.

Background Literature Research

An archaeological site file and literature review will be conducted at the research and collections facility of the University of Georgia and at Georgia's Archaeological Site File records maintained online on the Georgia Natural, Archaeological, and Historic Geographic Information System (GNAHRGIS). The review will include the *Revised Cultural Resources Management Plan for the Rocky Mountain Project, Floyd County, Georgia* (Garrow and Cleveland 1997), which provides a synthesis of the previous extensive cultural resource assessments completed at the Project and summarized in the PAD, the findings of archaeological monitoring conducted at the Project in 2020 (Appendix F of the PAD, privileged information), and existing reports and documents available from OPC.

Architectural research will also include historical research on the Rocky Mountain Project that places it in the context of large-scale hydroelectric power generation, water control features, and recreation in Georgia and the Southeast United States. Material collected will include secondary histories, primary sources, historic maps, photographs, drawings, and reports related to the planning and construction of the Project, as well as documents related to operation of the facility and management of the resources within the APE. The historical context will be illustrated, fully referenced, and used to evaluate the Project's eligibility for listing in the NRHP.

July 2022 Project Control No. 0498003.01

Archaeological Survey

In November 2020, TRC Environmental Corporation (TRC) conducted archaeological monitoring of six sites previously recommended for preservation and monitoring, with the goal of locating and visually assessing the condition of each site. All six sites were located and shown to be well maintained and protected, with no evidence of looting, natural destruction, erosion caused by project operations, or vandalism. However, based on observations from the monitoring, OPC proposes the following additional archaeological field survey activities:

- Site 9FL80 (Fouche Mill Property) relocate the site boundaries and update the official site form and boundary in the GNAHRGIS database. No additional shovel testing will be conducted at the site.
- Site 9FL138 (Fisher House) refine the site boundaries by conducting a cruciform pattern of shovel tests excavated at 15-meter (m) intervals. Based on the results of the shovel testing and the aboveground features observed at the site during 2020 monitoring, a new boundary and updated site form will be recorded.
- Site 9FL148 (Fouche/Hardy Farm) based on observation of additional structural debris outside the original site boundary, refine and update the site boundaries by conducting a systematic pedestrian survey along transects spaced no more than 15 m apart. The new site boundary will be recorded via GPS and updated site form will be recorded and submitted to GHPD.

Architectural Survey

A site visit and survey will be conducted of previously identified architectural resources aged 50 years or older in the APE. The project facilities will be photo-documented, including the Upper Reservoir, Lower Reservoir, Auxiliary Pools, powerhouse, dams, penstocks, substation, and transmission lines. Recreational facilities at the Auxiliary Pools will also be documented. Views will be taken inside (when possible) and outside all buildings and engineering structures in order to document current conditions and to illustrate the Project's historic features for the purposes of assessing its potential significance. A plan map of the facility will be prepared showing the relationship of the different components to one another.

Reporting

A Cultural Resources Assessment Report will be prepared and provided to participants with the DLA for review and comment. The study report will identify and document the historic properties located within the APE that could be affected by continued operation and maintenance of the Project.

2.4 Schedule

The Cultural Resources Assessment will be completed according to the milestones in Table 7.

Table 1 Schedule for Cultural Resources Assessment

Activity	Date or Deadline		
Identify APE	July 2022		
Conduct literature review	July-August 2022		
Conduct field survey	August-October 2022		
Conduct archaeological survey	August-October 2022		
Prepare study report	March 2023		
File study report with DLA for stakeholder review	Estimated February 2024		

From: Jones, Craig
To: Bauer, Eric F

Cc: <u>McCaslin, Tyler; Steven Layman</u>

Subject: Rocky Mountain Relicensing Proposed Studies

Date: Thursday, July 7, 2022 6:45:54 PM

Attachments: <u>image003.png</u>

Good Afternoon Eric,

I hope your summer is going well. I'm reaching out to see if we can schedule some time next week to discuss USFWS's comments on the proposed studies, in particular with respect to water quality monitoring. If next week works for you, please let me know when you have some availability, and I'd be happy to coordinate a meeting.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: ER

Cc: <u>Steven Layman</u>; <u>McCaslin, Tyler</u>; <u>Ayesha Tarek</u>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Date: Friday, July 8, 2022 2:05:01 PM

Santi and Ayesha,

Thanks again for the quick response on dates/times. Let's plan on Monday at 2:00. I'll send a Webex invite soon. Let me know if that doesn't work, and I'll adjust.

Best,

cj

From: Jones, Craig

Sent: Friday, July 8, 2022 9:01 AM

To: ER <er@dca.ga.gov>

Cc: Steven Layman <Steven.Layman@kleinschmidtgroup.com>; McCaslin, Tyler

<tyler.mccaslin@opc.com>; Ayesha Tarek <Ayesha.Tarek@dca.ga.gov>

Subject: Re: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Great. Thanks, Santi. I'll get back to you later today on a time. Best, cj

Sent from my iPad. Please pardon the typsos.

On Jul 8, 2022, at 8:57 AM, ER < <u>er@dca.ga.gov</u>> wrote:

External E-Mail

Craig,

Good morning, sounds good. Ayesha and I are available on Monday, Tuesday, and Wednesday of next week, although I have another meeting at 9 am on Tuesday.

Please let us know what works best for you and we can go from there.

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.ga.gov



From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, July 7, 2022 4:15 PM

To: ER < er@dca.ga.gov>

Cc: Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tyler.mccaslin@opc.com>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Santi,

Thanks for the quick response. Essentially, we want to make sure that you all are on board with the approach and schedule. We'll also need to consult with you on the APE and hope to have that wrapped up this month. We're also happy to bring Ayesha up to speed as needed on information we've already provided in the pre-application document (PAD).

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image001.png>

From: ER [mailto:er@dca.ga.gov]
Sent: Thursday, July 7, 2022 4:04 PM
To: Jones, Craig <craig.jones@opc.com>

Cc: Steven Layman < Steven.Layman@Kleinschmidtgroup.com >; McCaslin, Tyler

<<u>tyler.mccaslin@opc.com</u>>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Good afternoon, I am replying to confirm that the draft study plan has been received and entered into the queue for review.

Regarding the meeting, I am still the contact on the architectural history side of things, however, Ayesha Tarek (cc'ed on this email) is now the point of contact for archaeology considerations. Please let us know what you have in mind for the meeting and we will go from there.

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>

Sent: Thursday, July 7, 2022 3:15 PM **To:** ER <er@dca.ga.gov>

Cc: Jennifer Dixon < <u>Jennifer.Dixon@dca.ga.gov</u>>; Santiago D. Martinez

<Santiago.Martinez@dca.ga.gov>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>;

McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

Oglethorpe Power is preparing to conduct an upcoming cultural resources study for the Rocky Mountain Pumped Storage relicensing process. We would like to meet to discuss the attached draft study plan.

We have previously spoken with Aspen Kemmerlin and Santiago Martinez about our relicensing efforts. However, we understand that Aspen is no longer with HPD (see email string below). Please advise who we should contact to schedule a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image002.png>

From: Jones, Craig

Sent: Thursday, July 7, 2022 3:07 PM

To: 'Jennifer Dixon' < <u>Jennifer.Dixon@dca.ga.gov</u>>; Aspen Kemmerlin

<<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Jennifer,

Thanks for the alert. I'll forward the communication to that address.

Best,

Сj

From: Jennifer Dixon [mailto:Jennifer.Dixon@dca.ga.gov]

Sent: Thursday, July 7, 2022 3:04 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Aspen Kemmerlin <<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Aspen no longer works with HPD, and if you could, any submittals should be sent to <u>er@dca.ga.gov</u> – that way it will get to whoever has taken over for Aspen.

Thanks!

Learn more about our commitment to fair housing.

Jennifer Dixon

Division Director, Historic Preservation Division Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329

Direct 4044866376

Jennifer.Dixon@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, July 7, 2022 2:57 PM

To: Aspen Kemmerlin < Aspen. Kemmerlin@dca.ga.gov >

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler < <u>tyler.mccaslin@opc.com</u>>; Jennifer Dixon < <u>Jennifer.Dixon@dca.ga.gov</u>>; Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

I hope your summer is going well. We are preparing our upcoming cultural resources study and would like to meet with you to discuss the methods and schedule. I've attached a draft study plan for your review. Do you have some time next week to meet to discuss? If next week works well, let me know some dates and times and I'll work with our folks to coordinate a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image002.png>

From: Jones, Craig
To: Sibley, Jackson

Cc: Shiley, Dennis; Hakala, Jim; McCaslin, Tyler

Subject: RE: RMPFA Repair and Improvements

Date: Friday, July 8, 2022 1:53:51 PM

Attachments: <u>image002.png</u>

Hi Jackson,

Thanks for sending the list. This is very helpful at this stage in the process, so thanks again for the effort in putting it together.

I look forward to discussing in more detail as we move through the process.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Sibley, Jackson [mailto:Jackson.Sibley@dnr.ga.gov]

Sent: Thursday, June 23, 2022 4:29 PM **To:** Jones, Craig <craig.jones@opc.com>

Cc: Shiley, Dennis <dennis.shiley@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Subject: RMPFA Repair and Improvements

External E-Mail

Craig,

Please find the attached letter in response to OPC's April request for a list of needed repairs and improvements at RMPFA. We are happy to discuss these in greater detail, please feel free to reach out.

Thanks,

Jackson Sibley

Fisheries Biologist II (706) 844-3676

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MARK WILLIAMS COMMISSIONER

TED WILL DIRECTOR

June 22, 2022

Mr. Craig Jones Oglethorpe Power Corporation 2100 East Exchange Place Tucker, GA 30084

Mr. Jones,

This letter is in regard to your April 22, 2022 request for DNR-WRD to provide a list of needed facility repairs and improvements at Rocky Mountain Recreation and Public Fishing Area (RMRPFA). As requested, we have developed the following list of facility repairs and improvements at RMRPFA for Oglethorpe Power Corporation consideration. We greatly appreciate this opportunity to continue to provide a high quality outdoor recreational opportunity for our constituents.

Septic and Sanitation

- Replace Pit Privies with ADA compliant CXT Buildings at PFA's three boat ramps and Group Camp.
 - We receive frequent visitor complaints regarding condition and inherent odor of existing pit privies. While CXT buildings are pit-style toilets requiring pump-out, they provide improved ventilation, updated interiors, and are easier to clean. The pit privy at the Group Camp should be replaced with a two-sided CXT building with a shower and toilet on each side. This would require electrical work and installation of sewage pump and sewer lines to the dump station.
- Renovate campground and beach sewage lift system and install back-up generator system
 to keep sewage lift pumps operational during power outages, which typically occur
 several times annually.
- Replace aging septic tank system at campground host site with sewage lift system. This would save approximately \$3,000 in pumping costs per year.
- Upgrade the Beach Bathroom to have shower stalls on both sides.

 This would alleviate the issue of non-campers coming into the campground and using (and often misusing) the shower facility intended for registered campers only.
- Replace/rebuild wet well lids on all septic pump pits in the Campground, Beach, Point, and Visitor Center buildings. Priority should be considered at the Beach, where a sewage spill could shut the swimming area down for an extended period.

Communications

Improve internet and cellular coverage, especially at the campground.
 This would address safety/operational concerns associated with unreliable internet and cellular service area-wide and support reliable onsite access to the online campground reservation system.

Office and Shop

• Replace or renovate aging office and shop building. WRD/LED have outgrown the current building's capacity.

ADA Compliant Fishing/Boating Access

- Create or adapt existing access to improve ADA-compliant accessible fishing areas at East and West Antioch, and Heath Lakes.
- Addition of one ADA-compliant kayak dock at a suitable location.

Improved Kayak Access

- Create paved access, parking, and kayak loading area at Heath Lake Archery Range to alleviate crowding/safety concerns at the Heath Lake Boat Ramp. Given the rise in popularity of kayak fishing in recent years, the existing boat ramp is often bottlenecked by those hand-launching kayaks among traditional boat and trailer users. Consider relocating current Archery Range to nearby area.
- Install a kayak dock at the West Antioch "roadbed", which is currently being used as an informal public kayak launch.

General Facilities and Infrastructure

- Renovate Visitor Center bathroom for year-round use.

 Installing a drop ceiling, sealing eave vents, and panel heaters would turn it into a year-round amenity and eliminate the need for winterization/closure.
- Update the interiors of flush bathrooms at the Visitor Center, Point, Beach, and Campground.
- Replace all campsite railings. WRD can handle installation, with addition of lumber expense to a future budget.
- Install two, 20/30/50-amp electrical hookups in Group Camp parking lot. Some users are currently using campers at the site. This would be an added amenity and consideration could be given to adjusting rental cost accordingly.
- Replace roof on aging equipment storage pole barns across from WRD office.
- Re-grade drainage ditches in campground.
- Replace aging manual gates at all three boat ramp entrances with automatic, programmable gates similar to the existing campground gate.
- All roads should be evaluated for resurfacing and shoulder repair.
- Address any lake shore erosion problems.

Sincerely,

Jackson Sibley Fisheries Biologist

Cc: Jim Hakala, Region Fisheries Supervisor Dennis Shiley, RMRPFA Manager From: <u>Marcinek, Paula</u>

To: <u>Jones, Craig; Hakala, Jim</u>

Cc: Sibley, Jackson; Peacock, Clint; McCaslin, Tyler; Steven Layman; Kelly Kirven

Subject: RE: Terrestrial/Wetland and Fish Studies

Date: Sunday, July 10, 2022 8:25:05 PM

Attachments: image001.png

image002.png

External E-Mail

10-4. I forwarded the new timeline. Hopefully we'll hear back this week.

Paula Marcinek

Aquatic Biologist, Wildlife Conservation

Wildlife Resources Division

M: (404) 323-7751

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From: Jones, Craig <craig.jones@opc.com>

Sent: Friday, July 8, 2022 2:24 PM

To: Marcinek, Paula <Paula.Marcinek@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Cc: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; Peacock, Clint <Clint.Peacock@dnr.ga.gov>;

McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

Subject: RE: Terrestrial/Wetland and Fish Studies

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Paula, I provided the wrong week for the terrestrial and wetland study; it actually will take place the week of July 25, so a little more time for the Botany Team to respond. Best regards, Craig

From: Jones, Craig

Sent: Friday, July 8, 2022 1:59 PM

To: 'Marcinek, Paula' <<u>Paula.Marcinek@dnr.ga.gov</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Cc: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>; Peacock, Clint < <u>Clint.Peacock@dnr.ga.gov</u>>;

McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

Subject: RE: Terrestrial/Wetland and Fish Studies

Hi Paula,

Thank you for the update. We are moving the first segment of the terrestrial and wetland study to the week of July 18, so we have a little more time to get something from the Botany Team. It would be great to have their feedback sometime next week.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Tuesday, June 28, 2022 10:57 AM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Cc: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>; Peacock, Clint < <u>Clint.Peacock@dnr.ga.gov</u>>;

McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: RE: Terrestrial/Wetland and Fish Studies

External E-Mail

Good morning.

I have asked the WCS Botany Team and the local Coosa Aquatic Biologist to review the proposed studies and provide feedback. We should have the mussel and fish feedback by 7/15 and can schedule a meeting and/or site visit for later in the month.

I bumped the Botany Team, so hopefully we will hear back from them soon.

Paula Marcinek

Aquatic Biologist, Wildlife Conservation

Wildlife Resources Division

M: (404) 323-7751

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From: Jones, Craig < craig.jones@opc.com>
Sent: Monday, June 27, 2022 5:56 PM

To: Hakala, Jim Jim.Hakala@dnr.ga.gov; Marcinek, Paula Paula Paula Paula Paula <a href="Paula.Marcinek@dnr.gov"

Cc: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; Peacock, Clint <Clint.Peacock@dnr.ga.gov>; McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>; Steven Layman <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>; Kelly Kirven <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: Terrestrial/Wetland and Fish Studies

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jim and Paula,

I hope all is well. I'm am following up on our last discussion on the timing and methods of the fish and terrestrial/wetland studies. Please let me some good dates and times over the next two weeks to discuss.

We are targeting the week of July 11 to begin the terrestrial and wetland studies and the last week of July to begin the fish study.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



Meeting Summary Draft Cultural Resources Study for Rocky Mountain Relicensing

Date and Time: Monday, July 11, 2022, 2:00-3:00 pm

Location: Virtual Meeting (Webex)

Participants:

Santiago Martinez, Georgia Department of Community Affairs – Historic Preservation Division (GHPD)

Ayesha Tarek, GHPD

Craig Jones, Oglethorpe Power Corporation (OPC)

Tyler McCaslin, OPC

Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the proposed study plan and methodology for the Cultural Resource Assessment studies (archaeological and architectural) for relicensing of the Rocky Mountain Project. TRC will be conducting the surveys for OPC. GHPD referred OPC/TRC to the current Georgia standards relative to shovel testing patterns and establishing site boundaries.

From: Jones, Craig
To: Bauer, Eric F

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: RE: Rocky Mountain Relicensing Proposed Studies

Date: Tuesday, July 12, 2022 5:32:30 PM

Attachments: <u>image001.png</u>

Hi Eric,

I'm just following up on the email below from last week. Let me know if there's a good time for you to connect this week or next week.

Best,

cj

From: Jones, Craig

Sent: Thursday, July 7, 2022 6:46 PM **To:** 'Bauer, Eric F' <eric_bauer@fws.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Rocky Mountain Relicensing Proposed Studies

Good Afternoon Eric,

I hope your summer is going well. I'm reaching out to see if we can schedule some time next week to discuss USFWS's comments on the proposed studies, in particular with respect to water quality monitoring. If next week works for you, please let me know when you have some availability, and I'd be happy to coordinate a meeting.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig
To: Clark, Maria

 Cc:
 McCaslin, Tyler; Steven Layman

 Subject:
 Rocky Mountain Relicensing Studies

 Date:
 Tuesday, July 12, 2022 6:25:25 PM

Attachments: <u>image001.png</u>

Good Evening Maria,

I hope your summer is going well. I'm reaching out to see if we can schedule some time this week or next to discuss the relicensing water quality study. Primarily we want to give you an update on our progress and answer any questions you may have.

Please let me know if there are some dates this week or next that work well for you, and I'll be happy to coordinate a meeting.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



Telephone Conversation Record

Date and Time: Tuesday, July 12, 2022, 2:30-2:45 p.m.

Subject: Fisheries sampling locations along Heath Creek

Participants: Paula Marcinek, Georgia Department of Natural Resources (GDNR)

Will Pruitt, Kleinschmidt Associates

Prepared by: Will Pruitt

Call Summary

The purpose of the call was to determine the location of GDNR's 2001 and 2002 fisheries IBI sampling locations on Health Creek at Texas Valley Road and determine preferred sampling locations for the upcoming 2022 IBI surveys for the Rocky Mountain PS field studies.

Paula referred the notes collected during the 2001 and 2002 fish surveys, which showed that the GDNR's IBI assessments in Heath Creek were conducted ~75 meters upstream of Texas Valley Road. Her preference is that the upcoming surveys take place in the same general location to provide a direct comparison of IBI scores to the previous studies. Although conditions may have changed since then, the preferred area for the new studies is upstream.

GDNR biologist Ani Escobar may choose to be on-site during stream reconnaissance to discuss sampling and habitat conditions.

From: Jones, Craig
To: Bauer, Eric F

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: RE: [EXTERNAL] RE: Rocky Mountain Relicensing Proposed Studies

Date: Wednesday, July 13, 2022 11:39:49 AM

Attachments: <u>image003.pnq</u>

image004.png

Eric,

No worries at all. I'll send an invite for next Wednesday at 2:00. Looking forward to the discussion.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Bauer, Eric F [mailto:eric_bauer@fws.gov]

Sent: Wednesday, July 13, 2022 8:12 AM **To:** Jones, Craig <craig.jones@opc.com>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Re: [EXTERNAL] RE: Rocky Mountain Relicensing Proposed Studies

External E-Mail

Good morning Craig,

My apologies, I thought I responded to your previous email. I'm pretty swamped this week but I'm free pretty much any time next week other than 11-12 on Monday and Tuesday.

-Eric

Eric F. Bauer, PhD
(he/him)
Fish and Wildlife Biologist
Georgia Ecological Services

US Fish and Wildlife Service

RG Stephens, Jr. Federal Building

355 East Hancock Avenue, Room 320, Box 7

Athens, GA 30601

Office #: 706-613-9493

Georgia Ecological Services Website: https://www.fws.gov/office/georgia-ecological-services
Project Planning and Review Procedures: https://www.fws.gov/office/georgia-ecological-

services/project-planning-review

Direct Line: 706-208-7519

Teams: eric_bauer@fws.gov (preferred)

From: Jones, Craig <<u>craig.jones@opc.com</u>>
Sent: Tuesday, July 12, 2022 5:32 PM
To: Bauer, Eric F <<u>eric bauer@fws.gov</u>>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: [EXTERNAL] RE: Rocky Mountain Relicensing Proposed Studies

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Eric,

I'm just following up on the email below from last week. Let me know if there's a good time for you to connect this week or next week.

Best,

ci

From: Jones, Craig

Sent: Thursday, July 7, 2022 6:46 PM **To:** 'Bauer, Eric F' < <u>eric bauer@fws.gov</u>>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Rocky Mountain Relicensing Proposed Studies

Good Afternoon Eric,

I hope your summer is going well. I'm reaching out to see if we can schedule some time next week to

discuss USFWS's comments on the proposed studies, in particular with respect to water quality monitoring. If next week works for you, please let me know when you have some availability, and I'd be happy to coordinate a meeting.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig
To: Marcinek, Paula

Cc: Hakala, Jim; Escobar, Anakela; Steven Layman; Will Pruitt; McCaslin, Tyler

Subject: RE: Rocky Mountain FERC relicensing - Stream Team Data for Heath Creek

Date: Wednesday, July 13, 2022 5:48:10 PM

Attachments: <u>image002.png</u>

Thanks, Paula.

I'm copying Will on this response, and you'll have his email as well now.

Best.

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Wednesday, July 13, 2022 5:40 PM **To:** Jones, Craig <craig.jones@opc.com>

Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Escobar, Anakela <anakela.escobar@dnr.ga.gov>

Subject: Rocky Mountain FERC relicensing - Stream Team Data for Heath Creek

External E-Mail

Hello.

After a phone call with Will Pruitt regarding the fish surveys, I thought about some data that may be useful. Y'all can contact the Stream Survey Team (SST) and request copies of the data sheets from the old surveys for Heath Creek. There could be additional survey notes and observations that are not included in information extracted from the database. I think these field sheets will be useful in helping to understand where the SST reach was located, channel conditions, and if the channel was braided.

Also discussed, if you want to compare the 2022 survey to previous SST surveys and IBI scores, the same reach will need to surveyed (e.g. start point same as the SST's start point). And information about how to lay out a reach and sample in a braided stream can be found in the SST methodology located on the GADNR-WRD website.

The SST contact information:

Program manager Bryant.Bowen@dnr.ga.gov

Biologist Chad.Kaiser@dnr.ga.gov.

I don't have Will's email handy, so please pass along the information.

Thanks!

Paula Marcinek

Aquatic Biologist, Wildlife Conservation

Wildlife Resources Division

M: (404) 323-7751

<u>Facebook</u> • <u>Twitter</u> • <u>Instagram</u> <u>Buy a hunting or fishing license today!</u>

A division of the

GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: McCaslin, Tyler
To: "Ayesha Tarek"

 Cc:
 "Steven Layman"; Jones, Craig; "ER"; "Santiago.Martinez@dca.ga.gov"

 Subject:
 RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Date: Thursday, July 14, 2022 2:49:00 PM

Attachments: 5. PAD Appendix F Cultural Resources 12-10-2021-PRIVILEGED.pdf

image001.png

And here is the privileged cultural resources appendix.

-Tyler

From: McCaslin, Tyler

Sent: Thursday, July 14, 2022 2:49 PM

To: Ayesha Tarek < Ayesha. Tarek@dca.ga.gov>

Cc: Steven Layman <Steven.Layman@kleinschmidtgroup.com>; Jones, Craig <craig.jones@opc.com>; 'ER' <er@dca.ga.gov>; 'Santiago.Martinez@dca.ga.gov'

<Santiago.Martinez@dca.ga.gov>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Ayesha,

I have attached the Pre-Application Document and the privileged cultural resource appendix we filed with FERC in December (appendix to follow as the files are too large to send together). We are updating our cultural resources study plan in coordination with our subcontractor TRC and will forward that shortly.

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7723 Mobile: 404-576-9097 Email: tyler.mccaslin@opc.com Web: www.opc.com



From: ER < er@dca.ga.gov>

Sent: Friday, July 8, 2022 2:43 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>

Cc: Steven Layman < <u>Steven.Layman@kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

That works for both of us – looking forward to the discussion!

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.ga.gov

From: Jones, Craig < com>

Sent: Friday, July 8, 2022 2:05 PM

To: ER < er@dca.ga.gov>

Cc: Steven Layman < <u>Steven.Layman@kleinschmidtgroup.com</u>>; McCaslin, Tyler

<<u>tyler.mccaslin@opc.com</u>>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Santi and Ayesha,

Thanks again for the quick response on dates/times. Let's plan on Monday at 2:00. I'll send a Webex invite soon. Let me know if that doesn't work, and I'll adjust.

Best,

Сj

From: Jones, Craig

Sent: Friday, July 8, 2022 9:01 AM

To: ER < <u>er@dca.ga.gov</u>>

Cc: Steven Layman < Steven.Layman@kleinschmidtgroup.com >; McCaslin, Tyler

<tyler.mccaslin@opc.com>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: Re: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Great. Thanks, Santi. I'll get back to you later today on a time. Best, cj

Sent from my iPad. Please pardon the typsos.

On Jul 8, 2022, at 8:57 AM, ER < <u>er@dca.ga.gov</u>> wrote:

External E-Mail

Craig,

Good morning, sounds good. Ayesha and I are available on Monday, Tuesday, and Wednesday of next week, although I have another meeting at 9 am on Tuesday.

Please let us know what works best for you and we can go from there.

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.qa.qov

From: Jones, Craig <<u>craig.jones@opc.com</u>>

Sent: Thursday, July 7, 2022 4:15 PM

To: ER < <u>er@dca.ga.gov</u>>

Cc: Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<<u>tyler.mccaslin@opc.com</u>>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Santi,

Thanks for the quick response. Essentially, we want to make sure that you all are on board with the approach and schedule. We'll also need to consult with you on the APE and hope to have that wrapped up this month. We're also happy to bring Ayesha up to speed as needed on information we've already provided in the pre-application document (PAD).

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image001.png>

From: ER [mailto:er@dca.ga.gov]
Sent: Thursday, July 7, 2022 4:04 PM
To: Jones, Craig <<u>craig.jones@opc.com</u>>

Cc: Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Ayesha Tarek <<u>Ayesha.Tarek@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Good afternoon, I am replying to confirm that the draft study plan has been received and entered into the queue for review.

Regarding the meeting, I am still the contact on the architectural history side of things, however, Ayesha Tarek (cc'ed on this email) is now the point of contact for archaeology considerations. Please let us know what you have in mind for the meeting and we will go from there.

Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs er@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, July 7, 2022 3:15 PM

To: ER < er@dca.ga.gov>

Cc: Jennifer Dixon < <u>Jennifer.Dixon@dca.ga.gov</u>>; Santiago D. Martinez

<<u>Santiago.Martinez@dca.ga.gov</u>>; Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>;

McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

Oglethorpe Power is preparing to conduct an upcoming cultural resources study for the Rocky Mountain Pumped Storage relicensing process. We would like to meet to discuss the attached draft study plan.

We have previously spoken with Aspen Kemmerlin and Santiago Martinez about our relicensing efforts. However, we understand that Aspen is no longer with HPD (see email string below). Please advise who we should contact to schedule a meeting.

I look forward to touching base on the cultural studies.

Best.

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image002.png>

From: Jones, Craig

Sent: Thursday, July 7, 2022 3:07 PM

To: 'Jennifer Dixon' < <u>Jennifer.Dixon@dca.ga.gov</u>>; Aspen Kemmerlin

<<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler

<<u>tyler.mccaslin@opc.com</u>>; Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Hi Jennifer,

Thanks for the alert. I'll forward the communication to that address.

Best,

ci

From: Jennifer Dixon [mailto:Jennifer.Dixon@dca.ga.gov]

Sent: Thursday, July 7, 2022 3:04 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Aspen Kemmerlin <<u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler

<tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

External E-Mail

Craig,

Aspen no longer works with HPD, and if you could, any submittals should be sent to <u>er@dca.ga.gov</u> – that way it will get to whoever has taken over for Aspen.

Thanks!

Learn more about our commitment to fair housing.

Jennifer Dixon

Division Director, Historic Preservation Division Georgia Department of Community Affairs 60 Executive Park South, NE Atlanta, Georgia 30329

Direct 4044866376

Jennifer.Dixon@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, July 7, 2022 2:57 PM

To: Aspen Kemmerlin < <u>Aspen.Kemmerlin@dca.ga.gov</u>>

Cc: Santiago D. Martinez < <u>Santiago.Martinez@dca.ga.gov</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>; Jennifer Dixon <<u>Jennifer.Dixon@dca.ga.gov</u>>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Rocky Mountain Relicensing Draft Cultural Resources Study Plan

Good Afternoon Aspen,

I hope your summer is going well. We are preparing our upcoming cultural resources study and would like to meet with you to discuss the methods and schedule. I've attached a draft study plan for your review. Do you have some time next week to meet to discuss? If next week works well, let me know some dates and times and I'll work with our folks to coordinate a meeting.

I look forward to touching base on the cultural studies.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image002.png>

Meeting Summary Rocky Mountain Relicensing Water Quality Study

Date and Time: Thursday, July 14, 2022, 1:00-2:00 pm

Location: Virtual Meeting (Webex)

Participants:

Wei Zeng, Georgia Department of Natural Resources – Environmental Protection Division (GEPD)
Stephen Wiedl, GEPD
Elizabeth Booth, GEPD
Craig Jones, Oglethorpe Power Corporation (OPC)
Tyler McCaslin, OPC

Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the proposed study plan and methodology for the Water Quality Assessment study for the relicensing of the Rocky Mountain Project. OPC described the status of the relicensing studies since the Joint Meeting held in March 2022 and comments received to date from GDNR's Wildlife Resources Division and the U.S. Fish and Wildlife Service on the Water Quality Assessment study plan. GEPD expressed interest in continuous water quality monitoring in Heath Creek downstream of the Main Dam and suggested adding one ammonia sample in the summer at a downstream location on Heath Creek to rule out ammonia toxicity as a potential issue relative to native mussels.

From: <u>Jones, Craig</u>

To: Zeng, Wei; Wiedl, Stephen; Booth, Elizabeth

Cc: <u>Steven Layman; McCaslin, Tyler</u>

Subject: RE: Rocky Mountain Relicensing Water Quality Study Update

Date: Thursday, July 14, 2022 12:45:17 PM

Attachments: <u>image001.png</u>

image002.png

Rocky Mountain Draft Study Plans 07-14-2022 EPD.PDF

Hi Everyone,

I'm looking forward to chatting shortly. Attached is a draft study plan that we want to share with you. The WQ study is in section 2. The study plan was modified to address comments from DNR WRD and USFWS.

Best.

ci

From: Jones, Craig

Sent: Wednesday, July 13, 2022 11:55 AM

To: 'Zeng, Wei' < Wei.Zeng@dnr.ga.gov>; 'Wiedl, Stephen' < Stephen.Wiedl@dnr.ga.gov>; 'Booth,

Elizabeth' < Elizabeth. Booth@dnr.ga.gov>

Cc: 'Steven Layman' <Steven.Layman@Kleinschmidtgroup.com>; McCaslin, Tyler

<tyler.mccaslin@opc.com>

Subject: RE: Rocky Mountain Relicensing Water Quality Study Update

Just cancelled the first invite and resent for tomorrow at 1:00. Apologies for the confusion! Best, ci

From: Jones, Craig

Sent: Wednesday, July 13, 2022 11:52 AM

To: 'Zeng, Wei' < Wei.Zeng@dnr.ga.gov >; Wiedl, Stephen < Stephen.Wiedl@dnr.ga.gov >; Booth,

Elizabeth < Elizabeth.Booth@dnr.ga.gov >

Cc: Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tyler.mccaslin@opc.com>

Subject: RE: Rocky Mountain Relicensing Water Quality Study Update

Thanks, Wei. Will do. cj

From: Zeng, Wei [mailto:Wei.Zeng@dnr.ga.gov]

Sent: Wednesday, July 13, 2022 11:51 AM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Wiedl, Stephen <<u>Stephen.Wiedl@dnr.ga.gov</u>>; Booth,

Elizabeth < Elizabeth.Booth@dnr.ga.gov >

Cc: Steven Layman < <u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tvler.mccaslin@opc.com>

Subject: Re: Rocky Mountain Relicensing Water Quality Study Update

External E-Mail

Craig,

Your appointment seems to be at 1:00 today rather than tomorrow. Could you correct and resend, please?

Thanks.

Wei

From: Jones, Craig < craig.jones@opc.com>
Sent: Wednesday, July 13, 2022 11:31 AM

To: Zeng, Wei < Wei. Zeng@dnr.ga.gov >; Wiedl, Stephen < Stephen. Wiedl@dnr.ga.gov >; Booth,

Elizabeth < Elizabeth.Booth@dnr.ga.gov >

Cc: Steven Layman <<u>Steven.Layman@Kleinschmidtgroup.com</u>>; McCaslin, Tyler

<tyler.mccaslin@opc.com>

Subject: RE: Rocky Mountain Relicensing Water Quality Study Update

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for the quick responses, Stephen and Wei. It looks as if tomorrow at 1:00 pm will work well for us. Given the limited availability next week on our end as well, let's go with that. Hopefully, that works for Elizabeth.

I'll go ahead and send a Webex invite to hold the time, and we can adjust as needed. I look forward to the discussion

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Zeng, Wei [mailto:Wei.Zeng@dnr.ga.gov]

Sent: Wednesday, July 13, 2022 8:56 AM

To: Wiedl, Stephen < Stephen.Wiedl@dnr.ga.gov >; Jones, Craig < craig.jones@opc.com >; Booth, Elizabeth < Elizabeth.Booth@dnr.ga.gov >

Subject: Re: Rocky Mountain Relicensing Water Quality Study Update

External E-Mail

Thursday July 14, 9:00-11:00, 1:00-3:00, and 4:00-5:00;

Thursday July 21, 1:00-2:00, and 3:00-5:00;

Thanks.

Wei

From: Wiedl, Stephen < Stephen.Wiedl@dnr.ga.gov>

Sent: Tuesday, July 12, 2022 6:07 PM

To: Jones, Craig <<u>craig.jones@opc.com</u>>; Zeng, Wei <<u>Wei.Zeng@dnr.ga.gov</u>>; Booth, Elizabeth

<<u>Elizabeth.Booth@dnr.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Water Quality Study Update

This Friday (7-15-22) and next Friday (7-22-22) are not good for me. Otherwise my schedule is open the next couple of weeks.

Stephen C. Wiedl, PWS

Manager – Wetlands Unit
Georgia Environmental Protection Division
7 Martin Luther King, Jr. Drive, Suite 450

Atlanta, GA 30334

404-452-5060

Stephen.Wiedl@dnr.ga.gov

From: Jones, Craig <<u>craig.jones@opc.com</u>>

Sent: Tuesday, July 12, 2022 5:41 PM

To: Zeng, Wei < Wei.Zeng@dnr.ga.gov >; Booth, Elizabeth < Elizabeth.Booth@dnr.ga.gov >; Wiedl,

Stephen <<u>Stephen.Wiedl@dnr.ga.gov</u>>

Subject: Rocky Mountain Relicensing Water Quality Study Update

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Evening Everyone,

I'm reaching out to see if we can schedule some time this week or next to discuss the relicensing water quality study. Primarily we want to give you an update on our progress and answer any questions you may have.

Please let me know if there are some dates this week or next that work well for you, and I'll be happy to coordinate a meeting.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

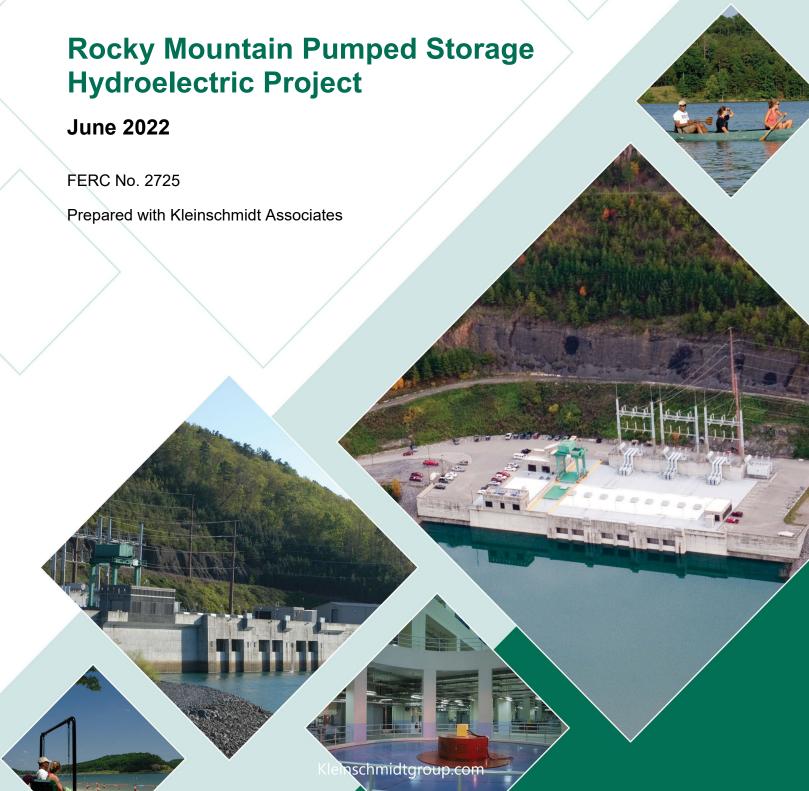


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June 2022 iii

1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

June 2022 Project Control No. 0498003.01

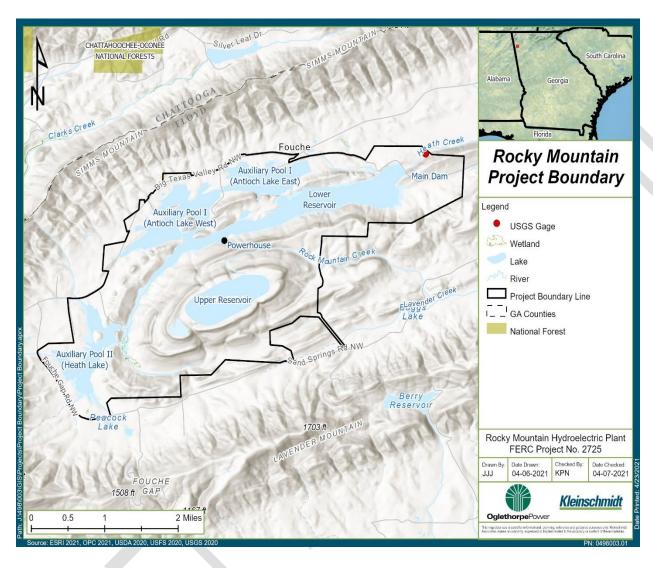


Figure 1 Project Boundary Map

2.0 WATER QUALITIY ASSESSMENT

OPC will conduct a study characterizing existing water quality at the Rocky Mountain Project. The study will supplement the existing robust water quality data set available for the Project, as summarized in the PAD, and will be accomplished through a combination of new water quality monitoring at representative locations within the project boundary and compilation and analysis of existing water quality data.

2.1 Objectives

The specific objectives of this study are to:

- Characterize existing water quality in the Rocky Mountain study area.
- Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application.

2.2 Study Area

The study area includes the Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary.

2.3 Methodology

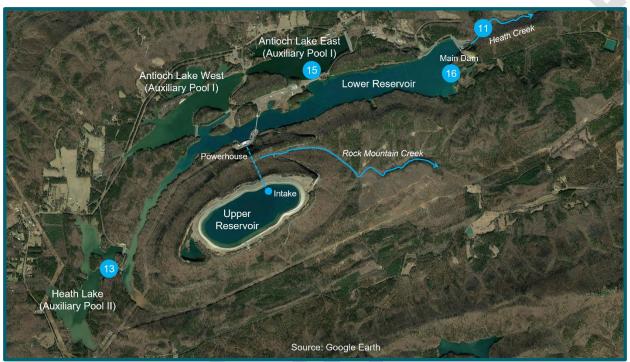
OPC's approach to the water quality assessment consists of the following study elements:

- Compile and analyze water quality data collected by OPC and GDNR at the Project between 1996 and 2020.
- Conduct one year of monthly water quality monitoring at four historic stations within the project boundary to characterize current conditions.

Monthly water quality monitoring will be conducted from June 2022 through May 2023 at historic stations RM11 (Heath Creek downstream of Main Dam), RM13 (Heath Lake), RM15 (Antioch Lake East), and RM16 (Lower Reservoir near the Main Dam) (Figure 2). The Upper Reservoir is not included in monitoring because it exchanges a large volume of water daily with the Lower Reservoir, both reservoirs fluctuate substantially and remain well mixed throughout the water column, and Lower Reservoir water quality is therefore also representative of Upper Reservoir water quality. Rock Mountain Creek is not included

June 2022 2-1

in monitoring because there is no outlet from the Upper Reservoir to the creek and previous water quality sampling in Rock Mountain Creek has indicated that water quality of the creek is unaffected by project operation.



Blue circles indicate station numbers RM11, RM13, RM15, and RM16.

Figure 2 Proposed Water Quality Monitoring Stations in 2022-2023

Monthly water quality monitoring will include *in-situ* measurements of water temperature, dissolved oxygen (DO) concentration, pH, specific conductance, and turbidity using an electronic multi-parameter water quality measurement sonde. Measurements will be taken at a depth of 1 meter (m) at the impoundment stations (RM13, RM15, and RM16) and at mid-depth in Heath Creek (RM11). The water quality measurement sonde will be calibrated prior to each monitoring event.

During each monthly event, grab samples of water also will be collected at 1-m depth at the impoundment stations and at mid-depth in Heath Creek and analyzed in the laboratory for 5-day biological oxygen demand, ammonia, inorganic nitrogen (nitratenitrite), total Kjeldahl nitrogen, ortho-phosphate, and total phosphorus.

For the Heath Creek monitoring location, to be responsive to FWS's request for continuous monitoring and address GDNR's comment about minimizing the effects of temporal variation of monthly water quality data collection, OPC will conduct continuous

monitoring of DO concentration and water temperature in Heath Creek downstream of the Main Dam (RM11) for one year beginning in June 2022. A dissolved oxygen data logger will be placed in the stream within the direct influence of releases from the Main Dam and where the channel cross section is relatively uniform in depth and the water well mixed. Placement of the data logger will be determined in consultation with GDNR and based on field measurements of DO within the reach between the Main Dam and USGS gage during the initial water quality monitoring event. The data logger will record DO and water temperature every hour and will be downloaded and maintained monthly throughout the monitoring period.

A Water Quality Assessment Report will be prepared and provided to stakeholders with the Draft License Application (DLA) for review and comment. The monitoring results and historic water quality data will be summarized in tables and figures and analyzed with respect to applicable state water quality criteria and any evident water quality trends related to project operations and maintenance or project-related recreation.

Additionally, OPC will evaluate the results of the Water Quality Assessment in conjunction with the results of the fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GDNR and FWS to determine whether a second year of water quality monitoring is warranted.

2.4 Schedule

The Water Quality Assessment study will be completed according to the milestones in Table 1.

Table 1 Schedule for Water Quality Assessment

Activity	Date or Deadline		
Begin data compilation and monthly sampling	June 2022		
Complete one year of monthly sampling	May 2023		
Prepare study report	December 2023		
File study report with DLA for stakeholder review	Estimated February 2024		

3.0 AQUATIC RESOURCES STUDY

OPC will conduct a study characterizing the existing communities of fish and mussels in Heath Creek downstream of the Project for evaluating the effects of continued project operation on aquatic habitat downstream. The study will be accomplished through a fish community survey and a freshwater mussel survey, to be conducted in 2022.

3.1 Objectives

The specific objectives of this study are to:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project.
- Develop aquatic resources information sufficient for analyzing the effects of continued project operation on aquatic habitat downstream of the project in the license application, including assessing the presence/absence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails.

3.2 Study Area

The study area includes Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek, a reach of approximately 5 miles (Figure 3).

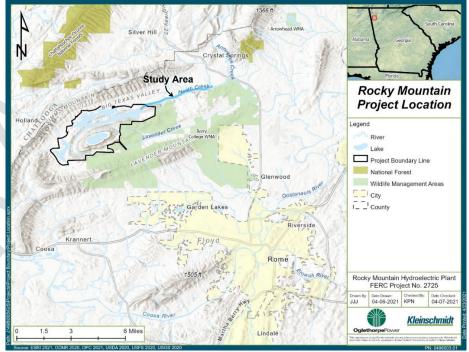


Figure 3 Heath Creek Study Area for Aquatic Resources Study

June 2022 Project Control No. 0498003.01

3.3 Methodology

OPC's approach to the aquatic resources study includes the following key elements.

Fish Community Survey

Consistent with GDNR recommendations fish community sampling will be conducted at two representative locations on Heath Creek in 2022, including a station near the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) within the project boundary and a station previously surveyed by the GDNR Stream Team in 2001-2002 located about 2.5 miles downstream of the Main Dam at Texas Valley Road. Each station will be surveyed once during the period June-September 2022 following the GDNR's Standard Operating Procedures (SOP) for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GDNR 2020a).

Prior to sampling, reconnaissance and stream measurements will take place at each sampling to station calculate mean stream width (MSW). Reach of stream to be sampled will be 35 times the MSW. Additionally, MSW will be used to determine the number of backpack electrofishing units (BPEFs) and netters required to efficiently sample the area in accordance with the referenced SOP.

The fisheries sampling will take place in an upstream direction starting at the downstream end of the sampling reach. Collected fish will be identified to species, enumerated, weighed, and returned to the stream. The fish community data will be analyzed using the multi-metric Index of Biotic Integrity (IBI) to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion (GDNR 2020b). The IBI integrates characteristics of the fish community, population, and individuals to assess fish health and biologic integrity. Metrics are based on species richness, evenness, feeding guilds, habitat use, species sensitivity or tolerance to pollutants. Total IBI scores will fall within one of five integrity classes (excellent, good, fair, poor, or very poor) and will be compared to the IBI scores obtained by the GDNR Stream Team for Heath Creek in 2001-2002.

Freshwater Mussel Survey

A survey for mussels and aquatic snails will be conducted in representative habitats in Heath Creek in 2022 to characterize the occurrence, distribution, relative abundance, and species richness of the native freshwater mollusk community. The survey will include habitats with potential to support RTE species of mussels and snails (mollusks). Based on known element of occurrence records (historic or present) and species range and habitat data, ten state and/or federally protected mollusk species, and one mussel species under federal review for listing, potentially occur in the project vicinity, including several species with historic occurrence records in the Armuchee Creek watershed, and therefore, potential to occur in Heath Creek (Table 2).

Table 2 Rare, Threatened, and Endangered Freshwater Mollusk Species with Known Records of Occurrence in Floyd County

Scientific Name	Common Name	Federal Status ^a	Georgia Status ^b
Mussels:			
Elliptio arca	Alabama spike		E
Hamiota altilis	Finelined pocketbook	LT	Т
Medionidus acutissimus	Alabama moccasinshell	LT	E
Medionidus parvulus	Coosa moccasinshell	LE	E
Pleurobema decisum	Southern clubshell	LE	E
Pleurobema georgianum	Southern pigtoe	LE	E
Ptychobranchus foremanianus	Rayed kidneyshell	LE	E
Ptychobranchus greenii	Triangular kidneyshell	LE	
Villosa umbrans	Coosa creekshell	UR	R
Snails:			
Leptoxis foremani	Interrupted rocksnail	LE	E
Pleurocera showalteri	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

The survey will be conducted by a team of biologists experienced in the collection of freshwater mussels and snails led by a malacologist who brings extensive knowledge of the mollusk fauna of the Coosa River basin in Georgia, under the authority of scientific collecting permits issued by GDNR and FWS.

^b Georgia state status: E = endangered; T = threatened; R = rare.

The search reach on Heath will extend from the Main Dam downstream approximately 5 stream miles to the confluence with Little Armuchee Creek. Using snorkeling gear, surveyors will begin at the downstream end of the reach and work upstream bank to bank. All live mussels and snails will be identified to species and returned to the substrate where they were found. Substrate characteristics along the study reach will be documented. All mussels will be measured to the nearest millimeter (long axis). The survey will take place in June-September 2022.

At least one voucher specimen of each mussel species found fresh dead will be retained and deposited at a regional malacological collection. Live mussels will be photographed and returned to the river bottom where they were found. FWS and GDNR will be notified within 24 hours if a federally protected species is found in the survey area.

Reporting

An Aquatic Resources Study Report will be prepared that characterizes aquatic resources present in Heath Creek downstream of the Project. A separate freshwater mussel survey report will be appended to the study report, and the mussel survey findings will be summarized in the main study report. The fish and mussel survey results will be presented in tables and figures, as appropriate, and analyzed with respect to species occurrence, species richness, relative abundance, biotic integrity, and other community attributes. The study results will be used in the DLA to analyze the effects of continued project operation on aquatic resources downstream of the Project.

3.4 Schedule

The Aquatic Resources Study will be completed according to the milestones in Table 3.

Table 3 Schedule for Aquatic Resources Study

Activity	Date or Deadline	
Conduct fish community survey	June-September 2022	
Conduct mussel survey	June-September 2022	
Prepare study report	February 2023	
File study report with DLA for stakeholder review	Estimated February 2024	

3.5 References

GDNR (Georgia Department of Natural Resources). 2020a. Part I: Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Stream in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

GDNR (Georgia Department of Natural Resources). 2020b. Part IV: Scoring Criteria for the Index of Biotic Integrity to Monitor Fish Communities in Wadeable Stream in the Coosa and Tennessee Drainage Basin of the Ridge and Valley Ecoregion in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

4.0 TERRESTRIAL AND WETLAND RESOURCES SURVEY

OPC will conduct a study to characterize existing terrestrial wildlife and botanical resources and wetlands and riparian resources at the Rocky Mountain Project through a field reconnaissance survey and the use of existing information and data. This study plan combines wildlife and botanical resources as described in Section 4.5 of the PAD; wetlands, riparian, and littoral habitat as described in Section 4.6 of the PAD; and RTE terrestrial plants and wildlife as described in Section 4.7 of the PAD into a single consolidated survey effort.

4.1 Objectives

The specific objectives of this study are to:

- Describe terrestrial wildlife and botanical resources occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Describe floodplain, wetlands, and riparian habitats occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Prepare a map of the principal vegetation community types in the project boundary, including wetlands.
- Identify potentially suitable habitat for RTE species of plants and animals in the project boundary.
- Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and terrestrial RTE species of plants and wildlife in the license application.

4.2 Study Area

The study area includes the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

4.3 Methodology

OPC's approach to the terrestrial and wetland resources survey consists of the following study elements.

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June 2022

Review of Existing Information

Descriptions of existing terrestrial and wetland resources in the study area (i.e., wildlife and botanical resources; wetlands, riparian, and littoral habitat; and terrestrial RTE plant and wildlife species) will be based on review of existing information summarized in the PAD, including, but not limited to, the following sources:

- Terrestrial Management Plan for the Rocky Mountain Project (GDNR 2013)
- The Natural Communities of Georgia (Edwards et al. 2013)
- Georgia State Wildlife Action Plan (GDNR 2015)
- GDNR's online Georgia Biodiversity Portal
- USFWS Environmental Conservation Online System
- Field Guide to the Rare Plants of Georgia (Chafin 2007)
- Georgia Exotic Pest Plant Council's list of non-native plants in Georgia
- National Audubon Society's Christmas bird count historical data
- USFWS National Wetlands Inventory (NWI) data
- USGS topography
- Google Earth aerial imagery

Field Reconnaissance Survey

A field reconnaissance survey of the study area, concentrating mainly on uplands and wetlands around the project waters and project recreation areas will be conducted in appropriate seasons to observe representative terrestrial and wetland vegetive communities and associated wildlife habitat. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources in the major vegetative community types identified in the Terrestrial Management Plan for the Project (GDNR 2013), and in fall 2022 and spring 2023 to survey for RTE plant species flowering in those seasons.

Teams of two biologists/ecologists will visually assess upland, wetland, and riparian communities, by boat along the shorelines of the Lower Reservoir and Auxiliary Pools and by pedestrian surveys of project recreation areas and floodplains of Heath Creek and other streams, wetlands, and potentially unique or sensitive habitats. During the survey, vegetation community types encountered will be described and field notes recorded as

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to dominant species, presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation habitat types. Unique habitats, or areas where sensitive species might occur, will be GPS-located. Where encountered, field teams will also identify wildlife species and their spoor (scat, tracks, scents, burrows, etc.).

The RTE species list provided in the PAD will be updated prior to the field survey and utilized as the foundation for visually searching for and identifying potentially suitable habitat for RTE species within the study area. Should RTE species be encountered, species/population information, habitat attributes, GPS location, and other relevant data will be recorded so that findings data can be transmitted to the appropriate agency and documented for the study report. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected will be shared only with the agencies having jurisdiction over the resource and will be filed as privileged (non-public) information.

Reporting

A Terrestrial and Wetland Resources Survey Report will be prepared and provided to stakeholders with the DLA for review and comment. The survey findings will be summarized in tables and figures. The study report will also provide a vegetation community map, including wetlands. The study results will be used in the DLA to analyze the effects of continued project operation and maintenance and project-related recreation on terrestrial and wetland resources and RTE species of plants and wildlife.

4.4 Schedule

The Terrestrial and Wetland Resources Survey will be completed according to the milestones in Table 4.

Table 4 Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline
Conduct field reconneissance surveys	June-September 2022;
Conduct field reconnaissance surveys	April 2023
Prepare study report	August 2023
File study report with DLA for stakeholder review	Estimated February 2024

4.5 References

- Chafin, L.G. 2007. Field Guide to the rare plants of Georgia. State Botanical Garden of Georgia and University of Georgia Press, Athens.
- Edwards, L., J. Ambrose, and L. K. Kirkman. 2013. The natural communities of Georgia. Photographs by Hugh and Carol Nourse. The University of Georgia Press, Athens, Georgia.
- Georgia Department of Natural Resources (GDNR). 2013. Terrestrial Management Plan for Rocky Mountain Hydroelectric Plant and Recreation & Public Fishing Area. Spring 2013.
- Georgia Department of Natural Resources (GDNR). 2015. State Wildlife Action Plan. Wildlife Resources Division. Social Circle, Georgia.

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5.0 RECREATION USE ANALYSIS

OPC will conduct a study characterizing existing recreational use at the Rocky Mountain Project for evaluating the potential effects of continued project operation and maintenance on recreation resources in the license application. This study will be accomplished through the compilation and analysis of abundant existing recreational use information and field activities to inventory and describe existing facilities and survey recreation users at the Project.

5.1 Objectives

The specific objectives of this study are to:

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project.
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application.

5.2 Study Area

The study area includes the Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). The Rocky Mountain PFA contains Auxiliary Pool I (Antioch Lake East and West), Auxiliary Pool II (Heath Lake), and other recreation areas (e.g., hiking and biking trails) within the project boundary. Auxiliary Pools I and II are shown in Figure 1.

5.3 Methodology

A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified.

As recommended by GDNR, OPC will conduct on-site recreation surveys to collect data on public use characteristics and user satisfaction levels. Recreation users at the Project

June 2022 Project Control No. 0498003.01 will be surveyed on 15 days between June 2022 and May 2023¹. The purpose of these onsite surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities; annual recreation use will be estimated using GDNR traffic count data, as described below. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays), with an emphasis towards non-peak weekends, using the survey form developed in consultation with GDNR (Figure 4). A general schedule is provided in Table 5. A twoperson field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

Table 5 **General Survey Schedule**

Survey #	Month, Year	Day Type	Entrances
1	June 2022	Weekend	Main, Beach
2	July 2022	Holiday	Main, Beach, Heath
3	July 2022	Weekday	Main, Beach
4	August 2022	Weekend	Main, Beach, Heath
5	August 2022	Weekday	Main, Beach
6	September 2022	Weekend	Main, Beach, Heath
7	September 2022	Weekday	Main, Beach
8	October 2022	Weekend	Main, Beach, Heath
9	October 2022	Weekend	Main, Beach

¹ During discussions with GDNR on April 22, 2022, GDNR indicated they may be able to provide an intern to conduct additional surveys at the Rocky Mountain PFA. If GDNR is able to employ an intern to conduct surveys, the survey schedule will be revised.

5-2

Project Control No. 0498003.01

Survey #	Month, Year	Day Type	Entrances
10	March 2023	Weekend	Main, Beach, Heath
11	March 2023	Weekday	Main, Beach
12	April 2023	Weekend	Main, Beach, Heath
13	April 2023	Weekend	Main, Beach
14	May 2023	Weekday	Main, Beach, Heath
15	May 2023	Weekend	Main, Beach

OPC's recreation survey methodology and level of effort are similar to those used by GDNR in a 2006-2007 recreation survey of the Rocky Mountain PFA, and they are consistent with generally accepted practice in relicensing recreation studies. As such, the recreation survey is expected to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the PFA facilities, and for comparison with the 2006-2007 survey results.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GDNR (Figure 5).

Current recreational use will be determined using existing data and information collected by GDNR, including attendance records, traffic count data, and staff observations; these sources of data were used to develop the 2015 Form 80 recreation report filed with FERC. It is OPC's understanding that GDNR continuously collects traffic count data using counter devices installed at the three Rocky Mountain PFA entrances. OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022 for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days." FERC defines a recreation day as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

Estimated projections of future recreation use at the Project will be developed using the average annual increase in population growth over the past 10 years for Floyd County, Georgia, as reported by the U.S. Census Bureau. The increase in population will be applied to the annual use estimates for the Project to determine a future recreation use estimate. This information will be considered when determining future recreation needs at the Project.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GDNR.

A Recreational Use Analysis Report will be prepared and provided to stakeholders with the DLA for review and comment. The study report will characterize existing recreation use and evaluate the need for recreational access or facility improvements.

5.4 Schedule

The Recreational Use Analysis will be completed according to the milestones in Table 6.

Table 6 Schedule for Recreational Use Analysis

Activity	Date or Deadline			
Conduct surveys	June-October 2022, March- May 2023			
Analyze data	June-July 2023			
Prepare study report	September 2023			
File study report with DLA for stakeholder review	Estimated February 2024			

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Mai	n Beach	_ Heath	Da	te:			Time:	1	
Interviewer:									
Vehicle Type: Vehicle w/ Trailer Vehicle w/o Trailer RV/Camper									
1. What is your county and state of residence? County: State:									
2. How many people are in your vehicle today? people									
3. What is your age?	·	_16-24		_25-34		35-44		_45-54	55+
4. If you came with	others, what are the	ir age gro	ups? (check all	that a	apply)			
Children (Infant	rs-12)Youth	(13-17)		Adults	(18-55	5)	Seni	or Adults (over 55)
5. How did you hear									
Friend/Relativ	e	Social M	edia						_Other
6. How many times	(including today), ha	ave you vis	sited I	Rocky Mt	n PFA	in the la	ast 30 c	lays?	
7. What is the prima	ry reason for your v	isit today	? (che	ck all tha	t appl	y)		,	
Boat Fishing	Picnicking		Hi	king		\	Can	oeing/kaya	aking
Bank Fishing	Swimming		Bil	king			Wild	dlife viewir	ıg
Camping	Hunting	_	Ple	easure Bo	ating		Sho	reline rela	kation
Other:									
8. If you came to fis	h today, how would	you rate y	our fi	shing exp	erien	ice?			
Very Good (5)	Good (4)	Fair	(3)		Pc	or (2)		Very l	Poor (1)
9. If you came to fis	h today, where did y	ou fish? (d	check	all that a	pply)				
	Antioch Lake EastAntioch Lake West Heath Lake								
10. If you came to h	unt today, how wou		_	r hunting					
Very Good (5)	Good (4)	Fair				or (2)			Poor (1)
11. Please rate the o		g facilities	at thi	is access a	area.	(choose	one fo	r each)	
Parking:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Boat Ramp:	Very Good (5)	Good		Fair	(3)	Poo	or (2)	Very	Poor (1)
Docks:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Restrooms:	Very Good (5)	Good	d (4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Beach:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Picnic Areas:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Campsites:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Trails:	Very Good (5)	Good		Fair		Pod	or (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Good		Fair	(3)	Pod	or (2)		Poor (1)
12. What type of vis								· '	
Daily	Daily	<u> </u>		Daily	,,			Daily	
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other									
comments or suggestions.									

Figure 4 Recreation Survey Form

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:				ne:					
1. What is your county and state of residence?		County: St		Stat	State:				
2. How many people are staying in your campsite			tor	night?	pe	ople			
3. What is your age	.?	_18-24		_25-34	3	35-44		45-54	55+
4. If you came with	others, what are t	heir age gro	ups	? (check al	I that a	pply)			
Children (Infar		h (13-17)		Adults (1				or Adults	(over 55)
5. How would you	rate the online boo	king experi	ence	e for camp			ons?		
Very Good (5)	Good (4)	Fair	<u> </u>		_Poor	•		Very	Poor (1)
6. What activities a		g in while c	amp		k all th	at app			
Boat Fishing	Picnicking			_Hiking				Canoeing/	
Bank Fishing	Swimming			_Biking				Vildlife Vi	
Hunting	Pleasure Boat	ing		_Shoreline	relaxat	ion		Other (list	below):
7. While camping a	t Rocky Mountain	PFA, are yo	u sta						
Tent	RV			Tent/RV				_Group Ca	mp
8. If you came to fis			_	r fishing ex	•				
Very Good (5)									
9. If you came to hi				ur hunting			-		
Very Good (5)	Good (4) Fair (3) Poor (2) Very Poor (1)								
10. Please rate the				_					
Campsite:	Very Good (5)	Good	•	Fair (3		_Poo			Poor (1)
Playground:	Very Good (5)	Good	•	Fair (3		_Poo			Poor (1)
Restrooms:	Very Good (5)	Good	• •	Fair (3		_Poo	• •		Poor (1)
Cleanliness:	Very Good (5)	Good (` '	Fair (3		_Poo			Poor (1)
Bank Fishing:	Very Good (5)	Good (` ,)Fair (3)Poor		r (2)	Very	Poor (1)	
11. What type of vi		you have? (che		• • • •	ı			
DailyAnnualCampgroundNone									
12. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and									
any other commen	ts or suggestions.								

Figure 5 Campground User Survey Form

From: Jones, Craig
To: Bauer, Eric F

Cc: <u>Steven Layman</u>; <u>McCaslin, Tyler</u>

Subject: Draft Fish, Mussel, Terrestrial and Botanical Study Plans for RM Relicensing

Date: Wednesday, July 20, 2022 2:14:12 PM

Attachments: <u>image003.png</u>

Rocky Mountain Draft Study Plans 06-15-2022 FWS.pdf

Eric,

Again, as discussed, attached are is a document with our draft study plans for the other resource areas

Best,

cj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

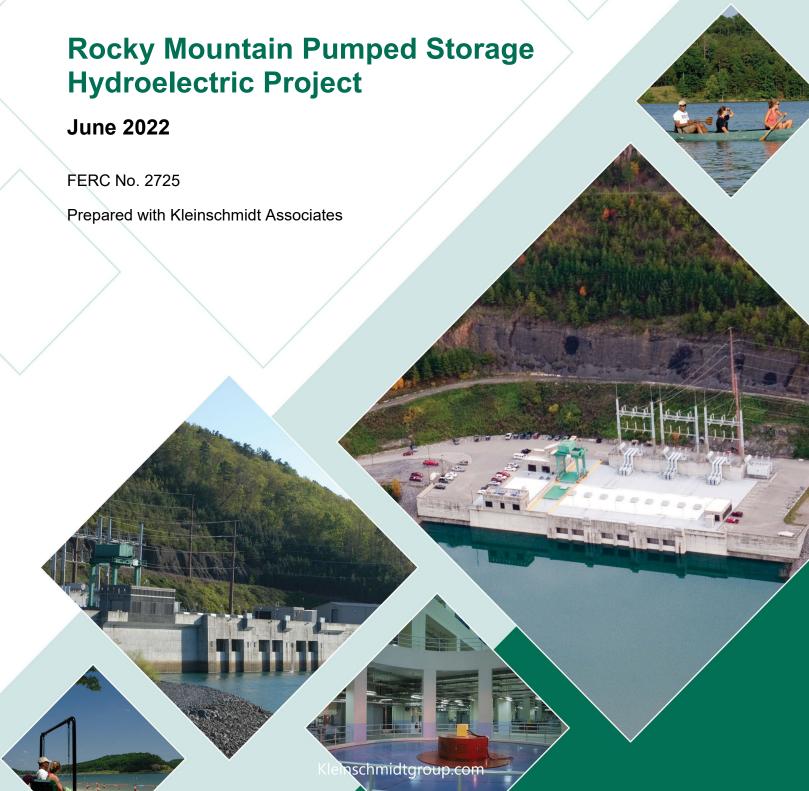


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June 2022 iii

1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

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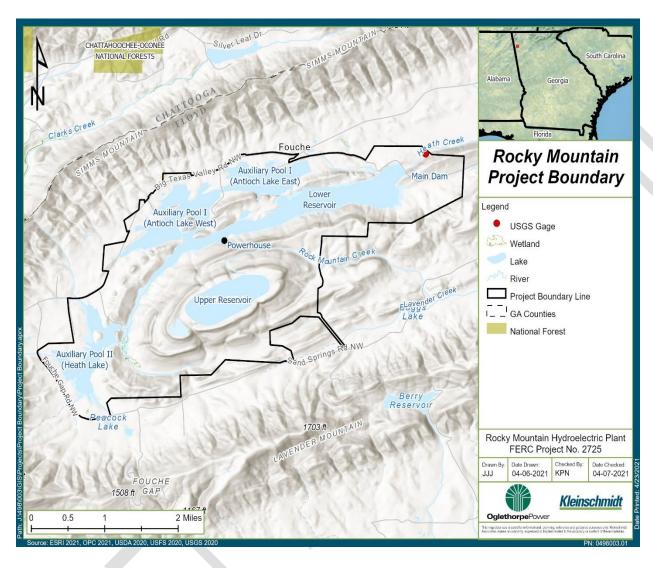


Figure 1 Project Boundary Map

2.0 WATER QUALITIY ASSESSMENT

OPC will conduct a study characterizing existing water quality at the Rocky Mountain Project. The study will supplement the existing robust water quality data set available for the Project, as summarized in the PAD, and will be accomplished through a combination of new water quality monitoring at representative locations within the project boundary and compilation and analysis of existing water quality data.

2.1 Objectives

The specific objectives of this study are to:

- Characterize existing water quality in the Rocky Mountain study area.
- Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application.

2.2 Study Area

The study area includes the Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary.

2.3 Methodology

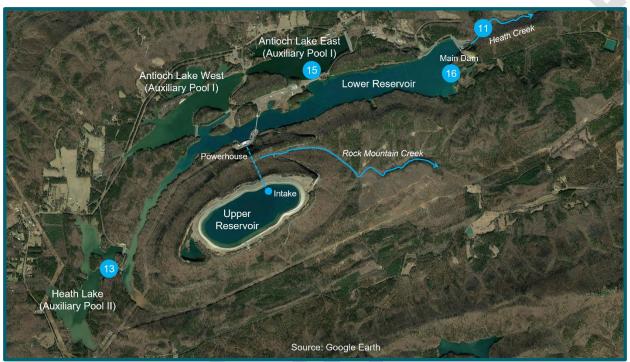
OPC's approach to the water quality assessment consists of the following study elements:

- Compile and analyze water quality data collected by OPC and GDNR at the Project between 1996 and 2020.
- Conduct one year of monthly water quality monitoring at four historic stations within the project boundary to characterize current conditions.

Monthly water quality monitoring will be conducted from June 2022 through May 2023 at historic stations RM11 (Heath Creek downstream of Main Dam), RM13 (Heath Lake), RM15 (Antioch Lake East), and RM16 (Lower Reservoir near the Main Dam) (Figure 2). The Upper Reservoir is not included in monitoring because it exchanges a large volume of water daily with the Lower Reservoir, both reservoirs fluctuate substantially and remain well mixed throughout the water column, and Lower Reservoir water quality is therefore also representative of Upper Reservoir water quality. Rock Mountain Creek is not included

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in monitoring because there is no outlet from the Upper Reservoir to the creek and previous water quality sampling in Rock Mountain Creek has indicated that water quality of the creek is unaffected by project operation.



Blue circles indicate station numbers RM11, RM13, RM15, and RM16.

Figure 2 Proposed Water Quality Monitoring Stations in 2022-2023

Monthly water quality monitoring will include *in-situ* measurements of water temperature, dissolved oxygen (DO) concentration, pH, specific conductance, and turbidity using an electronic multi-parameter water quality measurement sonde. Measurements will be taken at a depth of 1 meter (m) at the impoundment stations (RM13, RM15, and RM16) and at mid-depth in Heath Creek (RM11). The water quality measurement sonde will be calibrated prior to each monitoring event.

During each monthly event, grab samples of water also will be collected at 1-m depth at the impoundment stations and at mid-depth in Heath Creek and analyzed in the laboratory for 5-day biological oxygen demand, ammonia, inorganic nitrogen (nitratenitrite), total Kjeldahl nitrogen, ortho-phosphate, and total phosphorus.

For the Heath Creek monitoring location, to be responsive to FWS's request for continuous monitoring and address GDNR's comment about minimizing the effects of temporal variation of monthly water quality data collection, OPC will conduct continuous

monitoring of DO concentration and water temperature in Heath Creek downstream of the Main Dam (RM11) for one year beginning in June 2022. A dissolved oxygen data logger will be placed in the stream within the direct influence of releases from the Main Dam and where the channel cross section is relatively uniform in depth and the water well mixed. Placement of the data logger will be determined in consultation with GDNR and based on field measurements of DO within the reach between the Main Dam and USGS gage during the initial water quality monitoring event. The data logger will record DO and water temperature every hour and will be downloaded and maintained monthly throughout the monitoring period.

A Water Quality Assessment Report will be prepared and provided to stakeholders with the Draft License Application (DLA) for review and comment. The monitoring results and historic water quality data will be summarized in tables and figures and analyzed with respect to applicable state water quality criteria and any evident water quality trends related to project operations and maintenance or project-related recreation.

Additionally, OPC will evaluate the results of the Water Quality Assessment in conjunction with the results of the fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GDNR and FWS to determine whether a second year of water quality monitoring is warranted.

2.4 Schedule

The Water Quality Assessment study will be completed according to the milestones in Table 1.

Table 1 Schedule for Water Quality Assessment

Activity	Date or Deadline		
Begin data compilation and monthly sampling	June 2022		
Complete one year of monthly sampling	May 2023		
Prepare study report	December 2023		
File study report with DLA for stakeholder review	Estimated February 2024		

3.0 AQUATIC RESOURCES STUDY

OPC will conduct a study characterizing the existing communities of fish and mussels in Heath Creek downstream of the Project for evaluating the effects of continued project operation on aquatic habitat downstream. The study will be accomplished through a fish community survey and a freshwater mussel survey, to be conducted in 2022.

3.1 Objectives

The specific objectives of this study are to:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project.
- Develop aquatic resources information sufficient for analyzing the effects of continued project operation on aquatic habitat downstream of the project in the license application, including assessing the presence/absence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails.

3.2 Study Area

The study area includes Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek, a reach of approximately 5 miles (Figure 3).

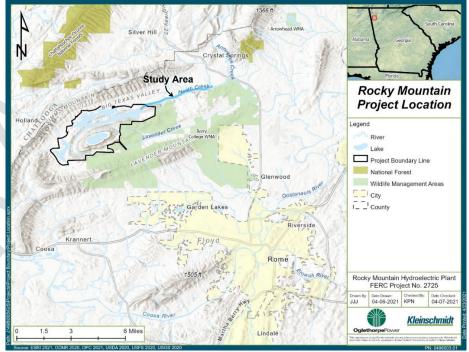


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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3.3 Methodology

OPC's approach to the aquatic resources study includes the following key elements.

Fish Community Survey

Consistent with GDNR recommendations fish community sampling will be conducted at two representative locations on Heath Creek in 2022, including a station near the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) within the project boundary and a station previously surveyed by the GDNR Stream Team in 2001-2002 located about 2.5 miles downstream of the Main Dam at Texas Valley Road. Each station will be surveyed once during the period June-September 2022 following the GDNR's Standard Operating Procedures (SOP) for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GDNR 2020a).

Prior to sampling, reconnaissance and stream measurements will take place at each sampling to station calculate mean stream width (MSW). Reach of stream to be sampled will be 35 times the MSW. Additionally, MSW will be used to determine the number of backpack electrofishing units (BPEFs) and netters required to efficiently sample the area in accordance with the referenced SOP.

The fisheries sampling will take place in an upstream direction starting at the downstream end of the sampling reach. Collected fish will be identified to species, enumerated, weighed, and returned to the stream. The fish community data will be analyzed using the multi-metric Index of Biotic Integrity (IBI) to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion (GDNR 2020b). The IBI integrates characteristics of the fish community, population, and individuals to assess fish health and biologic integrity. Metrics are based on species richness, evenness, feeding guilds, habitat use, species sensitivity or tolerance to pollutants. Total IBI scores will fall within one of five integrity classes (excellent, good, fair, poor, or very poor) and will be compared to the IBI scores obtained by the GDNR Stream Team for Heath Creek in 2001-2002.

Freshwater Mussel Survey

A survey for mussels and aquatic snails will be conducted in representative habitats in Heath Creek in 2022 to characterize the occurrence, distribution, relative abundance, and species richness of the native freshwater mollusk community. The survey will include habitats with potential to support RTE species of mussels and snails (mollusks). Based on known element of occurrence records (historic or present) and species range and habitat data, ten state and/or federally protected mollusk species, and one mussel species under federal review for listing, potentially occur in the project vicinity, including several species with historic occurrence records in the Armuchee Creek watershed, and therefore, potential to occur in Heath Creek (Table 2).

Table 2 Rare, Threatened, and Endangered Freshwater Mollusk Species with Known Records of Occurrence in Floyd County

Scientific Name	Common Name	Federal Status ^a	Georgia Status ^b
Mussels:			
Elliptio arca	Alabama spike		E
Hamiota altilis	Finelined pocketbook	LT	Т
Medionidus acutissimus	Alabama moccasinshell	LT	E
Medionidus parvulus	Coosa moccasinshell	LE	E
Pleurobema decisum	Southern clubshell	LE	E
Pleurobema georgianum	Southern pigtoe	LE	E
Ptychobranchus foremanianus	Rayed kidneyshell	LE	E
Ptychobranchus greenii	Triangular kidneyshell	LE	
Villosa umbrans	Coosa creekshell	UR	R
Snails:			
Leptoxis foremani	Interrupted rocksnail	LE	E
Pleurocera showalteri	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

The survey will be conducted by a team of biologists experienced in the collection of freshwater mussels and snails led by a malacologist who brings extensive knowledge of the mollusk fauna of the Coosa River basin in Georgia, under the authority of scientific collecting permits issued by GDNR and FWS.

^b Georgia state status: E = endangered; T = threatened; R = rare.

The search reach on Heath will extend from the Main Dam downstream approximately 5 stream miles to the confluence with Little Armuchee Creek. Using snorkeling gear, surveyors will begin at the downstream end of the reach and work upstream bank to bank. All live mussels and snails will be identified to species and returned to the substrate where they were found. Substrate characteristics along the study reach will be documented. All mussels will be measured to the nearest millimeter (long axis). The survey will take place in June-September 2022.

At least one voucher specimen of each mussel species found fresh dead will be retained and deposited at a regional malacological collection. Live mussels will be photographed and returned to the river bottom where they were found. FWS and GDNR will be notified within 24 hours if a federally protected species is found in the survey area.

Reporting

An Aquatic Resources Study Report will be prepared that characterizes aquatic resources present in Heath Creek downstream of the Project. A separate freshwater mussel survey report will be appended to the study report, and the mussel survey findings will be summarized in the main study report. The fish and mussel survey results will be presented in tables and figures, as appropriate, and analyzed with respect to species occurrence, species richness, relative abundance, biotic integrity, and other community attributes. The study results will be used in the DLA to analyze the effects of continued project operation on aquatic resources downstream of the Project.

3.4 Schedule

The Aquatic Resources Study will be completed according to the milestones in Table 3.

Table 3 Schedule for Aquatic Resources Study

Activity	Date or Deadline
Conduct fish community survey	June-September 2022
Conduct mussel survey	June-September 2022
Prepare study report	February 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.5 References

GDNR (Georgia Department of Natural Resources). 2020a. Part I: Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Stream in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

GDNR (Georgia Department of Natural Resources). 2020b. Part IV: Scoring Criteria for the Index of Biotic Integrity to Monitor Fish Communities in Wadeable Stream in the Coosa and Tennessee Drainage Basin of the Ridge and Valley Ecoregion in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

4.0 TERRESTRIAL AND WETLAND RESOURCES SURVEY

OPC will conduct a study to characterize existing terrestrial wildlife and botanical resources and wetlands and riparian resources at the Rocky Mountain Project through a field reconnaissance survey and the use of existing information and data. This study plan combines wildlife and botanical resources as described in Section 4.5 of the PAD; wetlands, riparian, and littoral habitat as described in Section 4.6 of the PAD; and RTE terrestrial plants and wildlife as described in Section 4.7 of the PAD into a single consolidated survey effort.

4.1 Objectives

The specific objectives of this study are to:

- Describe terrestrial wildlife and botanical resources occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Describe floodplain, wetlands, and riparian habitats occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Prepare a map of the principal vegetation community types in the project boundary, including wetlands.
- Identify potentially suitable habitat for RTE species of plants and animals in the project boundary.
- Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and terrestrial RTE species of plants and wildlife in the license application.

4.2 Study Area

The study area includes the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

4.3 Methodology

OPC's approach to the terrestrial and wetland resources survey consists of the following study elements.

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Review of Existing Information

Descriptions of existing terrestrial and wetland resources in the study area (i.e., wildlife and botanical resources; wetlands, riparian, and littoral habitat; and terrestrial RTE plant and wildlife species) will be based on review of existing information summarized in the PAD, including, but not limited to, the following sources:

- Terrestrial Management Plan for the Rocky Mountain Project (GDNR 2013)
- The Natural Communities of Georgia (Edwards et al. 2013)
- Georgia State Wildlife Action Plan (GDNR 2015)
- GDNR's online Georgia Biodiversity Portal
- USFWS Environmental Conservation Online System
- Field Guide to the Rare Plants of Georgia (Chafin 2007)
- Georgia Exotic Pest Plant Council's list of non-native plants in Georgia
- National Audubon Society's Christmas bird count historical data
- USFWS National Wetlands Inventory (NWI) data
- USGS topography
- Google Earth aerial imagery

Field Reconnaissance Survey

A field reconnaissance survey of the study area, concentrating mainly on uplands and wetlands around the project waters and project recreation areas will be conducted in appropriate seasons to observe representative terrestrial and wetland vegetive communities and associated wildlife habitat. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources in the major vegetative community types identified in the Terrestrial Management Plan for the Project (GDNR 2013), and in fall 2022 and spring 2023 to survey for RTE plant species flowering in those seasons.

Teams of two biologists/ecologists will visually assess upland, wetland, and riparian communities, by boat along the shorelines of the Lower Reservoir and Auxiliary Pools and by pedestrian surveys of project recreation areas and floodplains of Heath Creek and other streams, wetlands, and potentially unique or sensitive habitats. During the survey, vegetation community types encountered will be described and field notes recorded as

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to dominant species, presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation habitat types. Unique habitats, or areas where sensitive species might occur, will be GPS-located. Where encountered, field teams will also identify wildlife species and their spoor (scat, tracks, scents, burrows, etc.).

The RTE species list provided in the PAD will be updated prior to the field survey and utilized as the foundation for visually searching for and identifying potentially suitable habitat for RTE species within the study area. Should RTE species be encountered, species/population information, habitat attributes, GPS location, and other relevant data will be recorded so that findings data can be transmitted to the appropriate agency and documented for the study report. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected will be shared only with the agencies having jurisdiction over the resource and will be filed as privileged (non-public) information.

Reporting

A Terrestrial and Wetland Resources Survey Report will be prepared and provided to stakeholders with the DLA for review and comment. The survey findings will be summarized in tables and figures. The study report will also provide a vegetation community map, including wetlands. The study results will be used in the DLA to analyze the effects of continued project operation and maintenance and project-related recreation on terrestrial and wetland resources and RTE species of plants and wildlife.

4.4 Schedule

The Terrestrial and Wetland Resources Survey will be completed according to the milestones in Table 4.

Table 4 Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline
Conduct field reconneissance surveys	June-September 2022;
Conduct field reconnaissance surveys	April 2023
Prepare study report	August 2023
File study report with DLA for stakeholder review	Estimated February 2024

4.5 References

- Chafin, L.G. 2007. Field Guide to the rare plants of Georgia. State Botanical Garden of Georgia and University of Georgia Press, Athens.
- Edwards, L., J. Ambrose, and L. K. Kirkman. 2013. The natural communities of Georgia. Photographs by Hugh and Carol Nourse. The University of Georgia Press, Athens, Georgia.
- Georgia Department of Natural Resources (GDNR). 2013. Terrestrial Management Plan for Rocky Mountain Hydroelectric Plant and Recreation & Public Fishing Area. Spring 2013.
- Georgia Department of Natural Resources (GDNR). 2015. State Wildlife Action Plan. Wildlife Resources Division. Social Circle, Georgia.

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5.0 RECREATION USE ANALYSIS

OPC will conduct a study characterizing existing recreational use at the Rocky Mountain Project for evaluating the potential effects of continued project operation and maintenance on recreation resources in the license application. This study will be accomplished through the compilation and analysis of abundant existing recreational use information and field activities to inventory and describe existing facilities and survey recreation users at the Project.

5.1 Objectives

The specific objectives of this study are to:

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project.
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application.

5.2 Study Area

The study area includes the Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). The Rocky Mountain PFA contains Auxiliary Pool I (Antioch Lake East and West), Auxiliary Pool II (Heath Lake), and other recreation areas (e.g., hiking and biking trails) within the project boundary. Auxiliary Pools I and II are shown in Figure 1.

5.3 Methodology

A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified.

As recommended by GDNR, OPC will conduct on-site recreation surveys to collect data on public use characteristics and user satisfaction levels. Recreation users at the Project

June 2022 Project Control No. 0498003.01 will be surveyed on 15 days between June 2022 and May 2023¹. The purpose of these onsite surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities; annual recreation use will be estimated using GDNR traffic count data, as described below. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays), with an emphasis towards non-peak weekends, using the survey form developed in consultation with GDNR (Figure 4). A general schedule is provided in Table 5. A twoperson field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

Table 5 **General Survey Schedule**

Survey #	Month, Year	Day Type	Entrances
1	June 2022	Weekend	Main, Beach
2	July 2022	Holiday	Main, Beach, Heath
3	July 2022	Weekday	Main, Beach
4	August 2022	Weekend	Main, Beach, Heath
5	August 2022	Weekday	Main, Beach
6	September 2022	Weekend	Main, Beach, Heath
7	September 2022	Weekday	Main, Beach
8	October 2022	Weekend	Main, Beach, Heath
9	October 2022	Weekend	Main, Beach

¹ During discussions with GDNR on April 22, 2022, GDNR indicated they may be able to provide an intern to conduct additional surveys at the Rocky Mountain PFA. If GDNR is able to employ an intern to conduct surveys, the survey schedule will be revised.

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Survey #	Month, Year	Day Type	Entrances
10	March 2023	Weekend	Main, Beach, Heath
11	March 2023	Weekday	Main, Beach
12	April 2023	Weekend	Main, Beach, Heath
13	April 2023	Weekend	Main, Beach
14	May 2023	Weekday	Main, Beach, Heath
15	May 2023	Weekend	Main, Beach

OPC's recreation survey methodology and level of effort are similar to those used by GDNR in a 2006-2007 recreation survey of the Rocky Mountain PFA, and they are consistent with generally accepted practice in relicensing recreation studies. As such, the recreation survey is expected to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the PFA facilities, and for comparison with the 2006-2007 survey results.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GDNR (Figure 5).

Current recreational use will be determined using existing data and information collected by GDNR, including attendance records, traffic count data, and staff observations; these sources of data were used to develop the 2015 Form 80 recreation report filed with FERC. It is OPC's understanding that GDNR continuously collects traffic count data using counter devices installed at the three Rocky Mountain PFA entrances. OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022 for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days." FERC defines a recreation day as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

Estimated projections of future recreation use at the Project will be developed using the average annual increase in population growth over the past 10 years for Floyd County, Georgia, as reported by the U.S. Census Bureau. The increase in population will be applied to the annual use estimates for the Project to determine a future recreation use estimate. This information will be considered when determining future recreation needs at the Project.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GDNR.

A Recreational Use Analysis Report will be prepared and provided to stakeholders with the DLA for review and comment. The study report will characterize existing recreation use and evaluate the need for recreational access or facility improvements.

5.4 Schedule

The Recreational Use Analysis will be completed according to the milestones in Table 6.

Table 6 Schedule for Recreational Use Analysis

Activity	Date or Deadline
Conduct surveys	June-October 2022, March- May 2023
Analyze data	June-July 2023
Prepare study report	September 2023
File study report with DLA for stakeholder review	Estimated February 2024

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Mai	n Beach	_ Heath	Da	te:			Time:	1	
Interviewer:									
Vehicle Type: Vehicle w/ Trailer Vehicle w/o Trailer RV/Camper									
1. What is your county and state of residence? County: State:									
2. How many people are in your vehicle today? people									
3. What is your age?16-2425-3435-4445-5455+									55+
4. If you came with	others, what are the	ir age gro	ups? (check all	that a	apply)			
Children (Infants-12) Youth (13-17) Adults (18-55) Senior Adults (over 55)									
5. How did you hear									
Friend/Relativ	e	Social M	edia						_Other
6. How many times	(including today), ha	ave you vis	sited I	Rocky Mt	n PFA	in the la	ast 30 c	lays?	
7. What is the prima	ry reason for your v	isit today	? (che	ck all tha	t appl	y)		,	
Boat Fishing	Picnicking		Hi	king		\	Can	oeing/kaya	aking
Bank Fishing	Swimming		Bil	king			Wild	dlife viewir	ng
Camping	Hunting	_	Ple	easure Bo	ating		Sho	reline rela	kation
Other:									
8. If you came to fish today, how would you rate your fishing experience?									
Very Good (5)	Good (4)	Fair	(3)		Pc	or (2)		Very l	Poor (1)
9. If you came to fis	h today, where did y	ou fish? (d	check	all that a	pply)				
Antioch Lake EastAntioch Lake West Heath Lake									
10. If you came to hunt today, how would you rate your hunting experience?									
Very Good (5)	Good (4)	Fair				or (2)			Poor (1)
11. Please rate the o		g facilities	at thi	is access a	area.	(choose	one fo	r each)	
Parking:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Boat Ramp:	Very Good (5)	Good		Fair	(3)	Poo	or (2)	Very	Poor (1)
Docks:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Restrooms:	Very Good (5)	Good	d (4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Beach:	Very Good (5)	Good	(4)	Fair	(3)	Poc	or (2)	Very	Poor (1)
Picnic Areas:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Campsites:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Trails:	Very Good (5)	Good	(4)	Fair	(3)	Pod	or (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Good		Fair	(3)	Poc	or (2)		Poor (1)
12. What type of visitation permit do you have? (check all that apply)									
Daily Daily Daily Daily									
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other									
comments or suggestions.									
11 11 38 5									

Figure 4 Recreation Survey Form

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:				ne:					
1. What is your county and state of residence?			County:			State:			
2. How many people are staying in your campsite tonight? people									
3. What is your age	?	_18-24		_25-34	35	5-44		45-54	55+
4. If you came with others, what are their age groups? (check all that apply)									
Children (Infan	its-12)Yout	h (13-17)	Adults (18-55)Senior Adults (over 55)						
5. How would you r	rate the online boo	king experi	enc	e for camp	ing rese	rvatio	ons?		
Very Good (5)	Good (4)	Fair	<u> </u>					Very Poor (1)	
6. What activities a	re you participatin	g in while c	amp	oing? (chec	k all tha	t app	ly)		
Boat Fishing	Picnicking			_Hiking			Canoeing/kayaking		
Bank Fishing	Swimming			_Biking				Vildlife Vi	
Hunting	Pleasure Boat	ing		_Shoreline	relaxati	on		Other (list	below):
7. While camping a	t Rocky Mountain	PFA, are yo	u sta						
Tent	RV			Tent/RV				Group Ca	ımp
8. If you came to fis			_	r fishing ex	•				
Very Good (5)	Good (4)	Fair	` '		Poor (:			Very	Poor (1)
9. If you came to hu				ur hunting					
	Very Good (5) Good (4) Fair (3) Poor (2) Very Poor (1)					• •			
10. Please rate the									
Campsite:	Very Good (5)	Good	•	Fair (3		Poor	<u> </u>		Poor (1)
Playground:	Very Good (5)	Good	• •	Fair (3		Poor	<u> </u>		Poor (1)
Restrooms:	Very Good (5)	Good		Fair (3		Poor			Poor (1)
Cleanliness:	Very Good (5)	Good	(4)	4)Fair (3)Poor		(2)	Very	Poor (1)	
Bank Fishing:	Very Good (5)	Good	(4)	Fair (3	3)	Poor	· (2)	Very	Poor (1)
11. What type of visitation permit do you have? (check all that apply)									
Daily	Annual		_	Campgro	und			lone	
12. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and									
any other comments or suggestions.									

Figure 5 Campground User Survey Form



From: Jones, Craig
To: Bauer, Eric F

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: Draft WQ Assessment for RM Relicensing Date: Wednesday, July 20, 2022 2:11:25 PM

Attachments: <u>image003.pnq</u>

Rocky Mountain Draft Study Plans 07-14-2022 FWS.pdf

Eric,

As discussed, here is the most recent version of the WQ draft study plan.

Best,

cj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

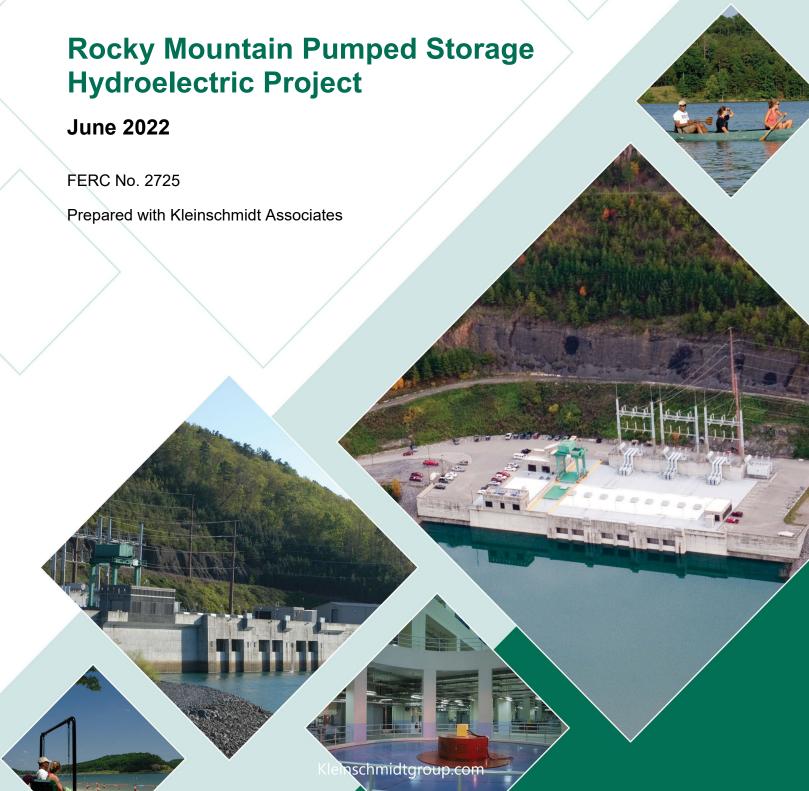


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June 2022 iii

1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

June 2022 Project Control No. 0498003.01

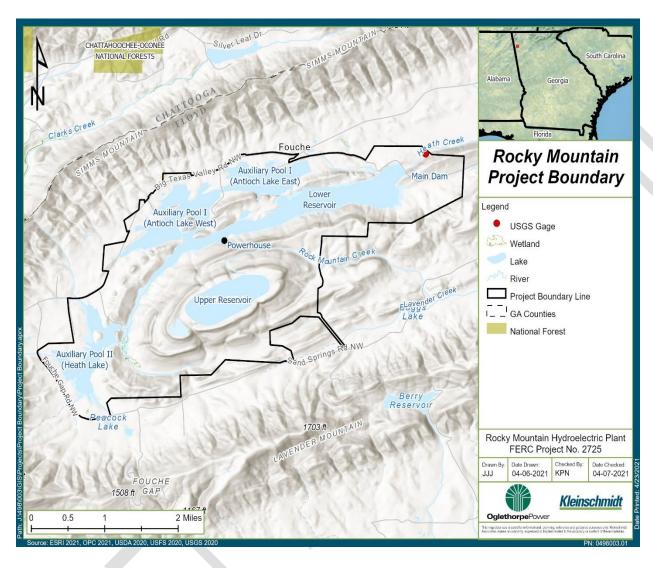


Figure 1 Project Boundary Map

2.0 WATER QUALITIY ASSESSMENT

OPC will conduct a study characterizing existing water quality at the Rocky Mountain Project. The study will supplement the existing robust water quality data set available for the Project, as summarized in the PAD, and will be accomplished through a combination of new water quality monitoring at representative locations within the project boundary and compilation and analysis of existing water quality data.

2.1 Objectives

The specific objectives of this study are to:

- Characterize existing water quality in the Rocky Mountain study area.
- Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application.

2.2 Study Area

The study area includes the Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary.

2.3 Methodology

OPC's approach to the water quality assessment consists of the following study elements:

- Compile and analyze water quality data collected by OPC and GDNR at the Project between 1996 and 2020.
- Conduct one year of monthly water quality monitoring at four historic stations within the project boundary to characterize current conditions.

Monthly water quality monitoring will be conducted from June 2022 through May 2023 at historic stations RM11 (Heath Creek downstream of Main Dam), RM13 (Heath Lake), RM15 (Antioch Lake East), and RM16 (Lower Reservoir near the Main Dam) (Figure 2). The Upper Reservoir is not included in monitoring because it exchanges a large volume of water daily with the Lower Reservoir, both reservoirs fluctuate substantially and remain well mixed throughout the water column, and Lower Reservoir water quality is therefore also representative of Upper Reservoir water quality. Rock Mountain Creek is not included

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in monitoring because there is no outlet from the Upper Reservoir to the creek and previous water quality sampling in Rock Mountain Creek has indicated that water quality of the creek is unaffected by project operation.



Blue circles indicate station numbers RM11, RM13, RM15, and RM16.

Figure 2 Proposed Water Quality Monitoring Stations in 2022-2023

Monthly water quality monitoring will include *in-situ* measurements of water temperature, dissolved oxygen (DO) concentration, pH, specific conductance, and turbidity using an electronic multi-parameter water quality measurement sonde. Measurements will be taken at a depth of 1 meter (m) at the impoundment stations (RM13, RM15, and RM16) and at mid-depth in Heath Creek (RM11). The water quality measurement sonde will be calibrated prior to each monitoring event.

During each monthly event, grab samples of water also will be collected at 1-m depth at the impoundment stations and at mid-depth in Heath Creek and analyzed in the laboratory for 5-day biological oxygen demand, ammonia, inorganic nitrogen (nitratenitrite), total Kjeldahl nitrogen, ortho-phosphate, and total phosphorus.

For the Heath Creek monitoring location, to be responsive to FWS's request for continuous monitoring and address GDNR's comment about minimizing the effects of temporal variation of monthly water quality data collection, OPC will conduct continuous

monitoring of DO concentration and water temperature in Heath Creek downstream of the Main Dam (RM11) for one year beginning in June 2022. A dissolved oxygen data logger will be placed in the stream within the direct influence of releases from the Main Dam and where the channel cross section is relatively uniform in depth and the water well mixed. Placement of the data logger will be determined in consultation with GDNR and based on field measurements of DO within the reach between the Main Dam and USGS gage during the initial water quality monitoring event. The data logger will record DO and water temperature every hour and will be downloaded and maintained monthly throughout the monitoring period.

A Water Quality Assessment Report will be prepared and provided to stakeholders with the Draft License Application (DLA) for review and comment. The monitoring results and historic water quality data will be summarized in tables and figures and analyzed with respect to applicable state water quality criteria and any evident water quality trends related to project operations and maintenance or project-related recreation.

Additionally, OPC will evaluate the results of the Water Quality Assessment in conjunction with the results of the fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GDNR and FWS to determine whether a second year of water quality monitoring is warranted.

2.4 Schedule

The Water Quality Assessment study will be completed according to the milestones in Table 1.

Table 1 Schedule for Water Quality Assessment

Activity	Date or Deadline
Begin data compilation and monthly sampling	June 2022
Complete one year of monthly sampling	May 2023
Prepare study report	December 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.0 AQUATIC RESOURCES STUDY

OPC will conduct a study characterizing the existing communities of fish and mussels in Heath Creek downstream of the Project for evaluating the effects of continued project operation on aquatic habitat downstream. The study will be accomplished through a fish community survey and a freshwater mussel survey, to be conducted in 2022.

3.1 Objectives

The specific objectives of this study are to:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project.
- Develop aquatic resources information sufficient for analyzing the effects of continued project operation on aquatic habitat downstream of the project in the license application, including assessing the presence/absence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails.

3.2 Study Area

The study area includes Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek, a reach of approximately 5 miles (Figure 3).

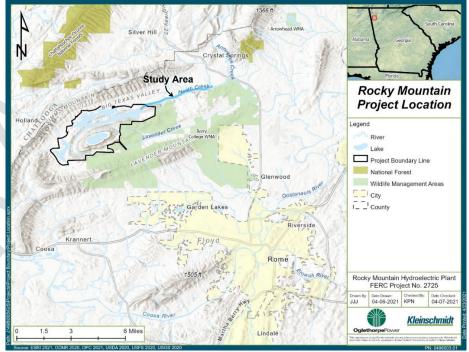


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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3.3 Methodology

OPC's approach to the aquatic resources study includes the following key elements.

Fish Community Survey

Consistent with GDNR recommendations fish community sampling will be conducted at two representative locations on Heath Creek in 2022, including a station near the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) within the project boundary and a station previously surveyed by the GDNR Stream Team in 2001-2002 located about 2.5 miles downstream of the Main Dam at Texas Valley Road. Each station will be surveyed once during the period June-September 2022 following the GDNR's Standard Operating Procedures (SOP) for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GDNR 2020a).

Prior to sampling, reconnaissance and stream measurements will take place at each sampling to station calculate mean stream width (MSW). Reach of stream to be sampled will be 35 times the MSW. Additionally, MSW will be used to determine the number of backpack electrofishing units (BPEFs) and netters required to efficiently sample the area in accordance with the referenced SOP.

The fisheries sampling will take place in an upstream direction starting at the downstream end of the sampling reach. Collected fish will be identified to species, enumerated, weighed, and returned to the stream. The fish community data will be analyzed using the multi-metric Index of Biotic Integrity (IBI) to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion (GDNR 2020b). The IBI integrates characteristics of the fish community, population, and individuals to assess fish health and biologic integrity. Metrics are based on species richness, evenness, feeding guilds, habitat use, species sensitivity or tolerance to pollutants. Total IBI scores will fall within one of five integrity classes (excellent, good, fair, poor, or very poor) and will be compared to the IBI scores obtained by the GDNR Stream Team for Heath Creek in 2001-2002.

Freshwater Mussel Survey

A survey for mussels and aquatic snails will be conducted in representative habitats in Heath Creek in 2022 to characterize the occurrence, distribution, relative abundance, and species richness of the native freshwater mollusk community. The survey will include habitats with potential to support RTE species of mussels and snails (mollusks). Based on known element of occurrence records (historic or present) and species range and habitat data, ten state and/or federally protected mollusk species, and one mussel species under federal review for listing, potentially occur in the project vicinity, including several species with historic occurrence records in the Armuchee Creek watershed, and therefore, potential to occur in Heath Creek (Table 2).

Table 2 Rare, Threatened, and Endangered Freshwater Mollusk Species with Known Records of Occurrence in Floyd County

Scientific Name	Common Name	Federal Status ^a	Georgia Status ^b
Mussels:			
Elliptio arca	Alabama spike		E
Hamiota altilis	Finelined pocketbook	LT	Т
Medionidus acutissimus	Alabama moccasinshell	LT	E
Medionidus parvulus	Coosa moccasinshell	LE	E
Pleurobema decisum	Southern clubshell	LE	E
Pleurobema georgianum	Southern pigtoe	LE	E
Ptychobranchus foremanianus	Rayed kidneyshell	LE	E
Ptychobranchus greenii	Triangular kidneyshell	LE	
Villosa umbrans	Coosa creekshell	UR	R
Snails:			
Leptoxis foremani	Interrupted rocksnail	LE	E
Pleurocera showalteri	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

The survey will be conducted by a team of biologists experienced in the collection of freshwater mussels and snails led by a malacologist who brings extensive knowledge of the mollusk fauna of the Coosa River basin in Georgia, under the authority of scientific collecting permits issued by GDNR and FWS.

^b Georgia state status: E = endangered; T = threatened; R = rare.

The search reach on Heath will extend from the Main Dam downstream approximately 5 stream miles to the confluence with Little Armuchee Creek. Using snorkeling gear, surveyors will begin at the downstream end of the reach and work upstream bank to bank. All live mussels and snails will be identified to species and returned to the substrate where they were found. Substrate characteristics along the study reach will be documented. All mussels will be measured to the nearest millimeter (long axis). The survey will take place in June-September 2022.

At least one voucher specimen of each mussel species found fresh dead will be retained and deposited at a regional malacological collection. Live mussels will be photographed and returned to the river bottom where they were found. FWS and GDNR will be notified within 24 hours if a federally protected species is found in the survey area.

Reporting

An Aquatic Resources Study Report will be prepared that characterizes aquatic resources present in Heath Creek downstream of the Project. A separate freshwater mussel survey report will be appended to the study report, and the mussel survey findings will be summarized in the main study report. The fish and mussel survey results will be presented in tables and figures, as appropriate, and analyzed with respect to species occurrence, species richness, relative abundance, biotic integrity, and other community attributes. The study results will be used in the DLA to analyze the effects of continued project operation on aquatic resources downstream of the Project.

3.4 Schedule

The Aquatic Resources Study will be completed according to the milestones in Table 3.

Table 3 Schedule for Aquatic Resources Study

Activity	Date or Deadline
Conduct fish community survey	June-September 2022
Conduct mussel survey	June-September 2022
Prepare study report	February 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.5 References

GDNR (Georgia Department of Natural Resources). 2020a. Part I: Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Stream in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

GDNR (Georgia Department of Natural Resources). 2020b. Part IV: Scoring Criteria for the Index of Biotic Integrity to Monitor Fish Communities in Wadeable Stream in the Coosa and Tennessee Drainage Basin of the Ridge and Valley Ecoregion in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

4.0 TERRESTRIAL AND WETLAND RESOURCES SURVEY

OPC will conduct a study to characterize existing terrestrial wildlife and botanical resources and wetlands and riparian resources at the Rocky Mountain Project through a field reconnaissance survey and the use of existing information and data. This study plan combines wildlife and botanical resources as described in Section 4.5 of the PAD; wetlands, riparian, and littoral habitat as described in Section 4.6 of the PAD; and RTE terrestrial plants and wildlife as described in Section 4.7 of the PAD into a single consolidated survey effort.

4.1 Objectives

The specific objectives of this study are to:

- Describe terrestrial wildlife and botanical resources occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Describe floodplain, wetlands, and riparian habitats occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Prepare a map of the principal vegetation community types in the project boundary, including wetlands.
- Identify potentially suitable habitat for RTE species of plants and animals in the project boundary.
- Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and terrestrial RTE species of plants and wildlife in the license application.

4.2 Study Area

The study area includes the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

4.3 Methodology

OPC's approach to the terrestrial and wetland resources survey consists of the following study elements.

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Review of Existing Information

Descriptions of existing terrestrial and wetland resources in the study area (i.e., wildlife and botanical resources; wetlands, riparian, and littoral habitat; and terrestrial RTE plant and wildlife species) will be based on review of existing information summarized in the PAD, including, but not limited to, the following sources:

- Terrestrial Management Plan for the Rocky Mountain Project (GDNR 2013)
- The Natural Communities of Georgia (Edwards et al. 2013)
- Georgia State Wildlife Action Plan (GDNR 2015)
- GDNR's online Georgia Biodiversity Portal
- USFWS Environmental Conservation Online System
- Field Guide to the Rare Plants of Georgia (Chafin 2007)
- Georgia Exotic Pest Plant Council's list of non-native plants in Georgia
- National Audubon Society's Christmas bird count historical data
- USFWS National Wetlands Inventory (NWI) data
- USGS topography
- Google Earth aerial imagery

Field Reconnaissance Survey

A field reconnaissance survey of the study area, concentrating mainly on uplands and wetlands around the project waters and project recreation areas will be conducted in appropriate seasons to observe representative terrestrial and wetland vegetive communities and associated wildlife habitat. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources in the major vegetative community types identified in the Terrestrial Management Plan for the Project (GDNR 2013), and in fall 2022 and spring 2023 to survey for RTE plant species flowering in those seasons.

Teams of two biologists/ecologists will visually assess upland, wetland, and riparian communities, by boat along the shorelines of the Lower Reservoir and Auxiliary Pools and by pedestrian surveys of project recreation areas and floodplains of Heath Creek and other streams, wetlands, and potentially unique or sensitive habitats. During the survey, vegetation community types encountered will be described and field notes recorded as

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to dominant species, presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation habitat types. Unique habitats, or areas where sensitive species might occur, will be GPS-located. Where encountered, field teams will also identify wildlife species and their spoor (scat, tracks, scents, burrows, etc.).

The RTE species list provided in the PAD will be updated prior to the field survey and utilized as the foundation for visually searching for and identifying potentially suitable habitat for RTE species within the study area. Should RTE species be encountered, species/population information, habitat attributes, GPS location, and other relevant data will be recorded so that findings data can be transmitted to the appropriate agency and documented for the study report. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected will be shared only with the agencies having jurisdiction over the resource and will be filed as privileged (non-public) information.

Reporting

A Terrestrial and Wetland Resources Survey Report will be prepared and provided to stakeholders with the DLA for review and comment. The survey findings will be summarized in tables and figures. The study report will also provide a vegetation community map, including wetlands. The study results will be used in the DLA to analyze the effects of continued project operation and maintenance and project-related recreation on terrestrial and wetland resources and RTE species of plants and wildlife.

4.4 Schedule

The Terrestrial and Wetland Resources Survey will be completed according to the milestones in Table 4.

Table 4 Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline
Conduct field reconneissance surveys	June-September 2022;
Conduct field reconnaissance surveys	April 2023
Prepare study report	August 2023
File study report with DLA for stakeholder review	Estimated February 2024

4.5 References

- Chafin, L.G. 2007. Field Guide to the rare plants of Georgia. State Botanical Garden of Georgia and University of Georgia Press, Athens.
- Edwards, L., J. Ambrose, and L. K. Kirkman. 2013. The natural communities of Georgia. Photographs by Hugh and Carol Nourse. The University of Georgia Press, Athens, Georgia.
- Georgia Department of Natural Resources (GDNR). 2013. Terrestrial Management Plan for Rocky Mountain Hydroelectric Plant and Recreation & Public Fishing Area. Spring 2013.
- Georgia Department of Natural Resources (GDNR). 2015. State Wildlife Action Plan. Wildlife Resources Division. Social Circle, Georgia.

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5.0 RECREATION USE ANALYSIS

OPC will conduct a study characterizing existing recreational use at the Rocky Mountain Project for evaluating the potential effects of continued project operation and maintenance on recreation resources in the license application. This study will be accomplished through the compilation and analysis of abundant existing recreational use information and field activities to inventory and describe existing facilities and survey recreation users at the Project.

5.1 Objectives

The specific objectives of this study are to:

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project.
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application.

5.2 Study Area

The study area includes the Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). The Rocky Mountain PFA contains Auxiliary Pool I (Antioch Lake East and West), Auxiliary Pool II (Heath Lake), and other recreation areas (e.g., hiking and biking trails) within the project boundary. Auxiliary Pools I and II are shown in Figure 1.

5.3 Methodology

A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified.

As recommended by GDNR, OPC will conduct on-site recreation surveys to collect data on public use characteristics and user satisfaction levels. Recreation users at the Project

June 2022 Project Control No. 0498003.01 will be surveyed on 15 days between June 2022 and May 2023¹. The purpose of these onsite surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities; annual recreation use will be estimated using GDNR traffic count data, as described below. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays), with an emphasis towards non-peak weekends, using the survey form developed in consultation with GDNR (Figure 4). A general schedule is provided in Table 5. A twoperson field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

Table 5 **General Survey Schedule**

Survey #	Month, Year	Day Type	Entrances
1	June 2022	Weekend	Main, Beach
2	July 2022	Holiday	Main, Beach, Heath
3	July 2022	Weekday	Main, Beach
4	August 2022	Weekend	Main, Beach, Heath
5	August 2022	Weekday	Main, Beach
6	September 2022	Weekend	Main, Beach, Heath
7	September 2022	Weekday	Main, Beach
8	October 2022	Weekend	Main, Beach, Heath
9	October 2022	Weekend	Main, Beach

¹ During discussions with GDNR on April 22, 2022, GDNR indicated they may be able to provide an intern to conduct additional surveys at the Rocky Mountain PFA. If GDNR is able to employ an intern to conduct surveys, the survey schedule will be revised.

5-2

Project Control No. 0498003.01

Survey #	Month, Year	Day Type	Entrances
10	March 2023	Weekend	Main, Beach, Heath
11	March 2023	Weekday	Main, Beach
12	April 2023	Weekend	Main, Beach, Heath
13	April 2023	Weekend	Main, Beach
14	May 2023	Weekday	Main, Beach, Heath
15	May 2023	Weekend	Main, Beach

OPC's recreation survey methodology and level of effort are similar to those used by GDNR in a 2006-2007 recreation survey of the Rocky Mountain PFA, and they are consistent with generally accepted practice in relicensing recreation studies. As such, the recreation survey is expected to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the PFA facilities, and for comparison with the 2006-2007 survey results.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GDNR (Figure 5).

Current recreational use will be determined using existing data and information collected by GDNR, including attendance records, traffic count data, and staff observations; these sources of data were used to develop the 2015 Form 80 recreation report filed with FERC. It is OPC's understanding that GDNR continuously collects traffic count data using counter devices installed at the three Rocky Mountain PFA entrances. OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022 for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days." FERC defines a recreation day as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

Estimated projections of future recreation use at the Project will be developed using the average annual increase in population growth over the past 10 years for Floyd County, Georgia, as reported by the U.S. Census Bureau. The increase in population will be applied to the annual use estimates for the Project to determine a future recreation use estimate. This information will be considered when determining future recreation needs at the Project.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GDNR.

A Recreational Use Analysis Report will be prepared and provided to stakeholders with the DLA for review and comment. The study report will characterize existing recreation use and evaluate the need for recreational access or facility improvements.

5.4 Schedule

The Recreational Use Analysis will be completed according to the milestones in Table 6.

Table 6 Schedule for Recreational Use Analysis

Activity	Date or Deadline
Conduct surveys	June-October 2022, March- May 2023
Analyze data	June-July 2023
Prepare study report	September 2023
File study report with DLA for stakeholder review	Estimated February 2024

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Mai	n Beach	_ Heath	Da	te:			Time:	1	
Interviewer:									
Vehicle Type: Vehicle w/ Trailer Vehicle w/o Trailer RV/Camper									
1. What is your cour	nty and state of resid	dence?	Co	unty:			Sta	ate:	
2. How many people	e are in your vehicle	today?		_ people					
3. What is your age?	·	_16-24		_25-34		35-44		_45-54	55+
4. If you came with	4. If you came with others, what are their age groups? (check all that apply)								
Children (Infant	Children (Infants-12)Youth (13-17)Adults (18-55)Senior Adults (over 55)								
5. How did you hear									
Friend/Relativ	e	Social M	edia						_Other
6. How many times	(including today), ha	ave you vis	sited I	Rocky Mt	n PFA	in the la	ast 30 c	lays?	
7. What is the prima	ry reason for your v	isit today	? (che	ck all tha	t appl	y)		,	
Boat Fishing	Picnicking		Hi	king		\	Can	oeing/kaya	aking
Bank Fishing	Swimming		Bil	king			Wild	dlife viewir	ıg
Camping	Hunting	_	Ple	easure Bo	ating		Sho	reline rela	kation
Other:									
8. If you came to fis	h today, how would	you rate y	our fi	shing exp	erien	ice?			
Very Good (5)	Good (4)	Fair	(3)		Pc	or (2)		Very l	Poor (1)
9. If you came to fis	h today, where did y	ou fish? (d	check	all that a	pply)				
Antioch Lake		Antioch	_				Heath	Lake	
10. If you came to h	unt today, how wou		_	r hunting					
Very Good (5)	Good (4)	Fair				or (2)			Poor (1)
11. Please rate the o		g facilities	at thi	is access a	area.	(choose	one fo	r each)	
Parking:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Boat Ramp:	Very Good (5)	Good		Fair	(3)	Poo	or (2)	Very	Poor (1)
Docks:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Restrooms:	Very Good (5)	Good	d (4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Beach:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Picnic Areas:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Campsites:	Very Good (5)	Good	(4)	Fair	(3)	Poo	or (2)	Very	Poor (1)
Trails:	Very Good (5)	Good		Fair		Pod	or (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Good		Fair	(3)	Pod	or (2)		Poor (1)
12. What type of visitation permit do you have? (check all that apply)									
Daily Daily Daily Daily									
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other									
comments or suggestions.									

Figure 4 Recreation Survey Form

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:			Tin	ne:						
1. What is your county and state of residence?				unty:			Stat	:e:		
2. How many people are staying in your campsite tonight?						ple				
3. What is your age?18-24				_25-34	35	5-44		45-54	55+	
4. If you came with	others, what are t	heir age gro	oups	? (check al	l that ap	ply)				
Children (Infants-12) Youth (13-17) Adults (18-55) Senior Adults ((over 55)					
5. How would you rate the online booking experience for camping reservations?										
Very Good (5)	Good (4)	Fair	<u> </u>		Poor (-		Very	Poor (1)	
6. What activities a	re you participatin	g in while c	amp	oing? (chec	k all tha	t app	ly)			
Boat Fishing	Picnicking			_Hiking				Canoeing/		
Bank Fishing	Swimming			_Biking				Vildlife Vi		
Hunting	Pleasure Boat	ing		_Shoreline	relaxati	on		Other (list	below):	
7. While camping a	t Rocky Mountain	PFA, are yo	u sta							
Tent	RV		_	Tent/RV				Group Camp		
8. If you came to fis			_	r fishing ex	•					
	Very Good (5) Good (4) Fair (3) Poor (2) Very Poor (1)					Poor (1)				
9. If you came to hu				ur hunting						
Very Good (5)	Good (4)	Fair	<u> </u>		Poor (:				Poor (1)	
10. Please rate the										
Campsite:	Very Good (5)	Good		Fair (3		Poor	<u> </u>		Poor (1)	
Playground:	Very Good (5)	Good	• •	Fair (3		Poor	<u> </u>		Poor (1)	
Restrooms:	Very Good (5)	Good		Fair (3		Poor			Poor (1)	
Cleanliness:	Very Good (5)	Good	(4)	Fair (3	3)	Poor	(2)	Very	Poor (1)	
Bank Fishing:	Very Good (5)	Good	(4)	Fair (3	3)	Poor	· (2)	Very	Poor (1)	
11. What type of vi	sitation permit do	you have? (che	ck all that	apply)					
Daily	Annual		_	Campgro	und			lone		
12. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and										
any other comments or suggestions.										

Figure 5 Campground User Survey Form

Meeting Summary Rocky Mountain Relicensing Studies Update

Date and Time: Wednesday, July 20, 2022, 2:00 pm

Location: Virtual Meeting (Webex)

Participants:

Eric Bauer, U.S. Fish and Wildlife Service (USFWS) Craig Jones, Oglethorpe Power Corporation (OPC) Tyler McCaslin, OPC Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an update on the Water Quality Assessment, Aquatic Resources, and Terrestrial and Wetlands Resources study plans. Discussions included OPC' proposed water quality monitoring plan and reassessing any need for additional monitoring after one year; identifying potentially suitable spring-fed stream habitats for the Cherokee Clubtail, a dragonfly species currently under review for federal listing, as part of the terrestrial and wetlands field surveys; and it being potentially beneficial to conduct a targeted survey for the Trispot Darter, a federally threatened species, in the small tributary system that enters Heath Creek below the Main Dam and just upstream of the U.S. Geological Survey gage. USFWS also suggested that the national Bald Eagle management guidelines be included in the license application. OPC will be emailing USFWS the draft study plans for review and comment.

From: Jones, Craig
To: Bauer, Eric F

Cc: McCaslin, Tyler; Steven Layman

Subject: RE: [EXTERNAL] Draft WQ Assessment for RM Relicensing

Date: Thursday, July 21, 2022 10:56:26 AM

Attachments: image001.png

image002.png

Hi Eric.

Thanks so much for the quick turnaround on your review and comments, and I'm happy to hear we were able to help fill your "awkward" time! We'll review your comments and let you know if we have any questions or need to follow up.

Best.

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Bauer, Eric F [mailto:eric_bauer@fws.gov]

Sent: Thursday, July 21, 2022 9:02 AM **To:** Jones, Craig <craig.jones@opc.com>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Re: [EXTERNAL] Draft WQ Assessment for RM Relicensing

External E-Mail

Good morning everyone,

I had some awkward time to fill at the end of yesterday and this morning, so I knocked out these study plan reviews. Great job on these study plans. I only had a few minor comments in addition to the feedback I provided yesterday (i.e. potential need to targeted sample for trispot darter during the winter/early spring). I only commented on the file version 07_14_2022 because as far as I could tell it was identical to the June version that you also sent and it included all the resource areas we discussed (Water quality, aquatics - fish and mollusks, and terrestrial/wetlands) but let me know if you expected something different. Thanks for

being so responsive to resource agency feedback. I look forward to seeing the results of these studies.

-Eric

Eric F. Bauer, PhD

(he/him)

Fish and Wildlife Biologist

Georgia Ecological Services

US Fish and Wildlife Service

RG Stephens, Jr. Federal Building

355 East Hancock Avenue, Room 320, Box 7

Athens, GA 30601

Office #: 706-613-9493

Georgia Ecological Services Website: https://www.fws.gov/office/georgia-ecological-services
Project Planning and Review Procedures: https://www.fws.gov/office/georgia-ecological-

services/project-planning-review

Direct Line: 706-208-7519

Teams: eric_bauer@fws.gov (preferred)

From: Jones, Craig < craig.jones@opc.com>
Sent: Wednesday, July 20, 2022 2:11 PM
To: Bauer, Eric F < eric bauer@fws.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: [EXTERNAL] Draft WQ Assessment for RM Relicensing

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Eric,

As discussed, here is the most recent version of the WQ draft study plan.

Best,

Сj

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: Santiago D. Martinez; ER; Ayesha R. Tarek
Cc: McCaslin, Tyler; Steven Layman; Norris, Sean
Subject: RE: Rocky Mountain APE/Cultural Studies
Date: Thursday, July 21, 2022 9:32:02 AM

Attachments: <u>image001.png</u>

image002.png

Hi Santi.

Thanks for the quick response. I will send a Webex invite for 2:00 p.m. next Thursday (7/28).

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

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From: Santiago D. Martinez [mailto:Santiago.Martinez@dca.ga.gov]

Sent: Thursday, July 21, 2022 8:43 AM

To: Jones, Craig <craig.jones@opc.com>; ER <er@dca.ga.gov>; Ayesha R. Tarek

<Ayesha.Tarek@dca.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Re: Rocky Mountain APE/Cultural Studies

External E-Mail

Craig,

Good morning, Ayesha and I both have open availability on Thursday, but unfortunately, Friday will not work for us. Please let us know what works best for y'all and we can go from there.

Best regards,

Santiago Martinez
Environmental Review Historian
Environmental Review & Preservation Planning

Historic Preservation Division/Georgia DCA

(404) 486-6425 | 60 Executive Park South, NE Atlanta, GA 30329



Learn more about our commitment to fair housing.



Santiago D. Martinez

Environmental Review Historian Georgia Department of Community Affairs 60 Executive Park, NE Atlanta, Georgia 30329

Direct 4044866425 Santiago.Martinez@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, July 21, 2022 8:06 AM

To: ER < er@dca.ga.gov>; Ayesha R. Tarek < Ayesha.Tarek@dca.ga.gov>; Santiago D. Martinez

<Santiago.Martinez@dca.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>> **Subject:** Rocky Mountain APE/Cultural Studies

Good Morning,

As we discussed at our last meeting, I'm reaching out to see if we can set up a meeting for either Thursday (7/28) or Friday (7/29) next week to address the APE and study methods. If that works, please let me some times that you're available.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

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From: <u>Jones, Craig</u>

 To:
 ER; Ayesha R. Tarek; Santiago D. Martinez

 Cc:
 McCaslin, Tyler; Norris, Sean; Steven Layman

 Subject:
 Revised Draft Study Plan for Cultural Resources

Date: Tuesday, July 26, 2022 12:03:31 PM

Attachments: <u>image003.png</u>

0498003 Rocky Mountain Proposed Study Plans HPD revised 07-26-2022.docx

Good Morning,

Attached is a revised draft cultural resources study plan. The revised draft clarifies studies that we are proposing, augments information about the existing sites and structures, and includes an improved description of the work and rationale for the methods.

We look forward to our meeting on Thursday to discuss the APE and study plan. Along with the PAD and privileged cultural resources appendix we sent last week, the revised study plan should provide a good basis for a productive meeting. Please reach out with any questions or if you need additional information or clarification on the information provided.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

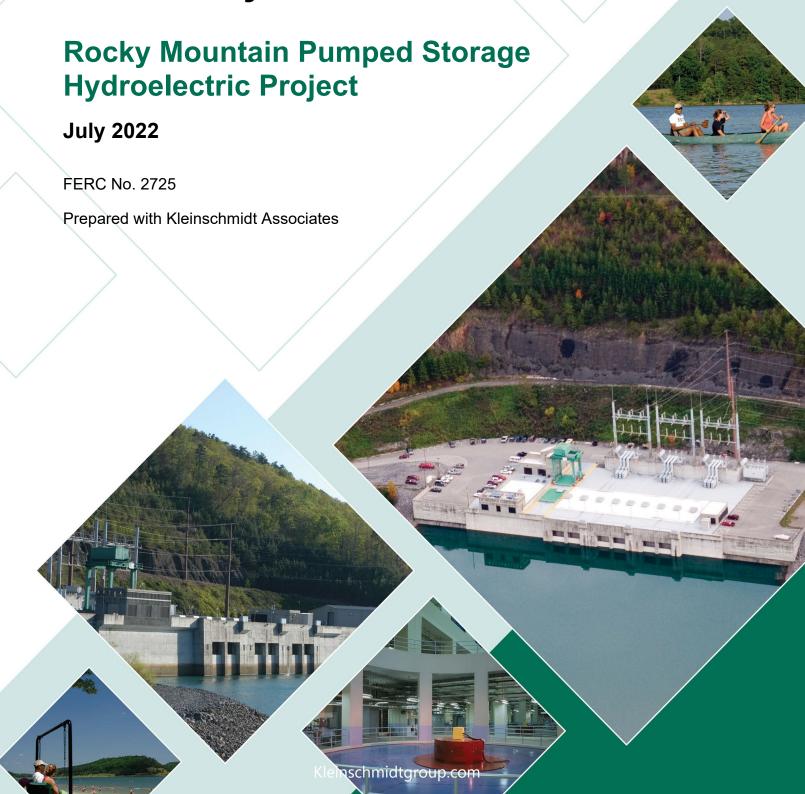


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1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

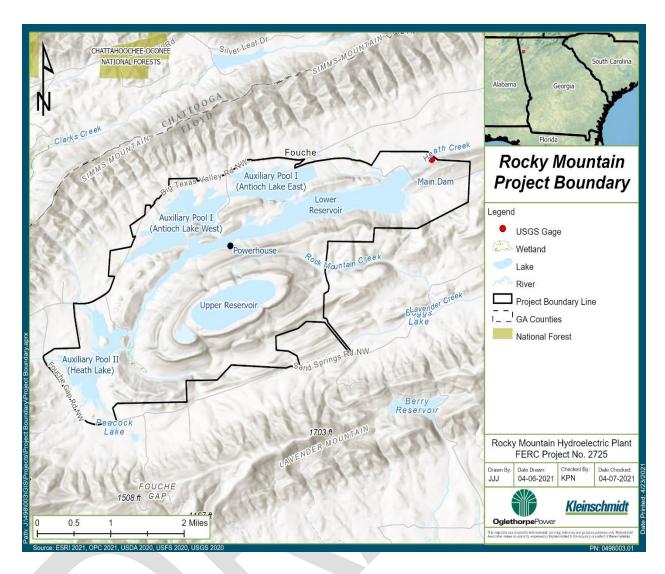


Figure 1 Project Boundary Map

2.0 CULTURAL RESOURCES ASSESSMENT

OPC proposes to conduct a cultural resources assessment of the Rocky Mountain Project to identify and evaluate archaeological and historical resources within the Area of Potential Effect (APE). The study will consist of review of available information on known archaeological and historical sites in the project boundary, including previous extensive cultural resource assessments summarized in the PAD; an archaeological field survey to update/refine site boundaries and to determine the National Register of Historic Places (NRHP) eligibility status of one site, and an architectural field survey to evaluate the NRHP eligibility of project facilities.

2.1 Objectives

The goal of this study is to identify and document historic properties located within the APE that could be affected by continued operation and maintenance of the Project. This information will be used to modify the Project's existing Cultural Resources Management Plan (CRMP) into a new Historic Properties Management Plan (HPMP)

The specific objectives of this study are to:

- Identify and summarize known historic properties at the Project within the APE.
- Conduct an archaeological field survey for a site (GP-FL-14/CRFL 14) specified in the 2020 Cultural Resources Monitoring Report (TRC) provided in the PAD to define the site boundaries and evaluate its NRHP eligibility status.
- Refine the site boundaries and update the site forms for three previously evaluated archaeological sites (9FL80, 9FL138, and 9FL148).
- Conduct an architectural field survey to evaluate the NRHP eligibility status of project facilities, which will turn 50 years of age during the new license term.
- Evaluate the potential for effects on historic resources from continued project operation and maintenance and project-related recreation.

2.2 Study Area

The study area will be the APE, to be identified and delineated in consultation with the Georgia Department of Community Affairs Historic Preservation Division (GHPD), which is Georgia's state historic preservation office (SHPO), and FERC. The APE is expected to

October 2023 Project Control No. 0498003.01 include the FERC project boundary, encompassing the project facilities, Rocky Mountain PFA, and 5,000 acres of land and water.

2.3 Methodology

OPC will contract the services of a professional cultural resources consultant who will use currently accepted practices as defined under Section 106 of the Historic Preservation Act of 1966 (as amended) and implementing regulations (36 CFR 800) for the identification and evaluation of historic properties.

Agency Consultation

OPC will consult with GHPD and FERC to define the project APE and to address overall study goals and methods. OPC will prepare map(s) showing the APE in relation to the project boundary and document GHPD and FERC concurrence with the APE.

Background Literature Research

An archaeological site file and literature review will be conducted at the research and collections facility of the University of Georgia and at Georgia's Archaeological Site File records maintained online on the Georgia Natural, Archaeological, and Historic Geographic Information System (GNAHRGIS). The review will include the *Revised Cultural Resources Management Plan for the Rocky Mountain Project, Floyd County, Georgia* (Garrow and Cleveland 1997), which provides a synthesis of the previous extensive cultural resource assessments completed at the Project and summarized in the PAD, the findings of archaeological monitoring conducted at the Project in 2020 (Appendix F of the PAD, privileged information), and existing reports and documents available from OPC.

Architectural research will also include historical research on the Rocky Mountain Project that places it in the context of large-scale hydroelectric power generation, water control features, and recreation in Georgia and the Southeast United States. Material collected will include secondary histories, primary sources, historic maps, photographs, drawings, and reports related to the planning and construction of the Project, as well as documents related to operation of the facility and management of the resources within the APE. The historical context will be illustrated, fully referenced, and used to evaluate the Project's eligibility for listing in the NRHP.

Archaeological Survey

In November 2020, TRC Environmental Corporation (TRC) conducted archaeological monitoring of six sites previously recommended for preservation and monitoring, with the goal of locating and visually assessing the condition of each site (Table 1). All six sites were located and shown to be well maintained and protected, with no evidence of looting, natural destruction, erosion caused by project operations, or vandalism.

Table 1 Archaeological Properties Recommended in the Rocky Mountain Project Cultural Resources Management Plan for Preservation

Site			
Identification	Site Name	Description	NRHP Eligibility
9FL80	The Fouche Mill Property	Grist mill, sawmill, fishing club	Not recommended
9FL106	The Reed/Milam Property	19 th C. log cabin/homestead	Recommended
9FL108 ^a	The Cargle Property	19 th -20 th C. residence and store	Not recommended
9FL138	The Fisher House	19 th C. homestead	Recommended
9FL148	The Fouche/Hardy Farm	19 th -20 th C. plantation and	Not recommended
		farmstead	
GP-FL-14/	The Clarence Montgomery	20 th C. tenant house	Not evaluated
CRFL14	Farm		

^a The Cargle/Cordle Store, formerly located on the Cargle Property, was moved from its original location to the Rocky Mountain Visitors Center and preserved for public education.

Based on observations from TRC's 2020 monitoring, OPC proposes the following additional archaeological field survey activities at four of the sites:

- Site 9FL80 (The Fouche Mill Property) update the site boundaries to include the Fishing Club (see below) and send an updated site form and GIS information to SHPO. Because the site has been thoroughly investigated, no additional shovel testing will be conducted at the site.
- Site 9FL138 (The Fisher House) refine the boundaries at the periphery of this NRHP-eligible site, which TRC found to be mis-plotted on SHPO maps, based on the extent of the aboveground features. A new boundary and updated site form will be recorded and submitted to SHPO. Since the site has been thoroughly evaluated, is eligible for the NRHP, and the CRMP for the Project recommends avoidance, no shovel testing will be conducted (see below).

- Site 9FL148 (The Fouche/Hardy Farm) based on observation of additional structural debris to the north of the original site boundary, refine and update the site boundaries by conducting a systematic pedestrian survey in this northern area along transects spaced no more than 15 meters (m) apart. The new site boundary will be recorded via GPS and updated site form will be recorded and submitted to SHPO.
- Site GP-FL-14/CRFL14 (The Clarence Montgomery Farm) define the site boundaries by conducting shovel testing and evaluate its NRHP eligibility status. The site has not been formally evaluated and has been avoided (see below). Shovel testing will be conducted in a radial pattern at 15-m intervals to delineate the site boundary. Based on the results of the shovel testing and the aboveground features observed, the site will be formally recorded and submitted to SHPO.

Site 9FL80 (The Fouche Mill Property)

Originally identified in 1972 on the banks of Heath Creek, the site consists of a saw and grist mill that was originally constructed in 1878. In 1925, a house known as "the Fouche Mill Fishing Club" was built for the mill workers to use on the weekends on the slope above the mill. By 1927, the mill dam was no longer functional, and the mill was abandoned in 1933. The site was first recorded in 1972. In 1983, archaeological testing conducted at the site identified features of the mill works and the Fishing Club. After the test excavations the Mill portion of the site was inundated with the formation of the lake. The Fishing Club portion of the site is located upslope from the mill. It was subject to Data Recovery Excavations in 1984; however, its location is not included on the site boundary depicted on GNAHRGIS. The site was recommended for monitoring in the CRMP and has been preserved in place. OPC proposes to update the site boundary and official site form in the GNAHRGIS database to include the Fishing Camp. The site has been thoroughly investigated and recommended for avoidance in the CRMP. Therefore, no additional shovel testing will be conducted at the site.

Site 9FL138 (The Fisher House)

Archaeological remains at the site consist of two fallen chimneys, four stone piers, and a partially filled cellar that marked the location of a residence. John F. Fisher was the first resident of Floyd County to purchase the property that contains 9FL138, and he bought it on October 22, 1849. Reports indicate the house was in ruins and abandoned by 1910. The site was evaluated through shovel testing and the excavation of 5×5 -foot and 5×5

10-foot test units and recommended eligible for the NRHP. The site was recommended for avoidance and has been preserved in accordance with the CRMP. A site visit by TRC determined that the mapped location recorded on GNAHRGIS is mis-plotted. OPC proposes to refine the boundaries of Site 9FL138 based on the extent of the aboveground features. Since the site is eligible for the NRHP and the CRMP recommends that minimal disturbance take place, no shovel testing will be conducted. The goal of the work will be to define the correct location of the site and update the site form and maps for submittal to SHPO.

Site 9FL148 (The Fouche/Hardy Farm)

Site 9FL148, is a large farm complex that dates from the mid-nineteenth to the late twentieth century. It was first identified during the 1972 survey, when the structure termed the "Fouche Homestead" was designated (9FL77). Fourteen standing structures were identified in association with the Fouche/Hardy farm during the 1978 survey conducted prior to the construction of the Rocky Mountain Project and the site was given its current site number. The Fouche/Hardy farm dates to 1859 with structures being added to the property into the mid-twentieth century. In 1997, archaeological data recovery at the site noted that all the structures were in ruins, but the portion of the property recommended for preservation retained some research potential. The site has been preserved in place in accordance with the CRMP.

During the 2020 monitoring of the Fouche/Hardy farm, additional structural debris was observed to the north of the original site boundary. Since the site is being treated as eligible for the NRHP, limited disturbance is recommended. OPC proposes a systematic pedestrian survey limited to the area north of the previously mapped boundary of the site where structural debris was observed. This survey will be conducted along transects spaced no more than 15 m apart. The new site boundary will be recorded via GPS and an updated site form will be submitted to SHPO.

Site GP-FL-14/CRFL14 (The Clarence Montgomery Farm)

Identified as Cultural Resource CRFL14 on some project maps, Site GP-FL-14 was recorded by Georgia Power employees. It has not been formally evaluated for the NRHP. In 1983, it was noted that the site consisted of a house ruin, a standing log structure, several collapsed wood frame outbuildings, and a scattering of trash. The house ruin is reported

to be the former home of Clarence Montgomery, a Black tenant on the Hardy Property. The date of construction of the house is undetermined. The house is not shown on the 1895 or the 1904 USGS map but is shown on the 1917 soil map of the county. The house is specifically mentioned in a deed from the Hardy heirs to R. F. Hardy dated December 30, 1958. Artifacts recovered from the site in 1983 dated to the twentieth century with many appearing "modern." The site is considered unassessed and has been avoided.

In order to define the boundaries of Site GP-FL-14/CRFL14, OPC proposes to delineate the site boundary with a radial pattern of shovel tests excavated at 15-m intervals. The site will be evaluated as to its NRHP eligibility and formally recorded. An official state site number will be obtained. TRC will provide recommendations for avoidance based on the results of the delineation.

Architectural Survey

The project facilities will be photo-documented, including the Upper Reservoir, Lower Reservoir, Auxiliary Pools, powerhouse, dams, penstocks, substation, and transmission lines. Recreational facilities at the Auxiliary Pools will also be documented. Views will be taken inside (when possible) and outside all buildings and engineering structures in order to document current conditions and to illustrate the Project's historic features for the purposes of assessing its potential significance. A plan map of the facility will be prepared showing the relationship of the different components to one another.

Reporting

A Cultural Resources Assessment Report will be prepared and provided to participants with the DLA for review and comment. The study report will identify and document the historic properties located within the APE that could be affected by continued operation and maintenance of the Project.

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Conduct archaeological survey	August-October 2022		
Conduct architectural survey August-October 2			
Prepare study report	March 2023		
File study report with DLA for stakeholder review	Estimated February 2024		

From: <u>Jones, Craig</u>

 To:
 ER; Ayesha R. Tarek; Santiago D. Martinez

 Cc:
 Steven Layman; McCaslin, Tyler; Norris, Sean

 Subject:
 Revised Draft Cultural Resources Study Plan

Date: Friday, July 29, 2022 9:19:00 AM

Attachments: <u>image003.png</u>

0498003 Rocky Mountain Proposed Study Plans HPD revised 07-28-2022.pdf

Good Morning,

Thanks again for the productive meeting yesterday. As discussed, attached is a revised draft cultural resources study plan, which reflects the revisions we discussed yesterday.

Please reach out with any questions or additional feedback.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com





Draft Study Plans

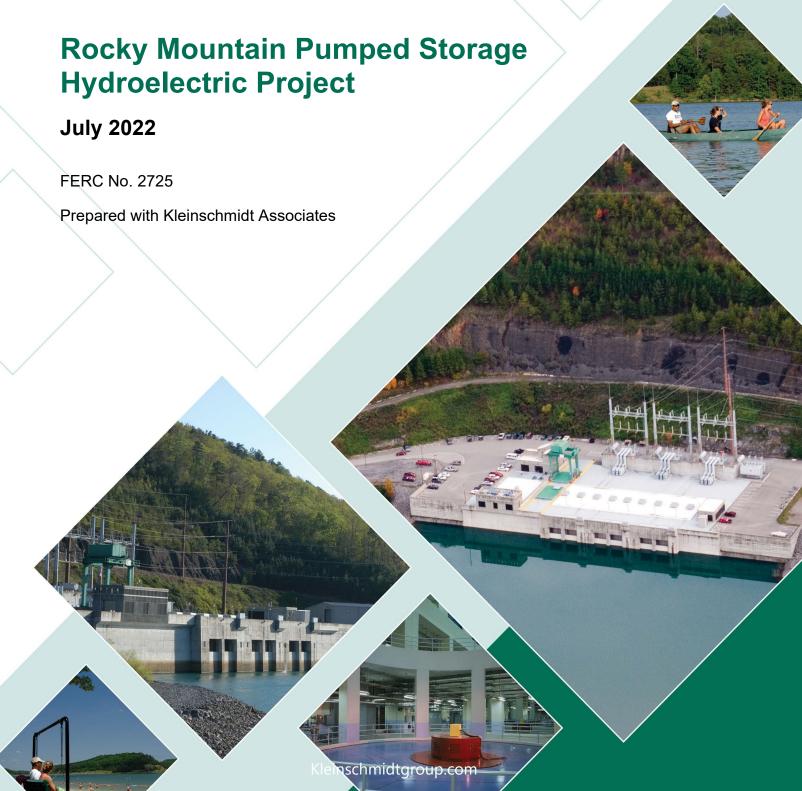


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1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resource Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. In addition, OPC consulted with GDNR on the proposed Recreation Use Analysis in meetings and email communications in April and May 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR and FWS pertaining to the recreation use analysis water quality monitoring, and fish and mussel survey site selection and mussel survey methods.

1-1

July 2022

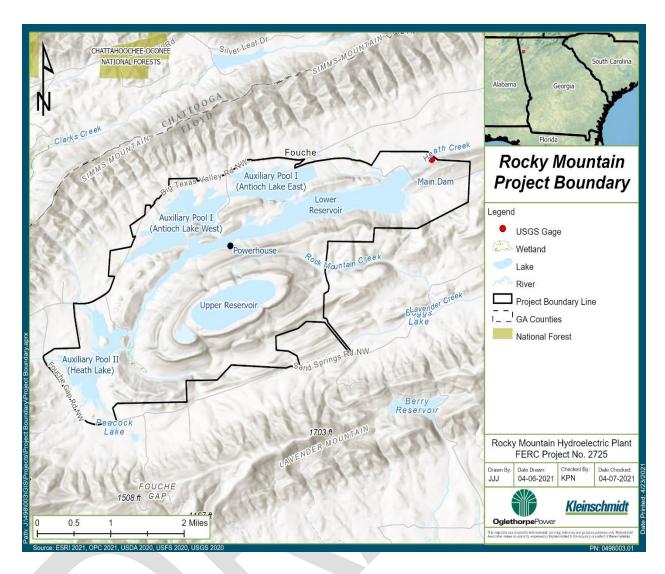


Figure 1 Project Boundary Map

2.0 CULTURAL RESOURCES ASSESSMENT

OPC proposes to conduct a cultural resources assessment of the Rocky Mountain Project to identify and evaluate archaeological and historical resources within the Area of Potential Effect (APE). All work will be conducted in accordance with the *Georgia Standards and Guidelines for Archaeological Investigations* (Revised 2019) and *Georgia Historic Resources Survey Manual* (2017). The study will consist of review of available information on known archaeological and historical sites in the project boundary, including previous extensive cultural resource assessments summarized in the PAD; an archaeological field survey to update/refine site boundaries and to determine the National Register of Historic Places (NRHP) eligibility status of one site, and an architectural field survey to evaluate the NRHP eligibility of project facilities.

2.1 Objectives

The goal of this study is to identify and document historic properties located within the APE that could be affected by continued operation and maintenance of the Project. This information will be used to modify the Project's existing Cultural Resources Management Plan (CRMP) into a new Historic Properties Management Plan (HPMP)

The specific objectives of this study are to:

- Identify and summarize known historic properties at the Project within the APE.
- Conduct an archaeological field survey for a site (GP-FL-14/CRFL 14) specified in the 2020 Cultural Resources Monitoring Report (TRC) provided in the PAD to define the site boundaries and evaluate its NRHP eligibility status.
- Refine the site boundaries and update the site forms for three previously evaluated archaeological sites (9FL80, 9FL138, and 9FL148).
- Conduct an architectural field survey to evaluate the NRHP eligibility status of project facilities, which will turn 50 years of age during the new license term.
- Evaluate the potential for effects on historic resources from continued project operation and maintenance and project-related recreation.

2.2 Study Area

The study area will be the APE, to be identified and delineated in consultation with the Georgia Department of Community Affairs Historic Preservation Division (GHPD), which is

July 2022 2-1

Georgia's state historic preservation office (SHPO), and FERC. The APE is expected to include the FERC project boundary, encompassing the project facilities, Rocky Mountain PFA, and 5,000 acres of land and water.

2.3 Methodology

OPC will contract the services of a professional cultural resources consultant who will use currently accepted practices as defined under Section 106 of the Historic Preservation Act of 1966 (as amended) and implementing regulations (36 CFR 800) for the identification and evaluation of historic properties.

Agency Consultation

OPC will consult with GHPD and FERC to define the project APE and to address overall study goals and methods. OPC will prepare map(s) showing the APE in relation to the project boundary and document GHPD and FERC concurrence with the APE.

Background Literature Research

An archaeological site file and literature review will be conducted at the research and collections facility of the University of Georgia and at Georgia's Archaeological Site File records maintained online on the Georgia Natural, Archaeological, and Historic Geographic Information System (GNAHRGIS). The review will include the *Revised Cultural Resources Management Plan for the Rocky Mountain Project, Floyd County, Georgia* (Garrow and Cleveland 1997), which provides a synthesis of the previous extensive cultural resource assessments completed at the Project and summarized in the PAD, the findings of archaeological monitoring conducted at the Project in 2020 (Appendix F of the PAD, privileged information), and existing reports and documents available from OPC.

Architectural research will also include historical research on the Rocky Mountain Project that places it in the context of large-scale hydroelectric power generation, water control features, and recreation in Georgia and the Southeast United States. Material collected will include secondary histories, primary sources, historic maps, photographs, drawings, and reports related to the planning and construction of the Project, as well as documents related to operation of the facility and management of the resources within the APE. The historical context will be illustrated, fully referenced, and used to evaluate the Project's eligibility for listing in the NRHP.

July 2022 Project Control No. 0498003.01

Archaeological Survey

In November 2020, TRC Environmental Corporation (TRC) conducted archaeological monitoring of six sites previously recommended for preservation and monitoring, with the goal of locating and visually assessing the condition of each site (Table 1). All six sites were located and shown to be well maintained and protected, with no evidence of looting, natural destruction, erosion caused by project operations, or vandalism.

Table 1 Archaeological Properties Recommended in the Rocky Mountain Project Cultural Resources Management Plan for Preservation

Site			
Identification	Site Name	Description	NRHP Eligibility
9FL80	The Fouche Mill Property	Grist mill, sawmill, fishing club	Unknown ^b
9FL106	The Reed/Milam Property	19 th C. log cabin/homestead	Recommended
9FL108 ^a	The Cargle Property	19 th -20 th C. residence and store	Unknown ^b
9FL138	The Fisher House	19 th C. homestead	Recommended
9FL148	The Fouche/Hardy Farm	19 th -20 th C. plantation and	Unknown ^b
		farmstead	
GP-FL-14/	The Clarence Montgomery	20 th C. tenant house	Unknown
CRFL14	Farm		

^a The Cargle/Cordle Store, formerly located on the Cargle Property, was moved from its original location to the Rocky Mountain Visitors Center and preserved for public education.

Based on observations from TRC's 2020 monitoring, OPC proposes the following additional archaeological field survey activities at four of the sites:

- Site 9FL80 (The Fouche Mill Property) update the site boundaries to include the Fishing Club (see below) and send an updated site form and GIS information to SHPO. Because the site has been thoroughly investigated, no additional shovel testing will be conducted at the site.
- Site 9FL138 (The Fisher House) refine the boundaries at the periphery of this NRHP-eligible site, which TRC found to be mis-plotted on SHPO maps, based on the extent of the aboveground features. A new boundary and updated site form will be recorded and submitted to SHPO. Since the site has been thoroughly evaluated, is eligible for the NRHP, and the CRMP for the Project recommends avoidance, no shovel testing will be conducted (see below).

^b Previously assessed as not eligible; unknown by current standards.

- Site 9FL148 (The Fouche/Hardy Farm) based on observation of additional structural debris to the north of the original site boundary, refine and update the site boundaries by conducting a systematic pedestrian survey in this northern area along transects spaced no more than 15 meters (m) apart. The new site boundary will be recorded via GPS and updated site form will be recorded and submitted to SHPO.
- Site GP-FL-14/CRFL14 (The Clarence Montgomery Farm) define the site boundaries by conducting shovel testing and evaluate its NRHP eligibility status. The site has not been formally evaluated and has been avoided (see below). Shovel testing will be conducted in a radial pattern at 15-m intervals to delineate the site boundary. Based on the results of the shovel testing and the aboveground features observed, the site will be formally recorded and submitted to SHPO.

Site 9FL80 (The Fouche Mill Property)

Originally identified in 1972 on the banks of Heath Creek, the site consists of a saw and grist mill that was originally constructed in 1878. In 1925, a house known as "the Fouche Mill Fishing Club" was built for the mill workers to use on the weekends on the slope above the mill. By 1927, the mill dam was no longer functional, and the mill was abandoned in 1933. The site was first recorded in 1972. In 1983, archaeological testing conducted at the site identified features of the mill works and the Fishing Club. After the test excavations the Mill portion of the site was inundated with the formation of the lake. The Fishing Club portion of the site is located upslope from the mill. It was subject to Data Recovery Excavations in 1984; however, its location is not included on the site boundary depicted on GNAHRGIS. The site was recommended for monitoring in the CRMP and has been preserved in place. OPC proposes to update the site boundary and official site form in the GNAHRGIS database to include the Fishing Camp. The site has been thoroughly investigated and recommended for avoidance in the CRMP. Therefore, no additional shovel testing will be conducted at the site.

Site 9FL138 (The Fisher House)

Archaeological remains at the site consist of two fallen chimneys, four stone piers, and a partially filled cellar that marked the location of a residence. John F. Fisher was the first resident of Floyd County to purchase the property that contains 9FL138, and he bought it on October 22, 1849. Reports indicate the house was in ruins and abandoned by 1910. The site was evaluated through shovel testing and the excavation of 5×5 -foot and 5×5

10-foot test units and recommended eligible for the NRHP. The site was recommended for avoidance and has been preserved in accordance with the CRMP. A site visit by TRC determined that the mapped location recorded on GNAHRGIS is mis-plotted. OPC proposes to refine the boundaries of Site 9FL138 based on the extent of the aboveground features. Since the site is eligible for the NRHP and the CRMP recommends that minimal disturbance take place, no shovel testing will be conducted. The goal of the work will be to define the correct location of the site and update the site form and maps for submittal to SHPO.

Site 9FL148 (The Fouche/Hardy Farm)

Site 9FL148, is a large farm complex that dates from the mid-nineteenth to the late twentieth century. It was first identified during the 1972 survey, when the structure termed the "Fouche Homestead" was designated (9FL77). Fourteen standing structures were identified in association with the Fouche/Hardy farm during the 1978 survey conducted prior to the construction of the Rocky Mountain Project and the site was given its current site number. The Fouche/Hardy farm dates to 1859 with structures being added to the property into the mid-twentieth century. In 1997, archaeological data recovery at the site noted that all the structures were in ruins, but the portion of the property recommended for preservation retained some research potential. The site has been preserved in place in accordance with the CRMP.

During the 2020 monitoring of the Fouche/Hardy farm, additional structural debris was observed to the north of the original site boundary. Since the site is being treated as eligible for the NRHP, limited disturbance is recommended. OPC proposes a systematic pedestrian survey limited to the area north of the previously mapped boundary of the site where structural debris was observed. This survey will be conducted along transects spaced no more than 15 m apart. The new site boundary will be recorded via GPS and an updated site form will be submitted to SHPO.

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July 2022 Project Control No. 0498003.01 to be the former home of Clarence Montgomery, a Black tenant on the Hardy Property. The date of construction of the house is undetermined. The house is not shown on the 1895 or the 1904 USGS map but is shown on the 1917 soil map of the county. The house is specifically mentioned in a deed from the Hardy heirs to R. F. Hardy dated December 30, 1958. Artifacts recovered from the site in 1983 dated to the twentieth century with many appearing "modern." The site is considered unassessed and has been avoided.

In order to define the boundaries of Site GP-FL-14/CRFL14, OPC proposes to delineate the site boundary with a radial pattern of shovel tests excavated at 15-m intervals. The site will be evaluated as to its NRHP eligibility and formally recorded. An official state site number will be obtained. TRC will provide recommendations for avoidance based on the results of the delineation.

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The project facilities will be photo-documented, including the Upper Reservoir, Lower Reservoir, Auxiliary Pools, powerhouse, dams, penstocks, substation, and transmission lines. Recreational facilities at the Auxiliary Pools will also be documented. Views will be taken inside (when possible) and outside all buildings and engineering structures in order to document current conditions and to illustrate the Project's historic features for the purposes of assessing its potential significance. A plan map of the facility will be prepared showing the relationship of the different components to one another.

July 2022 Project Control No. 0498003.01

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A Cultural Resources Assessment Report will be prepared and provided to participants with the DLA for review and comment. The study report will identify and document the historic properties located within the APE that could be affected by continued operation and maintenance of the Project.

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The Cultural Resources Assessment will be completed according to the milestones in Table 2.

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File study report with DLA for stakeholder review	Estimated February 2024	

From: ER

To: <u>Jones, Craig</u>

Cc: <u>Steven Layman; McCaslin, Tyler; snorris@trccompanies.com; jmeadows@nwgrc.org</u>

Subject: FERC 2725: Rocky Mountain Re-Licensing HP-201119-004 Response

 Date:
 Friday, August 5, 2022 2:48:40 PM

 Attachments:
 Floyd HP-201119-004 Aug 5 2022.pdf

External E-Mail

From: Historic Preservation Division

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

Do not respond to this e-mail.

If you have any questions concerning our letter, please contact: Santi Martinez at santiago.martinez@dca.ga.gov.

A free copy of Adobe Acrobat Reader can be downloaded from: www.adobe.com

PLEASE NOTE HPD's new address is:

Attn: Environmental Review, 60 Executive Park S, Atlanta, GA 30329 Mail forwarding is no longer available. To avoid delays, we recommend submitting projects to er@dca.ga.gov



Learn more about our commitment to fair housing.



ERGeorgia Department of Community Affairs

er@dca.ga.gov



Christopher Nunn
Commissioner

August 5, 2022

Craig Jones, PhD Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place Tucker, Georgia 30084

RE: FERC 2725: Rocky Mountain Re-Licensing

Floyd County, Georgia HP-201119-004

Dear Dr. Jones:

The Historic Preservation Division (HPD) has received the information concerning the above referenced project, including the draft report entitled, *Draft Study Plans: Rocky Mountain Pumped Storage Hydroelectric Project*, prepared by Kleinschmidt Associates and dated July 2022. Our comments are offered to assist the Federal Energy Regulatory Commission (FERC) and its applicants in complying with the provisions of Sections 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of relicensing the circa 1977 Rocky Mountain Pumped Storage Hydroelectric Project (Project) located off of Big Texas Valley Road NW in Rome. It is HPD's understanding that Oglethorpe Power Corporation is not proposing to add capacity or make any modifications to the Project under the new license. Based on the information contained in the above referenced report, HPD concurs with the proposed area of potential effect (APE) and finds that the study plans are consistent with current methods, adequate to document important information contained at archaeological sites 9FL80, 9FL138, 9FL148, and GP-FL-14/McClaren's Montgomery Farm, and appropriate to fulfill Oglethorpe Power Corporation's responsibilities under Section 106 of the NHPA. HPD looks forward to receiving the cultural resources assessment report, once available.

Please refer to project number **HP-201119-004** in future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact Santiago Martinez, Environmental Review Historian, at Santiago.Martinez@dca.ga.gov or (404) 486-6425 or Ayesha Tarek, Compliance Archaeologist, at Ayesha.Tarek@dca.ga.gov or (404) 486-6440.

Sincerely,

Stacy Rieke, MHP Program Manager

Environmental Review & Preservation Planning

SMR/sdm

cc: Steven Layman, Kleinschmidt Associates

Tyler McCaslin, Oglethorpe Power Corporation

Sean Norris, TRC Companies

Julianne Meadows, Northwest Georgia Regional Commission



General outline for Land Study Plans:

Describe history of land use and management (e.g. timbering and burning).

- Utilize historic aerials to map historical land use.
- Document and map past burns.

Document current plant communities.

- Perform gridded or meandering surveys to observe and delineate plant communities.
- Measure plant species composition and structure by performing botanical inventory plots (0.1
 hectare) in each large community. Follow NatureServe conventions for naming and describing
 plant communities.
- Describe how historical land use has impacted the current plant communities.
- Survey for rare species. Obtain target species list from GADNR WCS Botany. Map, count, and voucher individuals at every population.
- Survey for invasive species. Obtain target species list from EDDMapS. Map, count, and voucher individuals at every population, and submit data to EDDMapS.

Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review.

Comments on: Oglethorpe Power. Draft Study Plans. Rocky Mountain Pumped Storage Hydroelectric Project. June 2022. FERC No. 2725. Prepared with Kleinschmidt Associates.

Provided by Gemma Milly, Botanist, Georgia DNR Wildlife Conservation Section. August 8th, 2022.

Chapter 4: Terrestrial and Wetlands Resource Survey

- 4.2 Study area. Please provide map. Should include entire PFA.
- 4.3 Methodology.

Review EDDMapS resources to identify invasive species in southeast

Inventory surveys should be conducted once in spring, once in summer, and once in fall, to have access to reproductive parts necessary for identification of all species present. Several rare species in the area (especially in genus Carex) will no longer be identifiable by July.

Define species to be surveyed. Will you be surveying nonvascular plants? All vascular plants including grasses, sedges, and rushes? Including submersed aquatic plants? Only flowering plants? We would expect a full vascular inventory, and nonvascular plants would be ideal.

Plant community types should be measured structurally as well as for dominant species composition. Perform full botanical inventory plots (0.1 hectare) in each large community, and describe structural composition (height classes and percent foliar cover) per NatureServe standards.

Obtain a target rare species list from GADNR Botany.

In addition to specific location information for rare species. All rare species data must remain confidential, including even the presence of any given species on the property.

Survey for invasive species. Obtain target species list from EDDMapS. Map, count, and voucher individuals at every population, and submit data to EDDMapS.

Provide all GPS survey tracks in the report to document survey effort.

Describe history of land use and management (e.g. timbering and burning). Utilize historic aerials to map historical land use. Document and map past burns.

Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review.

Document Accession #: 20220811-5097 Filed Date: 08/11/2022



1050 Thomas Jefferson Street, NW Seventh Floor Washington, DC 20007 (202) 298-1800 Phone (202) 338-2416 Fax

Michael A. Swiger (202) 298-1891 mas@vnf.com

VIA ELECTRONIC FILING

August 11, 2022

Kimberly D. Bose Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: Rocky Mountain Pumped Storage Hydroelectric Project No. 2725; Responses to Georgia Department of Natural Resources Wildlife Resources Division and U.S. Fish and Wildlife Service Comments on the Pre-Application Document and Proposed Studies

Dear Secretary Bose,

Oglethorpe Power Corporation hereby submits its responses to comments filed by Georgia Department of Natural Resources Wildlife Resources Division and U.S. Fish and Wildlife Service Comments on the Pre-Application Document and proposed studies for the Rocky Mountain Pumped Storage Hydroelectric Project No. 2725.

If you have any questions, please contact the undersigned or Craig Jones at craig.jones@opc.com or 770-270-7348.

Respectfully submitted,

Michael A. Swiger

Counsel to Oglethorpe Power Corporation

Attachment

August 9, 2022

Mr. Ted Will Georgia Department of Natural Resources Wildlife Resources Division 2067 U.S. Highway 278 S.E. Social Circle, GA 30025 Certified Mail/Return Receipt 7021 0950 0000 8589 6060

Mr. Peter Maholland US Department of the Interior Fish & Wildlife Service North Georgia Office, Rm 320, Box7 Athens, GA 30601 Certified Mail/Return Receipt 7021 0950 0000 8589 6046

Re: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. P-2725) Responses to Georgia Department of Natural Resources Wildlife Resources Division and U.S. Fish and Wildlife Service Comments on the Pre-Application Document and Proposed Studies

On May 12 and May 13, 2022, respectively, Georgia Department of Natural Resources Wildlife Resources Division (GADNR) and U.S. Fish and Wildlife Service (USFWS) filed comments with the Federal Energy Regulatory Commission (FERC) on the Pre-Application Document and proposed studies for the Rocky Mountain Pumped Storage Hydroelectric Project (Project). After reviewing the comments and conducting follow up meetings with both agencies, Oglethorpe Power Corporation is providing the attached responses to comments.

Both comment letters made recommendations that are addressed in OPC's responses. In each case, OPC either clarified that the recommendation was already addressed in the proposed studies or revised the proposed studies to accommodate the request. The revisions reflected in our responses capture the outcome of our subsequent consultation meetings with each agency. Notably, it is OPC's understanding that there are no lingering areas of disagreement with respect to these comments.

OPC appreciates the productive working relationship with both agencies. Please do not hesitate to reach out with any questions as we move into the study phase of this relicensing process.

Sincerel

Craig A Jones PhD

Director, Environmental Policy

c: David Sorrick, OPC

Jim Messersmith, OPC

Toni Presnell, OPC Herbie Johnson, GPC

Courtenay O'Mara, GPC

Rocky Mountain Leasing Corporation

US Bank National Association

Michael Spencer, FERC

Michael Swiger, Van Ness Feldman

Steven Layman, Kleinschmidt Associates

Document Accession #: 20220811-5097

Stakeholder Distribution List (via email)

Jaime Loichinger, Advisory Council on Historic Preservation

John Eddins, Advisory Council on Historic Preservation

Cecilia Flores, Alabama-Coushatta Tribe of Texas

Nelson Harjo, Alabama-Quassarte Tribal Town

Ben Emanuel, American Rivers

Kevin Colburn, American Whitewater

Stephen Briggs, Berry College

Darryl LaCounte, Bureau of Indian Affairs, U.S. Dept. of the Interior

Jason winters, Chattooga County

Chuck Hoskin Jr., Cherokee Nation

Elizabeth Toombs, Cherokee Nation

Craig McDaniel, City of Rome

Harry Harvey, City of Summerville

Jesse Demonbreun-Chapman, Coosa River Basin Initiative

Linda Langley, Coushatta Tribe of Louisiana

David Sickey, Coushatta Tribe of Louisiana

Richard Sneed, Eastern Band of Cherokee Indians

Russell Towsend, Eastern Band of Cherokee Indians

Jamie McCord, Floyd County

Bruce Ivey, Floyd County

David Crass, Georgia Dept. of Community Affairs - Historic Preservation Division

Jennifer Dixon, Georgia Dept. of Community Affairs - Historic Preservation Division

Santiago Martinez, Georgia Dept. of Community Affairs - Historic Preservation Division

Ayesha Tarek, Georgia Dept. of Community Affairs - Historic Preservation Division

James Capp, Georgia Dept. of Natural Resources - Environmental Protection Division

Elizabeth Booth, Georgia Dept. of Natural Resources - Environmental Protection Division

Jennifer Welte, Georgia Dept. of Natural Resources - Environmental Protection Division

Wei Zeng, Georgia Dept. of Natural Resources - Environmental Protection Division

Stephen Wiedl, Georgia Dept. of Natural Resources - Environmental Protection Division

Dennis Shiley, Georgia Dept. of Natural Resources Parks, Recreation & Historic Sites Division

Rusty Garrison, Georgia Dept. of Natural Resources - Wildlife Resources Division

Thom Litts, Georgia Dept. of Natural Resources - Wildlife Resources Division

Scott Robinson, Georgia Dept. of Natural Resources - Wildlife Resources Division

Document Accession #: 20220811-5097

Clint Peacock, Georgia Dept. of Natural Resources - Wildlife Resources Division
Jim Hakala, Georgia Dept. of Natural Resources - Wildlife Resources Division
Jon Ambrose, Georgia Dept. of Natural Resources - Wildlife Resources Division
Brett Albanese, Georgia Dept. of Natural Resources-Wildlife Resources Division
Brent Womack, Georgia Dept. of Natural Resources - Wildlife Resources Division
Paula Marcinek, Georgia Dept. of Natural Resources - Wildlife Resources Division
Jackson Sibley, Georgia Dept. of Natural Resources - Wildlife Resources Division
David Gregory, Georgia Dept. of Natural Resources - Wildlife Resources Division
Theron Menken, Georgia Dept. of Natural Resources - Wildlife Resources Division
Jeff Sibley, Georgia Forestry Commission

Mike Brunson, Georgia Forestry Commission

Herbie Johnson, Georgia Power Company (c/o Southern Company Generation)

Courtenay O'Mara, Georgia Power Company (c/o Southern Company Generation)

Rena Ann Peck, Georgia River Network

Jason Winters, Georgia Soil and Water Conservation Commission Region II

Brian Givens, Kialegee Tribal Town

David Hill, Muscogee (Creek) Nation

Corain Lowe-Zepeda, Muscogee (Creek) Nation

LeeAnne Wendt, Muscogee (Creek) Nation

Turner Hunt, Muscogee (Creek) Nation

Bob Vogel, National Park Service

Kim Amendola, National Oceanic and Atmospheric Administration Fisheries Service

Lloyd Frasier, Northwest Georgia Regional Commission

Marcellus Osceola, Jr., Seminole Tribe of Florida

Theodore Isham, Seminole Nation of Oklahoma

David Frank, Thlopthlocco Tribal Town

Joe Bunch, United Keetoowah Band of Cherokee

John Blevins, U.S. Environmental Protection Agency Region 4

Ntale Kajumba, U.S. Environmental Protection Agency Region 4

Maria Clark, U.S. Environmental Protection Agency Region 4

John Doresky, U.S. Fish and Wildlife Service

Eric Bauer, U.S. Fish and Wildlife Service

Peter Maholland, U.S. Fish and Wildlife Service

Edward Hunter, U.S. Forest Service - Chattahoochee National Forest

Document Accession #: 20220811-5097 Filed Date: 08/11/2022

ATTACHMENT A

Oglethorpe Power Response to Georgia Department of Natural Resources comments.

Response to Letter from Georgia Department of Natural Resources Wildlife Resources Division Dated May 12, 2022

4.4.1.1 Distribution of Fishes in the Project Vicinity

Table 10 should be amended to reflect the non-native, invasive status of the Red Shiner, which is currently indicated to be native.

Response 1:

 The non-native status of the Red Shiner is noted and will be corrected in the Aquatic Resources Study Report and the license application.

4.5 Wildlife and Botanical Resources

We request that OPC collaborate with the Georgia Department of Natural Resources Wildlife Resources Division (GADNR WRD) to update the terrestrial wildlife and botanical management plan for the project area to reflect updates to GADNR WRD management policies and implement necessary measures to protect recently surveyed botanical resources.

Response 2:

 Based on the findings of OPC's Terrestrial and Wetland Resources Survey, as proposed in the Pre-Application Document (PAD) and the Joint Meeting, OPC will collaborate with GADNR WRD on updating the terrestrial wildlife and botanical management plan for the project boundary.

4.7 Rare, Threatened, and Endangered Species

Section 4.7 and Table 18 should be amended as follows:

- Include accounts of the following federal and state listed species which are historically known from Floyd County and the Little Armuchee (0315010304) HUC10 Watershed: Blue Shiner, Rock Darter, and Cherokee Clubtail.
- 2. Coldwater Darter status should be corrected to state endangered.
- 3. *Crataegus trifloral* is duplicated under a second common name, Rome Hawthorne, which is a different species and is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.
- 4. *Lysimachia graminea* is afforded no state or federal protection and should be removed from the table.
- 5. *Villosa umbrans* is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.

Response 3:

• The status of these species is noted and will be correctly reflected and the species list updated in the relicensing study reports and license application.

4.7.1.2 State Protected Plant and Wildlife Species

OPC states that it is unlikely that state protected aquatic species are present in the project area. Due to limited area of available habitat. We recommend revising this statement to acknowledge that Heath Creek downstream of the dam may provide suitable habitat for these and other rare species.

Response 4:

 The description of potentially suitable habitat for state protected aquatic species will be updated as appropriate in the license application to reflect the results of OPC's Aquatic Resources Study, as proposed in the PAD and the Joint Meeting, which will include surveys for native fish and mussels in Heath Creek.

4.8.1.2 Form 80 Licensed Hydropower Development Recreation Report

While the Form 80 data have some limited descriptive value, they are likely insufficient for determining public recreational use patterns and provide no assessment of user satisfaction with the various components of the Project's recreation facility (PFA). More concise and updated recreational data would aid in determining current public use and satisfaction, which will be critical to guiding GADNRs future recreation management strategy over the new license period.

Response 5:

Based on consultation meetings and communications with GADNR in April and May 2022, OPC
has revised its proposed study methodology for the Recreation Use Analysis to incorporate
the use of recreation user surveys. Combined with GADNR's existing information on
attendance records, traffic count data, and staff observations, the surveys will provide for
robust analysis of recreational use patterns and user satisfaction in the license application.
OPC continues to consult with GADNR on the user survey schedule and survey forms, as
described in Responses 9-12 below.

5.2.1.1 Water Quality Assessment

We support OPC's general water quality monitoring plan, however, we request that OPC incorporate the following recommendations into the study design:

- 1. Collect water quality data for a period of two years to minimize effects of temporal variation in dataset.
- 2. Georgia DNR WRD requests the ability to review the proposed water quality plan pending the results of the Heath Creek aquatic resources studies described in section 5.2.1.2. The proposed monthly sample collection may not be sufficient to assure the needs of the fishes and mussels are being met.

Response 6:

The PAD summarizes existing water quality data for Heath Creek based on monitoring conducted by OPC and GADNR's Environmental Protection Division. These data indicate good overall water quality conditions, with the exception of fecal coliform bacteria, which has been attributed to nonpoint source runoff, including wildlife, agricultural livestock, and urban development (e.g., leaking septic systems) and is unrelated to the operation of the Rocky Mountain Project. To be responsive to U.S. Fish and Wildlife Service's (USFWS) request for continuous monitoring and address GDNR's above comment about the sufficiency of monthly water quality data collection, OPC will add continuous monitoring of dissolved oxygen (DO) concentration and water temperature in Heath Creek downstream of the Main Dam for one year beginning in June 2022. A DO data logger will be placed in the stream within the direct influence of the release from the Main Dam at a location determined in consultation with GADNR. The data logger will record DO concentration and water temperature hourly and will be downloaded and maintained during the monthly water quality monitoring events. Additionally, OPC will evaluate the one year of water quality monitoring results in conjunction with the results of fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GADNR and USFWS to determine whether a second year of water quality monitoring is warranted.

5.2.1.2 Aquatic Resources Study

We appreciate OPC's recognition that RMPSP impacts aquatic wildlife downstream of project area and their intent to conduct fish and mussel community surveys in Heath Creek. We support their decision to re-sample the GADNR Stream Survey Team site, which was last sampled in 2001 and have the following additional recommendations:

- 1. Conduct a fish survey at one additional site in Heath Creek, upstream of the GADNR site, closer to the dam.
- 2. Fish and mussel site selection and mussel survey methods should be developed in consultation with the GADNR Freshwater Biodiversity Program.

Response 7:

• The purpose of the Aquatic Resources Study is to develop the information necessary to assess whether potential impacts exist to aquatic wildlife downstream of the Project. In addition to the GADNR site, OPC is proposing to sample at a site closer to the Main Dam. As described in the Joint Meeting and presented in OPC's Study Plan, the fish community survey will be conducted at two sites on Heath Creek, including the site at Texas Valley Road previously sampled by GADNR in 2001-2002 and a second site within the project boundary between the Main Dam and U.S. Geological Survey Gage No. 02388320. Each station will be surveyed once during the period June-September 2022 following GADNR's Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GADNR 2020). Fish will be sampled using backpack electrofishing and the data will be analyzed using the multi-metric Index of Biotic Integrity to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion. OPC will consult with GADNR on the sampling site selection and mussel survey methods prior to the field data collection in 2022.

5.2.1.3 Terrestrial and Wetland Resources Survey

We support OPC's intent to update the terrestrial and botanical resources inventory within the project boundary. GADNR is involved with recent research projects within the park that have identified several non-listed plant species of conservation concern and potentially one undescribed plant species. Several unique habitats have also been noted during these studies.

We request that OPC consult with the GADNR Wildlife Conservation Section prior to developing survey methods for botanical resources.

Response 8:

• OPC proposes to conduct a field reconnaissance survey within the project boundary to observe and describe representative terrestrial and wetland vegetive communities, representative plant and animal species that use these habitats, potentially suitable habitat for rare, threatened, and endangered species of plants and animals, and invasive species. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources within the project boundary, and in fall 2022 and spring 2023 to survey for rare, threatened, and endangered plant species flowering in those seasons. OPC will consult with GADNR on the survey methods for botanical resources in the study plan.

5.2.1.4 Preliminary Studies - Recreation Use Analysis

Given the importance of public recreation at the Project, we believe the proposed Recreational Use Analysis (RUA) should be more robust and include collection of additional data on public use characteristics and user satisfaction levels.

1. In addition to review of existing recreational use data as proposed, we recommend the RUA include an in-situ interview-based survey representative of all PFA users and not just "targeted user groups" (ie. fishing, hunting, and boating clubs). There are few such-organized groups at the PFA and they are not representative of all user types.

Response 9:

• OPC has revised the proposed study methodology to include on-site surveys (15 survey days, 8 hours per day, two staff per day) during the summer and fall of 2022 and spring of 2023. The purpose of these surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities. Annual recreation use will be estimated using GDNR traffic count data, as described below in Response 12. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays) using the survey form developed in consultation with GADNR. A two-person field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake

entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June 2022 through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GADNR.

2. We recommend the RUA accurately characterize current recreational user types and their satisfaction with key aspects of the PFA (ie. fishing quality, amenities)

Response 10:

- OPC developed two survey forms in consultation with GADNR that include similar questions to the GADNR survey used in their 2006 study. One survey form will be used at the Main Entrance, Heath Entrance, and Beach Entrance. The other survey form will be available at the Campground Entrance. Key questions include listing the primary reason for visiting, perceptions on fishing and hunting experience, and rating (1-very poor to 5-very good) of various amenities.
- 3. The RUA should also include an assessment that describes key existing PFA facilities (ie. campground, beach, boat ramps), their associated amenities (ie. bathrooms/sewer infrastructure, boat ramps and associated parking, docks, cellular service quality) and their condition. We recommend the assessment also evaluate current recreational user satisfaction with those facilities/amenities and need for Americans with Disabilities Act (ADA) improvements.

Those include: 1) need for Americans with Disabilities Act (ADA) accessible fishing access at Antioch and Heath Lakes; 2) safety and operational concerns associated with current cellular service at the facility; 3) crowding and safety concerns at the Heath Lake Boat Ramp given the rise and popularity of kayak use of the ramp; 4) campground and beach sewer infrastructure condition.

Response 11:

• A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified. In addition, surveys collected at the PFA include questions on user satisfaction with facilities/amenities. The surveys also include an open-ended question regarding additional facilities needed, which will provide the respondent an opportunity to request ADA improvements or address any other concerns they may have.

As discussed in an April 22, 2022 meeting with GADNR, and OPC and Kleinschmidt representatives, the recreational use survey should be statistically valid and sufficiently robust to ensure the data collected are accurately representative of PFA users. Variables and user satisfaction levels to be assessed should be comparable to the recreational user study conducted by GADNR in 2006-2007 and shared with OPC

and Kleinschmidt. A representative survey of resource users over a one-year period should be employed as opposed to surveying only "targeted user groups" (i.e., fishing, hunting, boating clubs) over an abbreviated period. The study should also account for seasonal, weather, and day of the week variability in public use. The facility assessment should describe and adequately assess key existing structure condition. User satisfaction with those amenities may be obtained during the recommended recreational user interviews.

Response 12:

As described in Responses 5, 9, and 10 above, OPC has revised the proposed study methodology based on consultation with GADNR. The revised recreation survey methodology and level of effort are similar to those used by GADNR in 2006-2007 and are consistent with common practice in recreation studies conducted during relicensing. In the GADNR 2006-2007 study, recreation users were surveyed on 155 days during randomly selected two-hour periods by one GADNR surveyor. OPC will use similar survey forms developed in consultation with GADNR and a similar overall level of effort, with the main difference being that OPC will survey users on a fewer number of days but during eight-hour periods by two surveyors, such that total survey hours will be similar to the 2006-2007 study. As such, OPC expects the recreation survey to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the recreation opportunities and amenities at the PFA, and for comparison with the 2006-2007 survey results. As described in Response 9, Recreation users at the Project will be surveyed on 15 days between June 2022 and May 2023. Specifically, a field crew of two will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. The surveys will yield substantial information about users, reasons for their visits, perspectives on the quality of their recreation experience, and suggestions for improvements. As noted, the survey forms were developed in consultation with GADNR to include many of the same and similar questions as used in the 2006-2007 study.

In addition, OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022, for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days," which FERC defines as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation

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demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GADNR.



MARK WILLIAMS COMMISSIONER

TED WILL DIRECTOR

May 12, 2022

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Room 1A Washington, DC 20426

RE:

Comments on Pre-Application Document (PAD)

Rocky Mountain Pumped Storage Hydropower Project (P-2725)

Dear Secretary Bose:

We appreciate the opportunity to review the Pre-Application Document (PAD), included with Oglethorpe Power Corporation's (OPC) Notice of Intent filed with your agency on December 10, 2021. Our staff attended the Joint Agency Meeting held March 16, 2022 and have since met with OPC to begin development of a recreational user survey. We support OPC's intent to conduct surveys to update the natural and recreational inventories within the project area and assess opportunities for upgrades.

We recognize that this project has impacts to the water quality, aquatic habitats and species, and recreational opportunities within and downstream of the project area. Attached are comments and recommendations related to the PAD, and we look forward to working with OPC to develop study plans that adequately characterize the natural and recreational resources and project impacts.

Sincerely

Ted Will

Cc. Jon Ambrose
Scott Robinson

4.0 EXISTING ENVIRONMENTAL AND RESOURCE IMPACTS

4.4.1.1 Distribution of Fishes in the Project Vicinity

Table 10 should be amended to reflect the non-native, invasive status of the Red Shiner, which is currently indicated to be native.

4.5 Wildlife and Botanical Resources

We request that OPC collaborate with the Georgia Department of Natural Resources Wildlife Resources Division (GADNR WRD) to update the terrestrial wildlife and botanical management plan for the project area to reflect updates to GADNR WRD management policies and implement necessary measures to protect recently surveyed botanical resources.

4.7 Rare, Threatened, and Endangered Species

Section 4.7 and Table 18 should be amended as follows:

- Include accounts of the following federal and state listed species which are historically known from Floyd County and the Little Armuchee (0315010304) HUC10 Watershed: Blue Shiner, Rock Darter, and Cherokee Clubtail.
- 2. Coldwater Darter status should be corrected to state endangered.
- 3. Crataegus trifloral is duplicated under a second common name, Rome Hawthorne, which is a different species and is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.
- 4. Lysimachia graminea is afforded no state or federal protection and should be removed from the table.
- 5. Villosa umbrans is afforded no state or federal protection (however is a State Wildlife Action Plan species) and should be removed from the table.

4.7.1.2 State Protected Plant and Wildlife Species

OPC states that it is unlikely that state protected aquatic species are present in the project area. Due to limited area of available habitat. We recommend revising this statement to acknowledge that Heath Creek downstream of the dam may provide suitable habitat for these and other rare species.

4.8 Recreation and Land Use

4.8.1.1 Existing Recreational Facilities

Of the approximately 5,000 acres of land and water within the Rocky Mountain Project boundary, 3,700 acres are available to the public for recreation within the Rocky Mountain Recreation and Public Fishing Area (PFA). From 2017 through 2021, GADNR WRD estimated the PFA averaged 339,500 visitors annually. The PFA and its recreational amenities are managed and operated by the GADNR WRD through contract with OPC. This unique long-term cooperative partnership has proven successful at meeting GADNR's resource management goal of providing a high quality outdoor recreational experience for the public.

4.8.1.2 Form 80 Licensed Hydropower Development Recreation Report

The PAD includes estimates of recreational use and Amenity Capacity Utilization from the FERC Licensed Hydropower Development Recreation Report (Form 80) from 2014. These statistics are presented as

daytime recreation days and nighttime recreation nights, and a peak weekend day and nighttime averages. Percent recreation capacity utilization of the various amenities at the Rocky Mountain Project in 2014 are also presented (Table 19). The Form 80 report was developed using data collected by the GADNR year-round using traffic counters and attendance records. While the Form 80 data have some limited descriptive value, they are likely insufficient for determining public recreational use patterns and provide no assessment of user satisfaction with the various components of the Project's recreation facility (PFA). More concise and updated recreational data would aid in determining current public use and satisfaction, which will be critical to guiding GADNRs future recreation management strategy over the new license period.

5.0 PRELIMINARY ISSUES AND STUDIES LIST

5.2.1.1 Water Quality Assessment

We support OPC's general water quality monitoring plan, however, we request that OPC incorporate the following recommendations into the study design:

- 1. Collect water quality data for a period of two years to minimize effects of temporal variation in dataset.
- Georgia DNR WRD requests the ability to review the proposed water quality plan pending the
 results of the Heath Creek aquatic resources studies described in section 5.2.1.2. The proposed
 monthly sample collection may not be sufficient to assure the needs of the fishes and mussels are
 being met.

5.2.1.2 Aquatic Resources Study

We appreciate OPC's recognition that RMPSP impacts aquatic wildlife downstream of project area and their intent to conduct fish and mussel community surveys in Heath Creek. We support their decision to re-sample the GADNR Stream Survey Team site, which was last sampled in 2001 and have the following additional recommendations:

- 1. Conduct a fish survey at one additional site in Heath Creek, upstream of the GADNR site, closer to the dam.
- 2. Fish and mussel site selection and mussel survey methods should be developed in consultation with the GADNR Freshwater Biodiversity Program.

5.2.1.3 Terrestrial and Wetland Resources Survey

We support OPC's Intent to update the terrestrial and botanical resources inventory within the project boundary. GADNR is involved with recent research projects within the park that have identified several non-listed plant species of conservation concern and potentially one undescribed plant species. Several unique habitats have also been noted during these studies.

We request that OPC consult with the GADNR Wildlife Conservation Section prior to developing survey methods for botanical resources.

5.2.1.4 Preliminary Studies - Recreation Use Analysis

The preliminary study proposes to analyze recreational use with a defined objective of characterizing the existing facilities and recreation use through review of existing information, contact with targeted user groups (ie. fishing, hunting, boating clubs), and description and inventory of existing facilities. Given the Importance of public recreation at the Project, we believe the proposed Recreational Use Analysis (RUA) should be more robust and include collection of additional data on public use characteristics and user satisfaction levels.

Key Study Elements

- 1. In addition to review of existing recreational use data as proposed, we recommend the RUA Include an in-situ interview-based survey representative of all PFA users and not just "targeted user groups" (ie. fishing, hunting, and boating clubs). There are few such organized groups at the PFA and they are not representative of all user types.
- 2. We recommend the RUA accurately characterize current recreational user types and their satisfaction with key aspects of the PFA (ie. fishing quality, amenities)
- 3. The RUA should also include an assessment that describes key existing PFA facilities (ie. campground, beach, boat ramps), their associated amenities (ie. bathrooms/sewer infrastructure, boat ramps and associated parking, docks, cellular service quality) and their condition. We recommend the assessment also evaluate current recreational user satisfaction with those facilities/amenities and need for Americans with Disabilities Act (ADA) improvements.

The need for additional information and nexus to development of license requirements

This RUA will provide current information needed by GADNR WRD to manage the existing recreation resources of the PFA to provide a high quality public outdoor recreational experience. This information will also enable GADNR to better partner with the licensee to manage and potentially improve recreational opportunities for PFA users. The inventory of key existing PFA facilities, their associated amenities, condition, and current user satisfaction of those facilities will allow GADNR and the licensee to better evaluate several possible issues identified in GADNR's Pre-Application Document Questionnaire for FERC Relicensing. Those include: 1) need for Americans with Disabilities Act (ADA) accessible fishing access at Antioch and Heath Lakes; 2) safety and operational concerns associated with current cellular service at the facility; 3) crowding and safety concerns at the Heath Lake Boat Ramp given the rise and popularity of kayak use of the ramp; 4) campground and beach sewer infrastructure condition.

Proposed study methodology

As discussed in an April 22, 2022 meeting with GADNR, and OPC and Kleinschmidt representatives, the recreational use survey should be statistically valid and sufficiently robust to ensure the data collected are accurately representative of PFA users. Variables and user satisfaction levels to be assessed should be comparable to the recreational user study conducted by GADNR in 2006-2007 and shared with OPC and Kleinschmidt. A representative survey of resource users over a one-year period should be employed as opposed to surveying only "targeted user groups" (i.e. fishing, hunting, boating clubs) over an abbreviated period. The study should also account for seasonal, weather, and day of the week variability in public use. The facility assessment should describe and adequately assess key existing structure condition. User satisfaction with those amenities may be obtained during the recommended recreational user interviews.

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ATTACHMENT B

Oglethorpe Power Response to US Department of the Interior Fish and Wildlife Service comments.

Response to Letter from U.S. Fish and Wildlife Service Dated May 13, 2022

After discussion with regional partners, we recognize that there is a lack of continuous water quality monitoring in the Upper Coosa River basin, a basin inhabited by many Threatened and Endangered species...Therefore, the Heath Creek and the Armuchee Creek watershed contain a high diversity of imperiled, protected, threatened, or endangered aquatic species and thus continuous water quality monitoring data would be essential for natural resource agencies in protecting, managing, and restoring populations of these species.

Beneficial flushing of excess organic material and fecal coliform, and therefore dissolved oxygen concentrations, are heavily influenced by hydrology which could be impacted by dam releases and operations (e.g., minimum flows).

Based on the above information, the Service requests that the FERC consider requiring that Oglethorpe Power Corporation fund water quality sensors (Specific Conductivity, Water Temperature, and Dissolved Oxygen) on United States Geological Survey (USGS) discharge gauge 02388320 (0.3 miles downstream of the project outflow) for the duration of the project license...Such real-time continuous data is much better at accurately assessing water quality across various hydrological conditions and improve the ability to establish causal mechanisms influencing water quality, whereas instantaneous grab-type sampling is usually insufficient for such studies and is primarily dependent on the prevailing hydrological and weather conditions at the time of sampling.

Response 1:

Presently, there are no known occurrences of federally threatened and endangered or state protected aquatic species occurring in Heath Creek, but OPC acknowledges a lack of available sampling records for freshwater mussels and snails in Heath Creek. As described in the PAD, fish surveys conducted by OPC in 1995-1996 and by GADNR in 2001-2002 did not collect any federally or state-listed threatened and endangered species. OPC's proposed Aquatic Resources Study, which includes a fish community survey and a freshwater mollusk survey for RTE species of mussels and snails, will collect information necessary for evaluating potential impacts on aquatic communities downstream of the Project. Based on the results of this study and the Water Quality Assessment study, OPC will evaluate in the license application the need for continuous water quality monitoring at the USGS gage for the duration of the license. Additionally, as discussed in more detail in Response 6, OPC will collect continuous water quality monitoring data for one year and then evaluate whether a second year is warranted.

United States Department of the Interior Fish and Wildlife Service

Georgia Ecological Services Email: GAES_Assistance@FWS.gov Website: FWS.gov/office/Georgia-Ecological-Services/

North Georgia Office 355 East Hancock Ave, Room 320, Box 7 Athens, GA 30601 Phone: (706) 613-9493

West Georgia Office P.O. Box 52560 Ft. Benning, GA 31995-2560 Phone: (706) 544-6030 Fax: (706) 544-6419 Coastal Georgia Office 4980 Wildlife Drive NE Townsend, GA 31331 Phone: (912) 832-8739

May 13, 2022

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

Subject: Study Plans and Request for Studies for the Rocky Mountain Pumped Storage Hydropower Project, FERC Project Number P-2725-075

Dear Ms. Bose:

On March 16, 2022 Oglethorpe Power Corporation (OPC) held a joint meeting to discuss study plans for the upcoming relicensing of the Rocky Mountain Pumped Storage Hydropower Project. We, the Fish and Wildlife Service (Service), submit the following comments pursuant to the authorities of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. § 1531 et seq.), the Fish and Wildlife Coordination Act (16 U.S.C. § 661 et seq.), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), and the Federal Power Act (16 U.S.C. § 791a, et seq.).

After discussion with regional partners, we recognize that there is a lack of continuous water quality monitoring in the Upper Coosa River basin, a basin inhabited by many Threatened and Endangered species. Increasing the coverage of continuous water quality data that can help inform restoration, recovery, and management actions across the basin is a priority of the Service and several other organizations that are members of the Partnership for the Upper Coosa River Basin. Heath Creek specifically, occurs in the Armuchee Creek watershed where several Threatened and Endangered species have been recorded or could occur including, but not limited to, the finelined pocketbook (*Hamiota atilis*), interrupted rocksnail (*Leptoxis foremani*), southern clubshell (*Pleurobema decisum*), southern pigtoe (*Pleurobema georgianum*), rayed kidneyshell (*Ptychobranchus foremanianus*), and the trispot darter (*Etheostoma trisella*). Additionally, several state protected or imperiled species occur in either Heath Creek or the Armuchee Creek watershed including the Coosa fiveridge (*Amblema elliottii*), greensaddle crayfish (*Cambarus manningi*), cylinder campeloma (*Campeloma regulare*), Etowah heelsplitter (*Lasmigona etowaensis*), cylindrical Lioplax (*Lioplax cyclostomaformis*), brook hornsnail (*Pleurocera*

vestita), ridged mapleleaf (Quadrula rumphiana), Cherokee clubtail (Stenogomphurus consanguis), Alabama rainbow (Villosa nebulosa), Coosa creekshell (Villosa umbrans), rock darter (Etheostoma rupestre), lined chub (Hybopsis lineapunctata), least brook lamprey (Lampetra aepyptera), mountain shiner (Lythrurus lirus), and burrhead shiner (Notropis asperifrons). Therefore, the Heath Creek and the Armuchee Creek watershed contain a high diversity of imperiled, protected, threatened, or endangered aquatic species and thus continuous water quality monitoring data would be essential for natural resource agencies in protecting, managing, and restoring populations of these species.

Heath Creek below the Rocky Mountain Pumped Storage Hydropower Project is currently a 303d listed stream according to Georgia Environmental Protection Division due to fecal coliform from non-point sources (upstream farms and agriculture) in the watershed. The relatively high levels of fecal coliform are indicative of the presence of fecal material and thus excess organic matter in the stream and watershed. Excess organic matter can lead to depleted oxygen concentrations which can be detrimental or deadly to aquatic organisms. Beneficial flushing of excess organic material and fecal coliform, and therefore dissolved oxygen concentrations, are heavily influenced by hydrology which could be impacted by dam releases and operations (e.g., minimum flows).

Based on the above information, the Service requests that the FERC consider requiring that Oglethorpe Power Corporation fund water quality sensors (Specific Conductivity, Water Temperature, and Dissolved Oxygen) on United States Geological Survey (USGS) discharge gauge 02388320 (0.3 miles downstream of the project outflow) for the duration of the project license. These sensors would provide continuous real-time data that could be used by and OPC for a water quality study about the impact of project operations on water quality, as part of the relicensing process, and provide data that all resource agencies could use to determine habitat suitability for imperiled species. Such real-time continuous data is much better at accurately assessing water quality across various hydrological conditions and improve the ability to establish causal mechanisms influencing water quality, whereas instantaneous grab-type sampling is usually insufficient for such studies and is primarily dependent on the prevailing hydrological and weather conditions at the time of sampling.

Sincerely,

PETER

Digitally signed by PETER MAHOLLAND MAHOLLAND Date: 2022,05,13 13:42:46

Peter Maholland Acting Field Supervisor

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 11th day of August 2022.

/s/ Mealear Tauch

Mealear Tauch Van Ness Feldman, LLP 1050 Thomas Jefferson Street, NW Seventh Floor Washington, DC 20007 mzt@vnf.com

Document Content(s)	
P-2725 Responses to Agency Comments.pdf	1

Document Accession #: 20220811-5097 Filed Date: 08/11/2022

From: Jones, Craiq

Marcinek, Paula; Escobar, Anakela To: McCaslin, Tyler; Steven Layman Cc: Subject: RE: RMPSP fish meeting

Date: Thursday, August 11, 2022 12:54:08 PM

Attachments: image001.png

Will do, Paula. Best, ci

From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Thursday, August 11, 2022 12:53 PM

To: Jones, Craig <craig.jones@opc.com>; Escobar, Anakela <anakela.escobar@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: RMPSP fish meeting

External E-Mail

Thanks, Craig. Would you also invite Eric Bauer, FWS eric bauer@fws.gov, to the meeting. It will be helpful to have his input, especially since he has been onsite.

Best,

Paula Marcinek

Aquatic Biologist, Wildlife Conservation

Wildlife Resources Division

M: (404) 323-7751

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From: Jones, Craig <<u>craig.jones@opc.com</u>> **Sent:** Thursday, August 11, 2022 11:46 AM

To: Marcinek, Paula < <u>Paula.Marcinek@dnr.ga.gov</u>>; Escobar, Anakela

<anakela.escobar@dnr.ga.gov>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: RMPSP fish meeting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Paula and Ani,

Thanks again for the dates. Please hold Tuesday, 9/6 at 10:00 a.m. for a fish survey discussion. I will send a webex invite shortly.

Best,

ci

From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Tuesday, August 9, 2022 12:45 PM **To:** Jones, Craig < craig.jones@opc.com>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: RMPSP fish meeting

External E-Mail

That's right!

From: Jones, Craig < craig.jones@opc.com>
Sent: Tuesday, August 9, 2022 12:07 PM

To: Marcinek, Paula < <u>Paula.Marcinek@dnr.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: RMPSP fish meeting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Paula,

Good chatting with you as well. We will check dates and get back to you soon on a meeting date and time. I'm assuming anytime on those dates will work for you, at this time. Let me know if that's not right.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Monday, August 8, 2022 11:22 AM **To:** Jones, Craig < craig.jones@opc.com>

Subject: RMPSP fish meeting

External E-Mail

Hi Craig.

Thank you for chatting about the resource surveys this morning. Regarding discussion of the fish surveys, here are some potential dates to consider for the scheduling poll that are currently open for me and Ani Anakela.Escobar@dnr.ga.gov:

9/1, 9/6, 9/9, 9/12 (morning), 9/13, 9/14

Best,

Paula Marcinek

Aquatic Biologist, Wildlife Conservation

Wildlife Resources Division

M: (404) 323-7751

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From: Jones, Craig
To: Bauer, Eric F

Cc:McCaslin, Tyler; Steven LaymanSubject:Rocky Mountain Fish Survey DiscussionDate:Thursday, August 11, 2022 12:58:31 PM

Attachments: <u>image001.png</u>

Hi Eric,

We have a meeting set up with GDNR on 9/6 at 10:00 a.m. to discuss the fish survey. It makes sense that you're included in that meeting, and I will forward the webex invite to you. If that time doesn't work for you, please provide some alternative dates times between 9/6 and 9/14.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Shiley, Dennis
To: McCaslin, Tyler

Cc: Klein Schmidt Group (Kelly Kirven); Jones, Craig; Klein Schmidt Group (Steven Layman); Childers1, Richard;

Hakala, Jim

Subject: Re: Recreation Study Date Notifications
Date: Tuesday, August 16, 2022 6:12:10 PM

Attachments: <u>image001.png</u>

External E-Mail

Thanks for the note!

Sent from my Verizon, Samsung Galaxy smartphone

Get Outlook for Android

From: McCaslin, Tyler <tyler.mccaslin@opc.com> **Sent:** Tuesday, August 16, 2022 6:10:22 PM **To:** Shiley, Dennis <dennis.shiley@dnr.ga.gov>

Cc: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com>; Jones, Craig < craig.jones@opc.com>;

Steven Layman <Steven.Layman@Kleinschmidtgroup.com>; Childers1, Richard

<richard.childers1@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Subject: RE: Recreation Study Date Notifications

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Hey Dennis,

We are shifting the rec survey from Aug 25 to Aug 26 to accommodate some other study efforts. Just wanted to keep you in the loop.

-Tyler

From: McCaslin, Tyler

Sent: Monday, August 1, 2022 9:13 AM

To: 'Shiley, Dennis' <dennis.shiley@dnr.ga.gov>

Cc: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com>; Jones, Craig < craig.jones@opc.com>;

Steven Layman <Steven.Layman@Kleinschmidtgroup.com>; Childers1, Richard

<richard.childers1@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>

Subject: RE: Recreation Study Date Notifications

Hey Dennis,

Our upcoming recreation survey days will be Aug 7, Aug 25, Sept 1, Sept 30, Oct 1, and Oct 15.

We got a handful more campground surveys from the drop box during last week's survey as well.

Please let me know if you have any questions. Thanks!

-Tyler

From: Shiley, Dennis < dennis.shiley@dnr.ga.gov>

Sent: Thursday, June 30, 2022 11:32 AM **To:** McCaslin, Tyler < tyler.mccaslin@opc.com >

Cc: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com >; Jones, Craig < craig.jones@opc.com >;

Steven Layman < Steven.Layman@Kleinschmidtgroup.com>; Childers 1, Richard

<ri>crichard.childers1@dnr.ga.gov>; Hakala, Jim < Jim.Hakala@dnr.ga.gov></ri>

Subject: Re: Recreation Study Date Notifications

External E-Mail

are already a couple surveys in your drop box it looks like.

They will have a busy day on the 2nd!

Have a great holiday

Dennis

Sent from my Verizon, Samsung Galaxy smartphone

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From: McCaslin, Tyler < tyler.mccaslin@opc.com > Sent: Thursday, June 30, 2022 11:26:13 AM
To: Shiley, Dennis < dennis.shiley@dnr.ga.gov >

Cc: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com>; Jones, Craig < craig.jones@opc.com>;

Steven Layman < Steven.Layman@Kleinschmidtgroup.com>; Childers1, Richard

<<u>richard.childers1@dnr.ga.gov</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>

Subject: RE: Recreation Study Date Notifications

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Hey Dennis,

Our next planned recreation survey dates will be this Sat July 2, Wed July 27, Sun Aug 7, and Thu Aug 25.

Please let us know if you have any questions. We will be checking our campground survey drop box for completed forms and refreshing the blank surveys as needed this weekend.

-Tyler

From: McCaslin, Tyler

Sent: Tuesday, June 21, 2022 2:49 PM

To: 'Childers1, Richard' < <u>richard.childers1@dnr.ga.gov</u>>

Cc: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com >; 'Shiley, Dennis'

<dennis.shiley@dnr.ga.gov>; Jones, Craig <craig.jones@opc.com>; 'Steven Layman'

<Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: Recreation Study Date Notifications

Thank you so much, Richard. I will pass that information along and scope out that area when we are on site on Friday.

I will also keep Dennis' suggestion in mind regarding having an informational sign with the drop box explaining the survey due to the use of online check-in and the hosts having so many responsibilities already.

Thank you both for your excellent suggestions, and we appreciate your support. Please feel free to reach out if you have any ongoing questions or concerns. We will be collecting and refreshing the survey form inventory at least biweekly (or more often if needed).

-Tyler

From: Childers1, Richard < richard.childers1@dnr.ga.gov>

Sent: Tuesday, June 21, 2022 2:41 PM

To: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Recreation Study Date Notifications

External E-Mail

Campground entrance probably isn't the best location. We would recommend putting it next to our information kiosk on the opposite end from the parking pass machine. I'm open to suggestions, but that is probably going to be one of the better options. People can see it as they get their parking pass and then hopefully deposit the survey on their way out.

From: McCaslin, Tyler < tyler.mccaslin@opc.com>

Sent: Tuesday, June 21, 2022 1:37 PM

To: Childers1, Richard < richard.childers1@dnr.ga.gov>; Shiley, Dennis < dennis.shiley@dnr.ga.gov>

Subject: RE: Recreation Study Date Notifications

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Hey Richard and Dennis,

Just wanted to check in on this regarding the placement of the drop box on Friday afternoon and y'all's thoughts on seeing if the campground host would be interested in mentioning the survey during check-in at the campground.

Thanks!

-Tyler

From: McCaslin, Tyler

Sent: Thursday, June 16, 2022 1:16 PM

To: 'Childers1, Richard' < richard.childers1@dnr.ga.gov>

Subject: RE: Recreation Study Date Notifications

That's perfectly fine. Thanks, Richard!

Our initial thoughts were near the campground entrance/check-in area. We even thought letting the campground host know about it to encourage visitors to check out the survey might be helpful.

-Tyler

From: Childers1, Richard < richard.childers1@dnr.ga.gov>

Sent: Thursday, June 16, 2022 12:54 PM

To: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Recreation Study Date Notifications

External E-Mail

I should probably get with Dennis to see about locations for the drop boxes. Is it ok if I get you some recommendations on the 21st? I can figure something out if you need it before then.

Richard Childers

Fisheries Technician 3/Assistant Manager Rocky Mountain Recreation and Public Fishing Area

Wildlife Resources Division

(404) 987-4403

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From: McCaslin, Tyler <tyler.mccaslin@opc.com>

Sent: Wednesday, June 15, 2022 12:23 PM

To: Childers1, Richard < <u>richard.childers1@dnr.ga.gov</u>>

Cc: Shiley, Dennis <<u>dennis.shiley@dnr.ga.gov</u>>; Hakala, Jim <<u>Jim.Hakala@dnr.ga.gov</u>>; Jones, Craig

<<u>craig.jones@opc.com</u>>

Subject: RE: Recreation Study Date Notifications

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks, Richard!

We will have some contractors on site 6/24 to setup the drop box for the recreation survey sheets and will be surveying on 6/25 and 7/2 to start.

If you have any recommendations for where we might best place the drop box, we would greatly appreciate it.

-Tyler

From: Childers1, Richard < richard.childers1@dnr.ga.gov>

Sent: Wednesday, June 15, 2022 12:11 PM **To:** McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** RE: Recreation Study Date Notifications

External E-Mail

My email is <u>richard.childers1@dnr.ga.gov</u>. I worked for EPD 10 years ago, so I guess they needed to add the 1 at the end of my name once I came back to DNR.

Cheers,

Richard Childers

Fisheries Technician 3/Assistant Manager Rocky Mountain Recreation and Public Fishing Area

Wildlife Resources Division

(404) 987-4403

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From: Hakala, Jim < <u>Jim.Hakala@dnr.ga.gov</u>>
Sent: Wednesday, June 15, 2022 11:59 AM
To: McCaslin, Tyler < <u>tyler.mccaslin@opc.com</u>>

Cc: Childers1, Richard < <u>richard.childers1@dnr.ga.gov</u>> **Subject:** Re: Recreation Study Date Notifications

Tyler,

I've cc'd Richard, so you can reach out to him directly regarding the start of the recreation survey and where best to place the passive campground survey sheets.

Jim

Sent from my iPhone

On Jun 15, 2022, at 11:28 AM, McCaslin, Tyler <tvler.mccaslin@opc.com > wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hey Jim,

Craig let me know that he gave you a heads up about our upcoming recreation study weekend dates and asked that I loop in Dennis and Richard (since Dennis is out this week). Is Richard's email richard.childers@dnr.ga.gov? I was having a hard time finding him on any publicly available contact lists.

Tyler McCaslin, PhD

Environmental Specialist Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084



From: <u>McCaslin, Tyler</u>

To: <u>"kponcho@coushatta.org"</u>

Subject: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. 2725) Relicensing - Responses to

Agency Comments on the Pre-Application Document and Proposed Studies

Date: Wednesday, August 17, 2022 5:44:00 PM

Attachments: Rocky Mountain Responses to Agency Comments.pdf

mage001.png

On August 11, 2022, Oglethorpe Power filed with the Federal Energy Regulatory Commission (FERC) the attached responses to agency comments on the Pre-Application Document and proposed resource studies for the Rocky Mountain Pumped Storage Hydroelectric Project. We are in the process of finalizing our study plans based on these comments and ongoing consultation and will upload them to our relicensing website in the near future.

Please reach out with any questions related to these comments or the Rocky Mountain relicensing process.

Best regards,

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084



 From:
 McCaslin, Tyler

 To:
 "er@dca.ga.gov"

Subject: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. 2725) Relicensing - Responses to

Agency Comments on the Pre-Application Document and Proposed Studies

Date: Wednesday, August 17, 2022 5:43:00 PM

Attachments: Rocky Mountain Responses to Agency Comments.pdf

mage001.png

On August 11, 2022, Oglethorpe Power filed with the Federal Energy Regulatory Commission (FERC) the attached responses to agency comments on the Pre-Application Document and proposed resource studies for the Rocky Mountain Pumped Storage Hydroelectric Project. We are in the process of finalizing our study plans based on these comments and ongoing consultation and will upload them to our relicensing website in the near future.

Please reach out with any questions related to these comments or the Rocky Mountain relicensing process.

Best regards,

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084



From: <u>McCaslin, Tyler</u>

To: "jennifer.dixon@dca.ga.gov"

Subject: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. 2725) Relicensing - Responses to

Agency Comments on the Pre-Application Document and Proposed Studies

Date: Wednesday, August 17, 2022 4:33:00 PM

Attachments: Rocky Mountain Responses to Agency Comments.pdf

mage001.png

On August 11, 2022, Oglethorpe Power filed with the Federal Energy Regulatory Commission (FERC) the attached responses to agency comments on the Pre-Application Document and proposed resource studies for the Rocky Mountain Pumped Storage Hydroelectric Project. We are in the process of finalizing our study plans based on these comments and ongoing consultation and will upload them to our relicensing website in the near future.

Please reach out with any questions related to these comments or the Rocky Mountain relicensing process.

Best regards,

Tyler McCaslin, PhD

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084



From: Clark, Maria To: McCaslin, Tyler

Subject: RE: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. 2725) Relicensing - Responses to

Agency Comments on the Pre-Application Document and Proposed Studies

Thursday, August 18, 2022 7:51:04 AM Date:

Attachments: image001.png

Importance: High

External E-Mail

Good morning Tyler,

Please remove from your list of contacts from the EPA:

- 1. Ntale Kajumba
- 2. John Blevins

Thank you for your assistance. Please let me know if you have any questions. Best.

NEPA Section — Region 4 Strategic Programs Office

U.S. Environmental Protection Agency

Maria R. Clark

61 Forsyth Street, SW Atlanta, GA 30303 Phone# 404-567-9513

From: McCaslin, Tyler <tyler.mccaslin@opc.com> Sent: Wednesday, August 17, 2022 4:30 PM **To:** McCaslin, Tyler <tyler.mccaslin@opc.com>

Cc: Jones, Craig <craig.jones@opc.com>; Steven Layman

<Steven.Layman@kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com> Subject: Rocky Mountain Pumped Storage Hydroelectric Project (FERC Project No. 2725) Relicensing

- Responses to Agency Comments on the Pre-Application Document and Proposed Studies

On August 11, 2022, Oglethorpe Power filed with the Federal Energy Regulatory Commission (FERC) the attached responses to agency comments on the Pre-Application Document and proposed resource studies for the Rocky Mountain Pumped Storage Hydroelectric Project. We are in the process of finalizing our study plans based on these comments and ongoing consultation and will upload them to our relicensing website in the near future.

Please reach out with any questions related to these comments or the Rocky Mountain relicensing process.

Best regards,

Environmental Specialist Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084





Final Study Plans

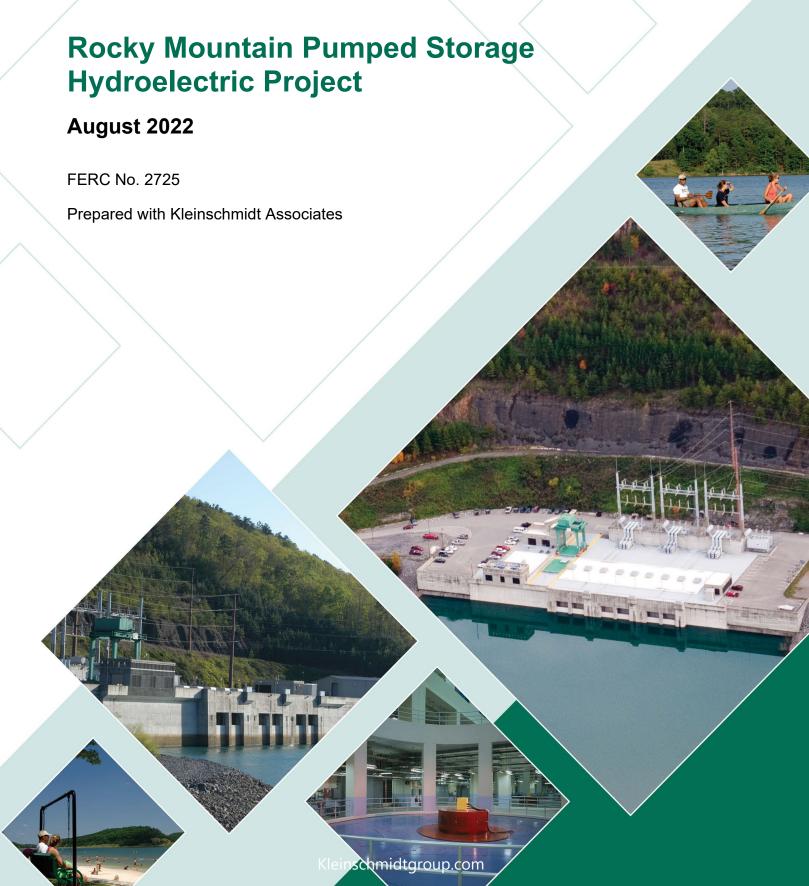


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1.0 INTRODUCTION

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC) has prepared this document to present its study plans to support Federal Energy Regulatory Commission (FERC) relicensing of the Rocky Mountain Pumped Storage Hydroelectric Project (FERC No. 2725) (Rocky Mountain Project, or Project). The 904-megawatt Rocky Mountain Project consists of a 221-acre Upper Reservoir, a 600-acre Lower Reservoir, two Auxiliary Pools, and a powerhouse on Heath Creek in Floyd County, Georgia (Figure 1). The Project also includes a substation located 1.5 miles from the powerhouse and three 230kV transmission lines comprising a total of 1.5 miles, known as the Primary Transmission Line. As described in the Pre-Application Document (PAD) filed with FERC on December 10, 2021, OPC will be proposing in the license application that both the substation and the transmission lines be removed as Project works. OPC is not proposing to add capacity or make any major modifications to the Rocky Mountain Project under the new license. The Project does not occupy any federal lands. The original license expires December 31, 2026.

Subsequent to filing the PAD with FERC on December 10, 2021, OPC received FERC approval to use the Traditional Licensing Process (TLP) on January 26, 2022. OPC held a virtual Joint Meeting and Site Visit with interested stakeholders on March 16, 2022. In the Joint Meeting, OPC presented its proposed plans to conduct resource studies to address information gaps and meet the information needs for FERC's National Environmental Policy Act review of the license application. The Georgia Department of Natural Resources (GDNR) Wildlife Resources Division and the U.S. Fish and Wildlife Service (FWS) subsequently provided comments on the PAD and proposed study plans on May 12-13, 2022. OPC consulted with GDNR, FWS, the GDNR Environmental Protection Division (GEPD), and the Georgia Department of Community Affairs Historic Preservation Division (GHPD) on the proposed study plans in meetings and email communications from April through July 2022.

The study plans set forth in this document address or incorporate recommendations made by GDNR, FWS, GEPD, and GHPD pertaining to the recreation use analysis, water quality monitoring, fish and mussel survey site selection and mussel survey methods, and the cultural resources assessment.

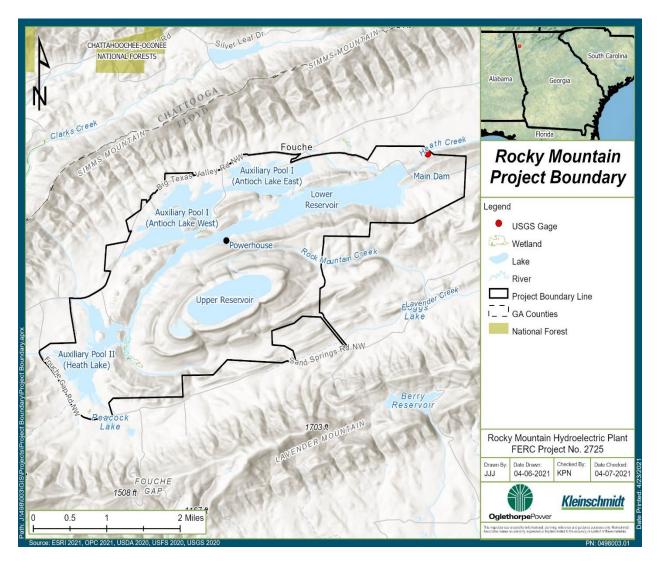


Figure 1 Project Boundary Map

2.0 WATER QUALITIY ASSESSMENT

OPC will conduct a study characterizing existing water quality at the Rocky Mountain Project. The study will supplement the existing robust water quality data set available for the Project, as summarized in the PAD, and will be accomplished through a combination of new water quality monitoring at representative locations within the project boundary and compilation and analysis of existing water quality data.

2.1 Objectives

The specific objectives of this study are to:

- Characterize existing water quality in the Rocky Mountain study area.
- Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application.

2.2 Study Area

The proposed study area includes the Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary.

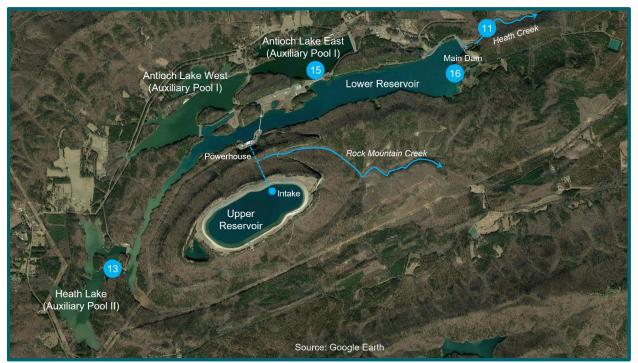
2.3 Methodology

OPC's approach to the water quality assessment consists of the following study elements:

- Compile and analyze water quality data collected by OPC and GDNR at the Project between 1996 and 2020.
- Conduct one year of monthly water quality monitoring at four historic stations within the project boundary to characterize current conditions.

Monthly water quality monitoring will be conducted from June 2022 through May 2023 at historic stations RM11 (Heath Creek downstream of Main Dam), RM13 (Heath Lake), RM15 (Antioch Lake East), and RM16 (Lower Reservoir near the Main Dam) (Figure 2). The Upper Reservoir is not included in monitoring because it exchanges a large volume of water daily with the Lower Reservoir, both reservoirs fluctuate substantially and remain well mixed throughout the water column, and Lower Reservoir water quality is therefore also representative of Upper Reservoir water quality. Rock Mountain Creek is not included

August 2022 Project Control No. 0498003.01 in monitoring because there is no outlet from the Upper Reservoir to the creek and previous water quality sampling in Rock Mountain Creek has indicated that water quality of the creek is unaffected by project operation.



Blue circles indicate station numbers RM11, RM13, RM15, and RM16.

Figure 2 Proposed Water Quality Monitoring Stations in 2022-2023

Monthly water quality monitoring will include *in-situ* measurements of water temperature, dissolved oxygen (DO) concentration, pH, specific conductance, and turbidity using an electronic multi-parameter water quality measurement sonde. Measurements will be taken at a depth of 1 meter (m) at the impoundment stations (RM13, RM15, and RM16) and at mid-depth in Heath Creek (RM11). The water quality measurement sonde will be calibrated prior to each monitoring event.

During each monthly event, grab samples of water also will be collected at 1-m depth at the impoundment stations and at mid-depth in Heath Creek and analyzed in the laboratory for 5-day biological oxygen demand, ammonia¹, inorganic nitrogen (nitratenitrite), total Kjeldahl nitrogen, ortho-phosphate, and total phosphorus.

-

¹ Per recommendation of GEPD, ammonia will also be sampled at one additional location on Heath Creek, downstream and outside of the project boundary, once in summer 2022 to provide data for screening ammonia toxicity as a potential stressor to aquatic organisms in the downstream reach.

For the Heath Creek monitoring location, to be responsive to FWS's request for continuous monitoring and address GDNR's comment about minimizing the effects of temporal variation of monthly water quality data collection, OPC will conduct continuous monitoring of DO concentration and water temperature in Heath Creek downstream of the Main Dam (RM11) for one year beginning in June 2022. A dissolved oxygen data logger will be placed in the stream within the direct influence of releases from the Main Dam and where the channel cross section is relatively uniform in depth and the water well mixed. Placement of the data logger will be determined in consultation with GDNR and based on field measurements of DO within the reach between the Main Dam and USGS gage during the initial water quality monitoring event. The data logger will record DO and water temperature every hour and will be downloaded and the sensor maintained on a routine basis throughout the monitoring period.

A Water Quality Assessment Report will be prepared and provided to stakeholders with the Draft License Application (DLA) for review and comment. The monitoring results and historic water quality data will be summarized in tables and figures and analyzed with respect to applicable state water quality criteria and any evident water quality trends related to project operations and maintenance or project-related recreation.

Additionally, OPC will evaluate the results of the Water Quality Assessment in conjunction with the results of the fish and mussel surveys conducted for the Aquatic Resources Study in consultation with GDNR and FWS to determine whether a second year of water quality monitoring is warranted.

2.4 Schedule

The Water Quality Assessment study will be completed according to the milestones in Table 1.

Table 1 Schedule for Water Quality Assessment

Activity	Date or Deadline
Begin data compilation and monthly sampling	June 2022
Complete one year of monthly sampling	May 2023
Prepare study report	December 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.0 AQUATIC RESOURCES STUDY

OPC proposes to conduct a study characterizing the existing communities of fish and mussels in Heath Creek downstream of the Project for evaluating the effects of continued project operation on aquatic habitat downstream. The study will be accomplished through a fish community survey and a freshwater mussel survey, to be conducted in 2022.

3.1 Objectives

The specific objectives of this study are to:

- Characterize existing communities of fish and mussels in Heath Creek downstream of the Project.
- Develop aquatic resources information sufficient for analyzing the effects of continued project operation on aquatic habitat downstream of the project in the license application, including assessing the presence/absence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails.

3.2 Study Area

The study area includes Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek, a reach of approximately 5 miles (Figure 3).

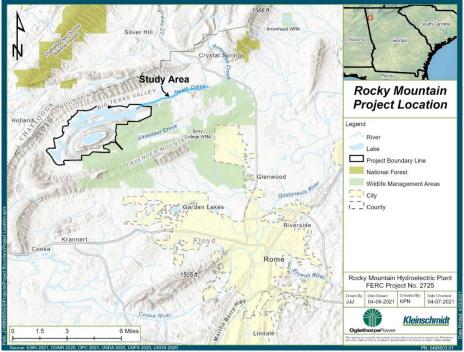


Figure 3 Heath Creek Study Area for Aquatic Resources Study

3.3 Methodology

OPC's approach to the aquatic resources study includes the following key elements.

Fish Community Survey

Consistent with GDNR recommendations fish community sampling will be conducted at two representative locations on Heath Creek in 2022, including a station near the U.S. Geological Survey (USGS) Gage No. 02388320 (Heath Creek near Armuchee, GA) within the project boundary and a station previously surveyed by the GDNR Stream Team in 2001-2002 located about 2.5 miles downstream of the Main Dam at Texas Valley Road. Each station will be surveyed once during the period June-September 2022 following the GDNR's Standard Operating Procedures (SOP) for Conducting Biomonitoring on Fish Communities in Wadeable Streams in Georgia (GDNR 2020a).

Prior to sampling, reconnaissance and stream measurements will take place at each sampling to station calculate mean stream width (MSW). Reach of stream to be sampled will be 35 times the MSW. Additionally, MSW will be used to determine the number of backpack electrofishing units (BPEFs) and netters required to efficiently sample the area in accordance with the referenced SOP.

The fisheries sampling will take place in an upstream direction starting at the downstream end of the sampling reach. Collected fish will be identified to species, enumerated, weighed, and returned to the stream. The fish community data will be analyzed using the multi-metric Index of Biotic Integrity (IBI) to evaluate fish community health compared to reference conditions within the Ridge and Valley ecoregion (GDNR 2020b). The IBI integrates characteristics of the fish community, population, and individuals to assess fish health and biologic integrity. Metrics are based on species richness, evenness, feeding guilds, habitat use, species sensitivity or tolerance to pollutants. Total IBI scores will fall within one of five integrity classes (excellent, good, fair, poor, or very poor) and will be compared to the IBI scores obtained by the GDNR Stream Team for Heath Creek in 2001-2002.

Freshwater Mussel Survey

A survey for mussels and aquatic snails will be conducted in representative habitats in Heath Creek in 2022 to characterize the occurrence, distribution, relative abundance, and species richness of the native freshwater mollusk community. The survey will include habitats with potential to support RTE species of mussels and snails (mollusks). Based on known element of occurrence records (historic or present) and species range and habitat data, ten state and/or federally protected mollusk species, and one mussel species under federal review for listing, potentially occur in the project vicinity, including several species with historic occurrence records in the Armuchee Creek watershed, and therefore, potential to occur in Heath Creek (Table 2).

Table 2 Rare, Threatened, and Endangered Freshwater Mollusk Species with Known Records of Occurrence in Floyd County

Scientific Name	Common Name	Federal Status ^a	Georgia Status ^b
Mussels:			
Elliptio arca	Alabama spike		E
Hamiota altilis	Finelined pocketbook	LT	Т
Medionidus acutissimus	Alabama moccasinshell	LT	Е
Medionidus parvulus	Coosa moccasinshell	LE	Е
Pleurobema decisum	Southern clubshell	LE	E
Pleurobema georgianum	Southern pigtoe	LE	E
Ptychobranchus foremanianus	Rayed kidneyshell	LE	E
Ptychobranchus greenii	Triangular kidneyshell	LE	
Villosa umbrans	Coosa creekshell	UR	R
Snails:			
Leptoxis foremani	Interrupted rocksnail	LE	E
Pleurocera showalteri	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

The survey will be conducted by a team of biologists experienced in the collection of freshwater mussels and snails led by a malacologist who brings extensive knowledge of the mollusk fauna of the Coosa River basin in Georgia, under the authority of scientific collecting permits issued by GDNR and FWS.

^b Georgia state status: E = endangered; T = threatened; R = rare.

The search reach on Heath will extend from the Main Dam downstream approximately 5 stream miles to the confluence with Little Armuchee Creek. Using snorkeling gear, surveyors will begin at the downstream end of the reach and work upstream bank to bank. All live mussels and snails will be identified to species and returned to the substrate where they were found. Substrate characteristics along the study reach will be documented. All mussels will be measured to the nearest millimeter (long axis). The survey will take place in June-September 2022.

At least one voucher specimen of each mussel and snail species found fresh dead will be retained and deposited at a regional malacological collection. Live mussels and snails will be photographed and returned to the river bottom where they were found. FWS and GDNR will be notified within 24 hours if a federally protected species is found in the survey area. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected, if any, will be shared only with FWS and GDNR and will be filed as privileged (non-public) information.

Reporting

An Aquatic Resources Study Report will be prepared that characterizes aquatic resources present in Heath Creek downstream of the Project. A separate freshwater mussel survey report will be appended to the study report, and the mussel survey findings will be summarized in the main study report. The fish and mussel survey results will be presented in tables and figures, as appropriate, and analyzed with respect to species occurrence, species richness, relative abundance, biotic integrity, and other community attributes. The study results will be used in the DLA to analyze the effects of continued project operation on aquatic resources downstream of the Project.

3.4 Schedule

The Aquatic Resources Study will be completed according to the milestones in Table 3.

Table 3 Schedule for Aquatic Resources Study

Activity	Date or Deadline
Conduct fish community survey	June-September 2022
Conduct mussel survey	June-September 2022
Prepare study report	January 2023
File study report with DLA for stakeholder review	Estimated February 2024

3.5 References

GDNR (Georgia Department of Natural Resources). 2020a. Part I: Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Stream in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

GDNR (Georgia Department of Natural Resources). 2020b. Part IV: Scoring Criteria for the Index of Biotic Integrity to Monitor Fish Communities in Wadeable Stream in the Coosa and Tennessee Drainage Basin of the Ridge and Valley Ecoregion in Georgia. GDNR, Wildlife Resources Division, Fisheries Management Section.

4.0 TERRESTRIAL AND WETLAND RESOURCES SURVEY

OPC will conduct a study to characterize existing terrestrial wildlife and botanical resources and wetlands and riparian resources at the Rocky Mountain Project through a field reconnaissance survey and the use of existing information and data. This study plan combines wildlife and botanical resources as described in Section 4.5 of the PAD; wetlands, riparian, and littoral habitat as described in Section 4.6 of the PAD; and RTE terrestrial plants and wildlife as described in Section 4.7 of the PAD into a single consolidated survey effort.

4.1 Objectives

The specific objectives of this study are to:

- Describe terrestrial wildlife and botanical resources occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Describe floodplain, wetlands, and riparian habitats occurring in the study area, including lists of representative plant and animal species that use representative habitats and identifying invasive species in these habitats.
- Prepare a map of the principal vegetation community types in the project boundary, including wetlands.
- Identify potentially suitable habitat for RTE species of plants and animals in the project boundary.
- Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and terrestrial RTE species of plants and wildlife in the license application.

4.2 Study Area

The proposed study area includes the project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek.

4.3 Methodology

OPC's approach to the terrestrial and wetland resources survey consists of the following study elements.

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Review of Existing Information

Descriptions of existing terrestrial and wetland resources in the study area (i.e., wildlife and botanical resources; wetlands, riparian, and littoral habitat; and terrestrial RTE plant and wildlife species) will be based on review of existing information summarized in the PAD, including but not limited to the following sources:

- Terrestrial Management Plan for the Rocky Mountain Project (GDNR 2013)
- The Natural Communities of Georgia (Edwards et al. 2013)
- Georgia State Wildlife Action Plan (GDNR 2015)
- GDNR's online Georgia Biodiversity Portal
- USFWS Environmental Conservation Online System
- Field Guide to the Rare Plants of Georgia (Chafin 2007)
- Georgia Exotic Pest Plant Council's list of non-native plants in Georgia
- National Audubon Society's Christmas bird count historical data
- USFWS National Wetlands Inventory (NWI) data
- USGS topography
- Google Earth aerial imagery

Field Reconnaissance Survey

A field reconnaissance survey of the study area, concentrating mainly on uplands and wetlands around the project waters and project recreation areas will be conducted in appropriate seasons to observe representative terrestrial and wetland vegetive communities and associated wildlife habitat. Field surveys will be conducted in summer 2022 to inventory wildlife and botanical resources in the major vegetative community types identified in the Terrestrial Management Plan for the Project (GDNR 2013), and in fall 2022 and spring 2023 to survey for RTE plant species flowering in those seasons.

Teams of two biologists/ecologists will visually assess upland, wetland, and riparian communities, by boat along the shorelines of the Lower Reservoir and Auxiliary Pools and by pedestrian surveys of project recreation areas and floodplains of Heath Creek and other streams, wetlands, and potentially unique or sensitive habitats. During the survey, vegetation community types encountered will be described and field notes recorded as

August 2022 Project Control No. 0498003.01 to dominant species, presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation habitat types. Unique habitats, or areas where sensitive species might occur, will be GPS-located. Where encountered, field teams will also identify wildlife species and their spoor (scat, tracks, scents, burrows, etc.).

The RTE species list provided in the PAD will be updated prior to the field survey and utilized as the foundation for visually searching for and identifying potentially suitable habitat for RTE species within the study area. Should RTE species be encountered, species/population information, habitat attributes, GPS location, and other relevant data will be recorded so that findings data can be transmitted to the appropriate agency and documented for the study report. Due to the sensitivity of RTE species occurrence data, specific locations of RTE species detected will be shared only with the agencies having jurisdiction over the resource and will be filed as privileged (non-public) information.

Reporting

A combined Terrestrial and Wetland Resources Survey Report will be prepared and provided to stakeholders with the DLA for review and comment. The survey findings will be summarized in tables and figures. The study report will also provide a vegetation community map, including wetlands. The study results will be used in the DLA to analyze the effects of continued project operation and maintenance and project-related recreation on terrestrial and wetland resources and RTE species of plants and wildlife.

4.4 Schedule

The Terrestrial and Wetland Resources Survey will be completed according to the milestones in Table 4.

Table 4 Schedule for Terrestrial and Wetland Resources Survey

Activity	Date or Deadline
Conduct field reconneissance surveys	June-September 2022;
Conduct field reconnaissance surveys	April 2023
Prepare study report	August 2023
File study report with DLA for stakeholder review	Estimated February 2024

4.5 References

- Chafin, L.G. 2007. Field Guide to the rare plants of Georgia. State Botanical Garden of Georgia and University of Georgia Press, Athens.
- Edwards, L., J. Ambrose, and L. K. Kirkman. 2013. The natural communities of Georgia. Photographs by Hugh and Carol Nourse. The University of Georgia Press, Athens, Georgia.
- Georgia Department of Natural Resources (GDNR). 2013. Terrestrial Management Plan for Rocky Mountain Hydroelectric Plant and Recreation & Public Fishing Area. Spring 2013.
- Georgia Department of Natural Resources (GDNR). 2015. State Wildlife Action Plan. Wildlife Resources Division. Social Circle, Georgia.

5.0 RECREATION USE ANALYSIS

OPC will conduct a study characterizing existing recreational use at the Rocky Mountain Project for evaluating the potential effects of continued project operation and maintenance on recreation resources in the license application. This study will be accomplished through the compilation and analysis of abundant existing recreational use information and field activities to inventory and describe existing facilities and survey recreation users at the Project.

5.1 Objectives

The specific objectives of this study are to:

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project.
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application.

5.2 Study Area

The study area includes the Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). The Rocky Mountain PFA contains Auxiliary Pool I (Antioch Lake East and West), Auxiliary Pool II (Heath Lake), and other recreation areas (e.g., hiking and biking trails) within the project boundary. Auxiliary Pools I and II are shown in Figure 1.

5.3 Methodology

A complete inventory of existing recreation facilities will be conducted. Data will be collected on the type, number, and size of facilities (restrooms, parking areas, boat ramps, picnic shelters and tables, campsites, trails, etc.) at the Rocky Mountain PFA. The general condition of all facilities will be noted during the inventory. Any facilities that qualify as barrier-free will be identified.

As recommended by GDNR, OPC will conduct on-site recreation surveys to collect data on public use characteristics and user satisfaction levels. Recreation users at the Project will be surveyed on 15 days between June 2022 and May 2023². The purpose of these onsite surveys will be to assess trends in recreation user composition, primary recreation uses, user satisfaction, and adequacy of existing facilities; annual recreation use will be estimated using GDNR traffic count data, as described below. Specifically, a field crew will conduct surveys on 9 days between June and October 2022 to capture summer and early fall use and again on 6 days between March and May 2023 to capture spring use. Conducting the surveys in these seasons, which typically receive the highest amounts of use (summer months for boating and swimming, spring months for fishing) will maximize the rate of return on surveys collected versus time spent in the field. Surveys will be conducted on a mix of weekdays, non-peak weekends, and peak weekends (or holidays), with an emphasis towards non-peak weekends, using the survey form developed in consultation with GDNR (Figure 4). A general schedule is provided in Table 5. A twoperson field crew will be on site to conduct surveys for a total of 8 hours, generally between the hours of 8:00 AM and 4:00 PM. During the spring survey events, the field crew will be on site generally between the hours of 7:00 AM and 3:00 PM to interview morning anglers. Each member of the field crew will be stationed at one of three locations to conduct surveys: the main entrance ("Main"), the beach entrance ("Beach"), or the Heath Lake entrance ("Heath"). Surveys will only be conducted at the Heath entrance during the first 10 days of each month since Heath Lake is only open for fishing during this time.

Table 5 General Survey Schedule

Survey #	Month, Year	Day Type	Entrances
1	June 2022	Weekend	Main, Beach
2	July 2022	Holiday	Main, Beach, Heath
3	July 2022	Weekday	Main, Beach
4	August 2022	Weekend	Main, Beach, Heath
5	August 2022	Weekday	Main, Beach
6	September 2022	Weekend	Main, Beach, Heath
7	September 2022	Weekday	Main, Beach
8	October 2022	Weekend	Main, Beach, Heath
9	October 2022	Weekend	Main, Beach

² During discussions with GDNR on April 22, 2022, GDNR indicated they may be able to provide an intern to conduct additional surveys at the Rocky Mountain PFA. If GDNR is able to employ an intern to conduct surveys, the survey schedule will be revised.

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Survey #	Month, Year	Day Type	Entrances
10	March 2023	Weekend	Main, Beach, Heath
11	March 2023	Weekday	Main, Beach
12	April 2023	Weekend	Main, Beach, Heath
13	April 2023	Weekend	Main, Beach
14	May 2023	Weekday	Main, Beach, Heath
15	May 2023	Weekend	Main, Beach

OPC's recreation survey methodology and level of effort are similar to those used by GDNR in a 2006-2007 recreation survey of the Rocky Mountain PFA, and they are consistent with generally accepted practice in relicensing recreation studies. As such, the recreation survey is expected to yield statistically valid and sufficiently robust data for representing recreation users and their satisfaction levels with the PFA facilities, and for comparison with the 2006-2007 survey results.

In addition to in-person surveys, a survey drop-box will be installed at the campground entrance/check-in area. Campers will be able to complete a survey during their visit and leave it in the drop box upon leaving. The survey drop-box will be installed from June through October 2022 to capture peak use in the summer and early fall. The campground survey will use the survey form developed in consultation with GDNR (Figure 5).

Current recreational use will be determined using existing data and information collected by GDNR, including attendance records, traffic count data, and staff observations; these sources of data were used to develop the 2015 Form 80 recreation report filed with FERC. It is OPC's understanding that GDNR continuously collects traffic count data using counter devices installed at the three Rocky Mountain PFA entrances. OPC will use one full year of traffic count data provided by GDNR to estimate recreational use at the Rocky Mountain PFA in 2022 for comparison to recreational use estimates for prior years, as summarized in the PAD. The reported estimate of recreation use will be presented in "recreation days." FERC defines a recreation day as one visit by a person to a development for purposes of recreation during any 24-hour period. An estimate of recreational use during the peak recreation season (April-September) and non-peak recreation season (October-March) will be calculated. The weekday, weekend, and peak weekend (holiday) average recreation days during the peak recreation season will be calculated.

Estimated projections of future recreation use at the Project will be developed using the average annual increase in population growth over the past 10 years for Floyd County, Georgia, as reported by the U.S. Census Bureau. The increase in population will be applied to the annual use estimates for the Project to determine a future recreation use estimate. This information will be considered when determining future recreation needs at the Project.

The need for recreation and site development or modifications of existing recreation resources will be assessed based on the inventory, condition assessment results, recreation surveys, and future recreation use estimates. The needs assessment will focus on the existing condition and user opinions of recreation sites, the presence of "barrier-free" facilities at recreation sites, and the ability of sites to meet current and anticipated future recreation demand. The need for new recreation sites and/or facilities, as well as improvements to existing recreation amenities, will be determined through assessment of the information collected and consultation with stakeholders, particularly GDNR.

A Recreational Use Analysis Report will be prepared and provided to stakeholders with the DLA for review and comment. The study report will characterize existing recreation use and evaluate the need for recreational access or facility improvements.

5.4 Schedule

The Recreational Use Analysis will be completed according to the milestones in Table 6.

Table 6 Schedule for Recreational Use Analysis

Activity	Date or Deadline		
Conduct surveys	June-October 2022, March- May 2023		
Analyze data	June-July 2023		
Prepare study report	September 2023		
File study report with DLA for stakeholder review	Estimated February 2024		

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Location: Mair	n Beach	Heath	Da	te:			Tir	ne:	
Interviewer:									
Vehicle Type: Vehicle w/ Trailer Vehicle w/o Trailer RV/Camper									
1. What is your count	ty and state of reside	nce?	Co	unty:				State:	
2. What is your zip co	ode?								
3. How many people	(including you) are in	n your grou	up toda	y?	peo	ple			
4. What is your age?		18-24		_25-34	_	35-4	14	45-54	55+
5. If you came with o			s? (che	ck all tha	t apply)			
Children (Infants		(13-17)		Adults	(18-55) _	Se	enior Adults (o	ver 55)
6. How did you hear	about the area?								
Friend/Relative		Social N							Other
7. How many times (i		-		-		e last 3	0 day	s?	
8. What is the primar	y reason for your vis	it today? (check a	ll that ap	ply)				
Boat Fishing	Picnicking			king				Canoeing/kaya	
Bank Fishing	Swimming			king				Vildlife viewin	<u> </u>
Camping	Hunting		Ple	easure Bo	oating		S	horeline relax	ation
Other:									
9. If you came to fish	· · · · · · · · · · · · · · · · · · ·	ou rate you	ur fishin	g experi	ence?				
Very Good (5)	Good (4)		ir (3)		Pc	or (2)		Very I	Poor (1)
10. If you came to fish today, where did you fish?									
Antioch Lake EastAntioch Lake West Heath Lake									
11. If you came to hunt today, how would you rate your hunting experience?									
Very Good (5)	Good (4)		ir (3)			or (2)			Poor (1)
12. Please rate the qu						se one	for ea		
Parking:	Very Good (5)		d (4)		r (3)	Po	or (2)		Poor (1)
Boat Ramp:	Very Good (5)		d (4)		r (3)		or (2)		Poor (1)
Docks:	Very Good (5)	Goo	d (4)	Faii	r (3)	Po	or (2)	Very	Poor (1)
Restrooms:	Very Good (5)	God	od (4)	Faiı	r (3)	Po	or (2)	Very	Poor (1)
Bank Fishing:	Very Good (5)	Goo	d (4)	Faii	r (3)	P0	oor (2)	Very	Poor (1)
Beach:	Very Good (5)	Goo	d (4)	Faiı	r (3)	Po	or (2)	Very	Poor (1)
Picnic Areas:	Very Good (5)	Goo	d (4)	Faii	r (3)	P0	oor (2)	Very	Poor (1)
Campsites:	Very Good (5)	Goo	d (4)	Faii	r (3)	P0	oor (2)	Very	Poor (1)
Trails:	Very Good (5)	Goo	d (4)	Faii	r (3)	P0	oor (2)	Very	Poor (1)
Cleanliness:	Very Good (5)	Goo	d (4)	Faii	r (3)	P0	oor (2)	Very	Poor (1)
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other comments or									
suggestions.									

Figure 4 Recreation Survey Form

Oglethorpe Power Corporation Rocky Mountain Pumped Storage Project Recreation Use Survey

Oglethorpe Power Corporation is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFA), user satisfaction with existing recreation facilities, and whether facility improvements may be needed. Please take a few minutes to answer some questions about your visit today. Thank you for your participation.

Date:				Time:						
1. What is your county and state of residence?			County: State:							
2. What is your zip	code?									
2. How many peopl	e (including you)	are in your g	roup	today?			people			
3. What is your age	?	18-24		25-34			45-54	55+		
4. If you came with		their age gro	oups?	(check	all th	at a	pply)			
Children (Infar	nts-12)Yo	uth (13-17)		_Adults	(18-	55)		Senio	r Adults (over 55)
5. How would you r	ate the online bo	ooking experi	ence	for cam	ping	rese	rvatior	ıs?		
Very Good (5)	Good (4)	Fair	(3)			Pool	· (2)		Very	Poor (1)
6. What activities a	re you participat	ng in while c	ampii	ng? (che	ck al	ll tha	t apply)		
Boat Fishing	Picnicking			Hiking				Canoeing/kayaking		
Bank Fishing	Swimming			Biking			Wildlife Viewing			
Hunting	Pleasure Bo	ating	Shoreline relaxation			Other (list below):				
7. While camping a	7. While camping at Rocky Mountain PFA, are you staying in:									
Tent	RV		Tent/RV Combo			Group Ca	amp			
8. Please rate the q	uality of the exis	ting camping	facili	ties. (ch	oose	one	descri	otion	for each)	
Campsite:	Very Good (5)Good	(4)	Fai	r (3)		Poor (2)		Very	/ Poor (1)
Playground:	Very Good (5)Good	(4)	Fai	r (3)		Poo	· (2)	Very	/ Poor (1)
Restrooms:	Very Good (5)Good	l (4)	Fai	r (3)		Poor (2)		2)Very Poor (1)	
Cleanliness:	Very Good ()Good (4)Fair (3)Poor (2			or (2)Very Poor (1)		/ Poor (1)			
Bank Fishing:	Very Good (Good (5)Good (4)Fair (3)Poor (2)Very Poor (1)			/ Poor (1)					
9. List any specific improvements you would like to see at Rocky Mountain PFA Campground, and any										
other comments or suggestions.										
							-			

Figure 5 Campground User Survey Form

6.0 CULTURAL RESOURCES ASSESSMENT

OPC will conduct a cultural resources assessment of the Rocky Mountain Project to identify and evaluate archaeological and historical resources within the Area of Potential Effect (APE). All work will be conducted in accordance with the *Georgia Standards and Guidelines for Archaeological Investigations* (Revised 2019) and *Georgia Historic Resources Survey Manual* (2017). The study will consist of review of available information on known archaeological and historical sites in the project boundary, including previous extensive cultural resource assessments summarized in the PAD; an archaeological field survey to update/refine site boundaries and to determine the National Register of Historic Places (NRHP) eligibility status of one site, and an architectural field survey to evaluate the NRHP eligibility of project facilities.

6.1 Objectives

The goal of this study is to identify and document historic properties located within the APE that could be affected by continued operation and maintenance of the Project. This information will be used to modify the Project's existing Cultural Resources Management Plan (CRMP) into a new Historic Properties Management Plan (HPMP)

The specific objectives of this study are to:

- Identify and summarize known historic properties at the Project within the APE.
- Conduct an archaeological field survey for a site (GP-FL-14/CRFL 14) specified in the 2020 Cultural Resources Monitoring Report (TRC) provided in the PAD to define the site boundaries and evaluate its NRHP eligibility status.
- Refine the site boundaries and update the site forms for three previously evaluated archaeological sites (9FL80, 9FL138, and 9FL148).
- Conduct an architectural field survey to evaluate the NRHP eligibility status of project facilities, which will turn 50 years of age during the new license term.
- Evaluate the potential for effects on historic resources from continued project operation and maintenance and project-related recreation.

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6.2 Study Area

The study area will be the APE, which has been identified and delineated in consultation with GHPD, which is Georgia's state historic preservation office (SHPO). The APE is defined as the area within the FERC project boundary, encompassing the project facilities, Rocky Mountain PFA, and 5,000 acres of land and water.

6.3 Methodology

OPC will contract the services of a professional cultural resources consultant who will use currently accepted practices as defined under Section 106 of the Historic Preservation Act of 1966 (as amended) and implementing regulations (36 CFR 800) for the identification and evaluation of historic properties.

Agency Consultation

OPC has consulted with GHPD to define the project APE and to address overall study goals and methods. OPC will prepare map(s) showing the APE as the area within the project boundary and will document GHPD concurrence with the APE.

Background Literature Research

An archaeological site file and literature review will be conducted at the research and collections facility of the University of Georgia and at Georgia's Archaeological Site File records maintained online on the Georgia Natural, Archaeological, and Historic Geographic Information System (GNAHRGIS). The review will include the *Revised Cultural Resources Management Plan for the Rocky Mountain Project, Floyd County, Georgia* (Garrow and Cleveland 1997), which provides a synthesis of the previous extensive cultural resource assessments completed at the Project and summarized in the PAD, the findings of archaeological monitoring conducted at the Project in 2020 (Appendix F of the PAD, privileged information), and existing reports and documents available from OPC.

Architectural research will also include historical research on the Rocky Mountain Project that places it in the context of large-scale hydroelectric power generation, water control features, and recreation in Georgia and the Southeast United States. Material collected will include secondary histories, primary sources, historic maps, photographs, drawings, and reports related to the planning and construction of the Project, as well as documents related to operation of the facility and management of the resources within the APE. The

historical context will be illustrated, fully referenced, and used to evaluate the Project's eligibility for listing in the NRHP.

Archaeological Survey

In November 2020, TRC Environmental Corporation (TRC) conducted archaeological monitoring of six sites previously recommended for preservation and monitoring, with the goal of locating and visually assessing the condition of each site (Table 7). All six sites were located and shown to be well maintained and protected, with no evidence of looting, natural destruction, erosion caused by project operations, or vandalism.

Table 7 Archaeological Properties Recommended in the Rocky Mountain Project Cultural Resources Management Plan for Preservation

Site			
Identification	Site Name	Description	NRHP Eligibility
9FL80	The Fouche Mill Property	Grist mill, sawmill, fishing club	Unknown ^b
9FL106	The Reed/Milam Property	19 th C. log cabin/homestead	Recommended
9FL108 ^a	The Cargle Property	19 th -20 th C. residence and store	Unknown ^b
9FL138	The Fisher House	19 th C. homestead	Recommended
9FL148	The Fouche/Hardy Farm	19 th -20 th C. plantation and	Unknown ^b
		farmstead	
GP-FL-14/	The Clarence Montgomery	20 th C. tenant house	Unknown
CRFL14	Farm		

^a The Cargle/Cordle Store, formerly located on the Cargle Property, was moved from its original location to the Rocky Mountain Visitors Center and preserved for public education.

Based on observations from TRC's 2020 monitoring, OPC will conduct the following additional archaeological field survey activities at four of the sites:

- Site 9FL80 (The Fouche Mill Property) update the site boundaries to include the Fishing Club (see below) and send an updated site form and GIS information to SHPO. Because the site has been thoroughly investigated, no additional shovel testing will be conducted at the site.
- Site 9FL138 (The Fisher House) refine the boundaries at the periphery of this NRHP-eligible site, which TRC found to be mis-plotted on SHPO maps, based on the extent of the aboveground features. A new boundary and updated site form

^b Previously assessed as not eligible; unknown by current standards.

will be recorded and submitted to SHPO. Since the site has been thoroughly evaluated, is eligible for the NRHP, and the CRMP for the Project recommends avoidance, no shovel testing will be conducted (see below).

- Site 9FL148 (The Fouche/Hardy Farm) based on observation of additional structural debris to the north of the original site boundary, refine and update the site boundaries by conducting a systematic pedestrian survey in this northern area along transects spaced no more than 15 meters (m) apart. The new site boundary will be recorded via GPS and updated site form will be recorded and submitted to SHPO.
- Site GP-FL-14/CRFL14 (The Clarence Montgomery Farm) define the site boundaries by conducting shovel testing and evaluate its NRHP eligibility status. The site has not been formally evaluated and has been avoided (see below). Shovel testing will be conducted in a radial pattern at 15-m intervals to delineate the site boundary. Based on the results of the shovel testing and the aboveground features observed, the site will be formally recorded and submitted to SHPO.

Site 9FL80 (The Fouche Mill Property)

Originally identified in 1972 on the banks of Heath Creek, the site consists of a saw and grist mill that was originally constructed in 1878. In 1925, a house known as "the Fouche Mill Fishing Club" was built for the mill workers to use on the weekends on the slope above the mill. By 1927, the mill dam was no longer functional, and the mill was abandoned in 1933. The site was first recorded in 1972. In 1983, archaeological testing conducted at the site identified features of the mill works and the Fishing Club. After the test excavations the Mill portion of the site was inundated with the formation of the lake. The Fishing Club portion of the site is located upslope from the mill. It was subject to Data Recovery Excavations in 1984; however, its location is not included on the site boundary depicted on GNAHRGIS. The site was recommended for monitoring in the CRMP and has been preserved in place. OPC will update the site boundary and official site form in the GNAHRGIS database to include the Fishing Camp. The site has been thoroughly investigated and recommended for avoidance in the CRMP. Therefore, no additional shovel testing will be conducted at the site.

Site 9FL138 (The Fisher House)

Archaeological remains at the site consist of two fallen chimneys, four stone piers, and a partially filled cellar that marked the location of a residence. John F. Fisher was the first resident of Floyd County to purchase the property that contains 9FL138, and he bought it on October 22, 1849. Reports indicate the house was in ruins and abandoned by 1910. The site was evaluated through shovel testing and the excavation of 5 x 5-foot and 5 x 10-foot test units and recommended eligible for the NRHP. The site was recommended for avoidance and has been preserved in accordance with the CRMP. A site visit by TRC determined that the mapped location recorded on GNAHRGIS is mis-plotted. OPC will refine the boundaries of Site 9FL138 based on the extent of the aboveground features. Since the site is eligible for the NRHP and the CRMP recommends that minimal disturbance take place, no shovel testing will be conducted. The goal of the work will be to define the correct location of the site and update the site form and maps for submittal to SHPO.

Site 9FL148 (The Fouche/Hardy Farm)

Site 9FL148, is a large farm complex that dates from the mid-nineteenth to the late twentieth century. It was first identified during the 1972 survey, when the structure termed the "Fouche Homestead" was designated (9FL77). Fourteen standing structures were identified in association with the Fouche/Hardy farm during the 1978 survey conducted prior to the construction of the Rocky Mountain Project and the site was given its current site number. The Fouche/Hardy farm dates to 1859 with structures being added to the property into the mid-twentieth century. In 1997, archaeological data recovery at the site noted that all the structures were in ruins, but the portion of the property recommended for preservation retained some research potential. The site has been preserved in place in accordance with the CRMP.

During the 2020 monitoring of the Fouche/Hardy farm, additional structural debris was observed to the north of the original site boundary. Since the site is being treated as eligible for the NRHP, limited disturbance is recommended. OPC will conduct a systematic pedestrian survey limited to the area north of the previously mapped boundary of the site where structural debris was observed. This survey will be conducted along transects spaced no more than 15 m apart. The new site boundary will be recorded via GPS and an updated site form will be submitted to SHPO.

Identified as Cultural Resource CRFL14 on some project maps, Site GP-FL-14 was recorded by Georgia Power employees. It has not been formally evaluated for the NRHP. In 1983, it was noted that the site consisted of a house ruin, a standing log structure, several collapsed wood frame outbuildings, and a scattering of trash. The house ruin is reported to be the former home of Clarence Montgomery, a Black tenant on the Hardy Property. The date of construction of the house is undetermined. The house is not shown on the 1895 or the 1904 USGS map but is shown on the 1917 soil map of the county. The house is specifically mentioned in a deed from the Hardy heirs to R. F. Hardy dated December 30, 1958. Artifacts recovered from the site in 1983 dated to the twentieth century with many appearing "modern." The site is considered unassessed and has been avoided.

In order to define the boundaries of Site GP-FL-14/CRFL14, OPC will delineate the site boundary with a radial pattern of shovel tests excavated at 15-m intervals. The site will be evaluated as to its NRHP eligibility and formally recorded. An official state site number will be obtained. TRC will provide recommendations for avoidance based on the results of the delineation.

Architectural Survey

The project facilities will be photo-documented, including the Upper Reservoir, Lower Reservoir, Auxiliary Pools, powerhouse, dams, penstocks, substation, and transmission lines. Recreational facilities at the Auxiliary Pools will also be documented. Views will be taken inside (when possible) and outside all buildings and engineering structures in order to document current conditions and to illustrate the Project's historic features for the purposes of assessing its potential significance. A plan map of the facility will be prepared showing the relationship of the different components to one another.

Reporting

A Cultural Resources Assessment Report will be prepared and provided to participants with the DLA for review and comment. The study report will identify and document the historic properties located within the APE that could be affected by continued operation and maintenance of the Project.

August 2022 Project Control No. 0498003.01

6.4 Schedule

The Cultural Resources Assessment will be completed according to the milestones in Table 8.

Table 8 Schedule for Cultural Resources Assessment

Activity	Date or Deadline
Identify APE	July 2022
Conduct literature review	July-August 2022
Conduct archaeological survey	August-October 2022
Conduct architectural survey	August-October 2022
Prepare study report	March 2023
File study report with DLA for stakeholder review	Estimated February 2024

Meeting Summary Rocky Mountain Relicensing Trispot Darter Survey

Date and Time: Tuesday, September 6, 2022, 10:00-10:45 am

Location: Virtual Meeting (Webex)

Participants:

Eric Bauer, U.S. Fish and Wildlife Service (USFWS)
Paula Marcinek, Georgia Department of Natural Resources (GDNR)
Ani Escobar, GDNR
Craig Jones, Oglethorpe Power Corporation (OPC)
Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

The purpose of the meeting was to follow up on USFWS' question about the Trispot Darter and the potential need for a species-specific survey at the Rocky Mountain Project. The federally threatened species is known to occur in several other tributaries to the Oostanaula River. Discussions centered around the upstream migratory, staging, and winter breeding seasons of the species, the best period for sampling breeding adults being late January to late February, characteristics of the species' spawning habitat (presence of vegetation, leaf litter, root wads), effective sampling methods (backpack electrofishing and seining), and the desirability of repeating the sampling event separated by at least a week. USFWS and GDNR recommended that OPC conduct a winter survey for breeding Trispot Darters in channels of the small tributary system that enters Heath Creek below the Main Dam and upstream of the U.S. Geological Survey gage.

Telephone Memo

To: Public Files
From: Dustin Wilson
Date: September 7, 2022
Dockets: P-2725-075

Project: Rocky Mountain Pumped Storage Hydroelectric Project

Subject: Consultation with Tribes for the Rocky Mountain Pumped Storage

Hydroelectric Project No. 2725-075

On April 8, 2021, Dustin Wilson, staff of the Division of Hydropower Licensing with the Federal Energy Regulatory Commission (Commission) issued a letter initiating Tribal consultation for the relicensing process for the Rocky Mountain Pumped Storage Hydroelectric Project No. 2725 (Rocky Mountain Project). Mr. Wilson followed up with the addressed Tribes via telephone on May 19, 2021, June 16, 2021, and June 28, 2021 to determine if any would be interested in participating in consultation for the Rocky Mountain Project. Mr. Turner Hunt of the Muscogee (Creek) Nation stated that there are no likely concerns on June 16, 2021. Ms. Elizabeth Toombs of the Cherokee Nation responded on June 16, 2021 and expressed interest and consultation for the project. Mr. Wilson provided her with information regarding the project. On August 23, 2022, Mr. Wilson followed up with the Alabama-Quassarte Tribal Town, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Kialegee Tribal Town, Thlopthlocco Tribal Town, Poarch Band of Creeks, United Keetoowah Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Alabama-Coushatta Tribe of Texas, and the Seminole Nation of Oklahoma. No responses were received.

From: Jones, Craig
To: Marcinek, Paula

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: RE: GADNR Botany suggestions for RMPSP Date: Thursday, October 27, 2022 2:10:38 PM

Attachments: <u>image002.png</u>

Hi Paula,

Thanks for forwarding the comments. We will review and reach out if we have questions.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Thursday, October 20, 2022 11:01 AM **To:** Jones, Craig <craig.jones@opc.com>

Subject: GADNR Botany suggestions for RMPSP

External E-Mail

Hi Craig.

Sorry these comments are coming late. I honestly haven't had time to read through them, so decided to forward as is.

Anything your team can incorporate for the remainder of the surveys, would be great. Let me know if you have questions or want to discuss.

Best, Paula

From: Milly, Gemma < gemma.milly@dnr.ga.gov>

Sent: Monday, August 8, 2022 12:02 PM

To: Marcinek, Paula < Paula. Marcinek@dnr.ga.gov >; Kruse, Lisa < Lisa. Kruse@dnr.ga.gov >

Subject: Re: Rock Mtn

Comments attached.

Gemma

Gemma Milly, Botanist Mobile: 470-493-4419

Wildlife Conservation Section Wildlife Resources Division

A division of the GEORGIA DEPARTMENT OF NATURAL RESOURCES

General outline for Land Study Plans:

Describe history of land use and management (e.g. timbering and burning).

- Utilize historic aerials to map historical land use.
- Document and map past burns.

Document current plant communities.

- Perform gridded or meandering surveys to observe and delineate plant communities.
- Measure plant species composition and structure by performing botanical inventory plots (0.1
 hectare) in each large community. Follow NatureServe conventions for naming and describing
 plant communities.
- Describe how historical land use has impacted the current plant communities.
- Survey for rare species. Obtain target species list from GADNR WCS Botany. Map, count, and voucher individuals at every population.
- Survey for invasive species. Obtain target species list from EDDMapS. Map, count, and voucher individuals at every population, and submit data to EDDMapS.

Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review.

Comments on: Oglethorpe Power. Draft Study Plans. Rocky Mountain Pumped Storage Hydroelectric Project. June 2022. FERC No. 2725. Prepared with Kleinschmidt Associates.

Provided by Gemma Milly, Botanist, Georgia DNR Wildlife Conservation Section. August 8th, 2022.

Chapter 4: Terrestrial and Wetlands Resource Survey

- 4.2 Study area. Please provide map. Should include entire PFA.
- 4.3 Methodology.

Review EDDMapS resources to identify invasive species in southeast

Inventory surveys should be conducted once in spring, once in summer, and once in fall, to have access to reproductive parts necessary for identification of all species present. Several rare species in the area (especially in genus Carex) will no longer be identifiable by July.

Define species to be surveyed. Will you be surveying nonvascular plants? All vascular plants including grasses, sedges, and rushes? Including submersed aquatic plants? Only flowering plants? We would expect a full vascular inventory, and nonvascular plants would be ideal.

Plant community types should be measured structurally as well as for dominant species composition. Perform full botanical inventory plots (0.1 hectare) in each large community, and describe structural composition (height classes and percent foliar cover) per NatureServe standards.

Obtain a target rare species list from GADNR Botany.

In addition to specific location information for rare species. All rare species data must remain confidential, including even the presence of any given species on the property.

Survey for invasive species. Obtain target species list from EDDMapS. Map, count, and voucher individuals at every population, and submit data to EDDMapS.

Provide all GPS survey tracks in the report to document survey effort.

Describe history of land use and management (e.g. timbering and burning). Utilize historic aerials to map historical land use. Document and map past burns.

Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review.

From: Jones, Craig
To: Marcinek, Paula

Cc: McCaslin, Tyler; Steven Layman

Subject: RE: GADNR Botany suggestions for RMPSP

Date: Wednesday, March 1, 2023 10:16:40 AM

Attachments: <u>image001.pnq</u>

image004.png

Hi Paula,

Thanks again for the comments on the Terrestrial and Wetland Resources Survey (TWRS) study plan. We have reviewed the comments from Gemma that you forwarded on October 20, 2022, many of which are already incorporated in our <u>final study plan</u>, and have put together the following responses to specifically address each comment raised.

Just to recap the TWRS study work from last year, we finalized the study plan on August 31, 2022, incorporating comments received to date from GDNR and the U.S. Fish and Wildlife Service. Field work for the study began in July 2022, as we were finalizing the study plan, and was performed consistent with the final study plan. As mentioned, many of WRD's comments are already addressed in the final study plan or will be addressed in the Draft License Application (DLA), which we plan to distribute by the end of this year or early next year.

The following are specific responses to your comments, indicating in most cases how WRD's comments have already been addressed. In those areas where the comments were not addressed in the final study plan, we indicate how they will be addressed in the DLA or, in some limited cases, why a different study methodology was chosen.

Chapter 4: Terrestrial and Wetlands Resource Survey

GDNR Comment:

"4.2 Study area. Please provide map. Should include entire PFA."

OPC response 1:

Figure 1 of the Final Study Plans document provides a map of the project boundary, which includes the entire Rocky Mountain Recreation and Public Fishing Area (Rocky Mountain PFA). As defined in Section 4.2, the study area includes the entire area within the project boundary.

4.3 Methodology.

GDNR Comment:

"Review EDDMapS resources to identify invasive species in southeast."

OPC Response 2:

Consistent with GDNR's comment, as listed among the existing information sources in Section 4.3, OPC has reviewed the Georgia Exotic Pest Plant Council's list of non-native plants in Georgia for the field surveys. This included reviewing the Early Detection and Distribution Mapping System (EDDMapS) for invasive plants and animals in Georgia.

GDNR Comment:

"Inventory surveys should be conducted once in spring, once in summer, and once in fall, to have access to reproductive parts necessary for identification of all species present. Several rare species in the area (especially in genus Carex) will no longer be identifiable by July."

OPC Response 3:

As described in Section 4.3 of the Final Study Plan, OPC agrees with the comment. The study methodology includes conducting field surveys in summer, fall, and spring. The summer survey was completed in July 2022, the fall survey was completed in September 2022, and

the spring survey is planned for April 2023.

GDNR Comment:

"Define species to be surveyed. Will you be surveying nonvascular plants? All vascular plants including grasses, sedges, and rushes? Including submersed aquatic plants? Only flowering plants? We would expect a full vascular inventory, and nonvascular plants would be ideal."

OPC Response 4:

Consistent with GDNR's comment, the species to be surveyed are defined in the Final Study Plan. The field surveys are targeting primarily vascular plants, including grasses, sedges, and rushes. Although nonvascular plants are not being targeted, when encountered they are being identified to the lowest taxonomic level practicable. Submersed aquatic plants will also be identified but none have been encountered in the summer and fall surveys.

GDNR Comment:

"Plant community types should be measured structurally as well as for dominant species composition. Perform full botanical inventory plots (0.1 hectare) in each large community, and describe structural composition (height classes and percent foliar cover) per NatureServe standards."

Response 5:

For background, as described in the Pre-Application Document (Section 4.5.1.1, Vegetation) and referred to in the Final Study Plans (Section 4.3), GDNR (2013) conducted a vegetative monitoring survey of the Rocky Mountain PFA in summer 2012 as part of the Terrestrial Management Plan for the Project. The vegetative monitoring survey was conducted to determine the natural community types, species composition, and characteristics of the management units of Rocky Mountain PFA's terrestrial/upland woodlands. GDNR monitored 138 randomly selected plots across the PFA for species composition and measured the plant community structurally to include tree basal area, canopy height, canopy density, ground vegetative cover, and tree size. GDNR used the NatureServe natural community types to describe the major vegetation community types within the PFA (i.e., the project boundary).

Consistent with GDNR's comment and as described in Section 4.3 of the Final Study Plans, OPC is conducting field surveys to inventory the dominant species in the major vegetative community types already identified and mapped by GDNR in the Terrestrial Manage Plan, as well as to describe the presence of invasive species, wetland community types, and littoral/submerged aquatic vegetation types. Each major community type is being characterized according to the dominant plant species within each stratum (overstory, midstory, herbaceous).

OPC believes the vegetative monitoring survey conducted in 2012 adequately describes the dominant species composition, and replicating the inventory will not provide additional baseline data regarding the dominant plant species. OPC's current study leverages GDNR's 2012 survey and will provide a sufficient update to existing data to inform the development of license requirements.

GDNR Comment:

"Obtain a target rare species list from GADNR Botany."

"In addition to specific location information for rare species. All rare species data must remain confidential, including even the presence of any given species on the property."

Response 6:

As listed among the existing information sources in Section 4.3, OPC has reviewed GDNR's online Georgia Biodiversity Portal for information on the potential occurrence of rare, threatened, and endangered (RTE) species within the project vicinity. As discussed in the study plan, specific locations of RTE species detected will be shared with only those state and federal agencies having jurisdiction over the resource and will be filed with the Federal Energy Regulatory Commission (FERC) as privileged (non-public) information. However,

because FERC has designated OPC as its non-federal representative for carrying out informal consultation pursuant to Section 7 of the Endangered Species Act, OPC must disclose in its study reports and the DLA whether any federally threatened and endangered species have been detected within the project boundary and, if so, which species.

GDNR Comment:

"Survey for invasive species. Obtain target species list from EDDMapS. Map, count, and voucher individuals at every population, and submit data to EDDMapS."

Response 7:

Consistent with GPC's comment, OPC will document invasive species occurrences encountered that occupy more than 10 percent of the cover in a given community, mark those locations, and identify the species. However, OPC's final study plan does not include collecting voucher specimens of invasive species or submitting their occurrence data to EDDMapS. The invasive species findings presented in the resource study report will be available for potential use by the EDDMapS program.

GDNR Comment:

"Provide all GPS survey tracks in the report to document survey effort."

Response 8:

OPC's survey team did not GPS-locate its survey tracks during the summer or fall surveys. However, the study report will sufficiently describe the survey effort consistent with generally acceptable survey practices by describing the number of survey days, number of surveyors, survey areas covered, and survey areas of greatest concentration. OPC believes this approach will adequately describe the effort.

GDNR Comment:

"Describe history of land use and management (e.g. timbering and burning). Utilize historic aerials to map historical land use. Document and map past burns."

Response 9:

OPC's final study plan does not include describing the history of land use management, using historic aerials to map historical land use, or documenting and mapping past burns. It's unclear how this data will inform a licensing decision by the FERC. OPC's DLA will describe existing land use and include a discussion of GDNR's land management recommendations to the extent they are described in GDNR's Terrestrial Management Plan for the various land management units, including forest thinning and prescribed burning.

GDNR Comment:

"Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review."

Response 10:

OPC's final study plan does not include a literature review of ecological needs and life history of plant communities and rare species stewardship. However, the information generated by the TWRS study will help inform future land management and applicable rare species stewardship decisions related to the new license term.

Thanks again for the comments, Paula, and please reach out with any questions after reviewing our responses.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig

Sent: Thursday, October 27, 2022 2:10 PM

To: 'Marcinek, Paula' <Paula.Marcinek@dnr.ga.gov>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: RE: GADNR Botany suggestions for RMPSP

Hi Paula,

Thanks for forwarding the comments. We will review and reach out if we have questions.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Marcinek, Paula [mailto:Paula.Marcinek@dnr.ga.gov]

Sent: Thursday, October 20, 2022 11:01 AM **To:** Jones, Craig <<u>craig.jones@opc.com</u>>

Subject: GADNR Botany suggestions for RMPSP

External E-Mail

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From: Milly, Gemma < gemma.milly@dnr.ga.gov>

Sent: Monday, August 8, 2022 12:02 PM

To: Marcinek, Paula < Paula. Marcinek@dnr.ga.gov >; Kruse, Lisa < Lisa. Kruse@dnr.ga.gov >

Subject: Re: Rock Mtn

Comments attached.

Gemma

Gemma Milly, Botanist Mobile: 470-493-4419

Wildlife Conservation Section Wildlife Resources Division

A division of the GEORGIA DEPARTMENT OF NATURAL RESOURCES

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Identify ecological needs for plant community and rare species stewardship based on ecological and life history literature review.

From: Sibley, Jackson
To: Kelly Kirven

Cc: <u>Hakala, Jim; Steven Layman</u>

Subject: RE: Rocky Mountain PFA - Traffic Counter Data

Date: Tuesday, March 7, 2023 8:06:13 AM

Kelly,

Below you will find the traffic count totals for CY2022:

Month (2022)	Total
January	4,882
February	9,863
March	7,594
April	13,510
May	20,534
June	33,686
July	23,353
August	11,693
September	10,129
October	8,564
November	7,753
December	4,679
Sum	156,240

Thank you,

Jackson Sibley Fisheries Biologist (706) 295-6102

Wildlife Resources Division
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From: Kelly Kirven < Kelly. Kirven@KleinschmidtGroup.com>

Sent: Friday, March 3, 2023 11:44 AM

To: Sibley, Jackson < Jackson. Sibley@dnr.ga.gov>

Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Steven Layman

<Steven.Layman@Kleinschmidtgroup.com>

Subject: Re: Rocky Mountain PFA - Traffic Counter Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jackson,

I appreciate the follow up. We do the same during our analysis. We account for a variety of assumptions and corrections, similar to the ones you mentioned, and detail these in our report for transparency. We are on the same page here!

Again, thanks for reaching out and we appreciate DNR providing this data. Have a great weekend!

Kelly

Get Outlook for iOS

From: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Sent: Friday, March 3, 2023 11:25:56 AM

To: Kelly Kirven < <u>Kelly.Kirven@KleinschmidtGroup.com</u>> **Cc:** Hakala, Jim < <u>Jim.Hakala@dnr.ga.gov</u>>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain PFA - Traffic Counter Data

Kelly,

I should have mentioned in our phone conversation, but I did want to make Kleinschmidt aware that traffic counter data in itself is not a reliable indicator of recreational facility use. To generate our attendance estimates (i.e. facility use), we apply several corrections and expansions to account for site-specific variables (e.g. subtraction of security gate traffic count from general traffic count, an expansion factor applied to vehicle counts to account for variation in vehicle occupancy, and higher expansions for group camp/campground use which are subtracted from total counts).

Apologies if you're already accounting for this statistically, but I thought it may be of value to you in the event you're able to apply DNR's attendance estimates in your RUA analyses in lieu of generating your own estimates from raw data.

Best,

Jackson Sibley
Fisheries Biologist
(706) 295-6102
Wildlife Resources Division
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From: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com>

Sent: Thursday, March 2, 2023 12:39 PM

To: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Cc: Hakala, Jim < <u>Jim. Hakala@dnr.ga.gov</u>>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain PFA - Traffic Counter Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks so much Jackson! If it's not too much trouble to dig up, the raw data would be great. We can include what you have below along with some additional analyses.

Kelly

Kelly Kirven

Section Manager - Terrestrial/Aquatics

Office: 803.462.5633

www.KleinschmidtGroup.com

From: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Sent: Thursday, March 2, 2023 9:58 AM

To: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com > Cc: Hakala, Jim < Jim.Hakala@dnr.ga.gov >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: RE: Rocky Mountain PFA - Traffic Counter Data

Good morning Kelly,

Glad to hear of the progress. Below you'll find a table of PFA attendance for CY22. These data represent pooled traffic counts which have been expanded to estimate total guest attendance for each month. Let me know if you prefer the raw counter data instead. I should be able to dig it up.

CY2022 Attendance

	A
Month	Attendance
JAN	7727
FEB	15371
MAR	14235
APR	25330
MAY	37325
JUN	56891
JUL	40433
AUG	20708
SEP	18414
OCT	16119
NOV	13441
DEC	7224

Total 273218

Best,

Jackson Sibley
Fisheries Biologist
(706) 295-6102
Wildlife Resources Division
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From: Kelly Kirven < <u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Sent: Thursday, March 2, 2023 9:15 AM

To: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Cc: Hakala, Jim < <u>Jim. Hakala@dnr.ga.gov</u>>; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>

Subject: Rocky Mountain PFA - Traffic Counter Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Jackson!

I know we have been out of touch for awhile, but I wanted to reach out to you regarding the ongoing recreation study at the Rocky Mountain PFA. We had a successful data collection season last year and are completing the remaining survey days this spring. While we are still collecting survey data, in the interest of time, we are starting to conduct preliminary data analysis and prepare a draft report. I was hoping you could provide the traffic counter data that DNR collected at the PFA in 2022. This data will provide great insight into use at the PFA.

I hope you are doing well and I look forward to hearing from you soon. Thanks!

Kelly

Kelly Kirven
Section Manager – Terrestrial/Aquatics
Kleinschmidt

Office: 803.462.5633 Cell: 423.747.2660

www.KleinschmidtGroup.com

 From:
 Bauer, Eric F

 To:
 Jones, Craig

 Cc:
 McCaslin, Tyler

Subject: Re: [EXTERNAL] Rocky Mountain Relicensing Next Steps

Date: Monday, April 10, 2023 4:02:38 PM

Attachments: <u>image001.png</u>

External E-Mail

No worries. That works for me, I accepted. See you then.

-Eric

Eric F. Bauer, PhD

(he/him)

Fish and Wildlife Biologist

Georgia Ecological Services

US Fish and Wildlife Service

RG Stephens, Jr. Federal Building

355 East Hancock Avenue, Room 320, Box 7

Athens, GA 30601

Office #: 706-613-9493

Georgia Ecological Services Website: https://www.fws.gov/office/georgia-ecological-services
Project Planning and Review Procedures: https://www.fws.gov/office/georgia-ecological-

services/project-planning-review

Direct Line: 706-208-7519

Teams: eric bauer@fws.gov (preferred)

From: Jones, Craig <craig.jones@opc.com>Sent: Monday, April 10, 2023 3:59 PMTo: Bauer, Eric F <eric_bauer@fws.gov>Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: RE: [EXTERNAL] Rocky Mountain Relicensing Next Steps

Hi Eric,

Apologies for the typo in the closing of that last email! You should have just received a meeting invite for Tuesday at 2:00. Please let me know if we need to adjust at all.

Best.

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig < craig.jones@opc.com>
Sent: Monday, April 10, 2023 11:48 AM
To: Bauer, Eric F < eric bauer@fws.gov>

Subject: Re: [EXTERNAL] Rocky Mountain Relicensing Next Steps

Thanks, Eric. I'll get back to you later today on a meeting time. Eat, cj

Sent from my iPhone. Please pardon the typsos.

On Apr 10, 2023, at 8:25 AM, Bauer, Eric F < eric bauer@fws.gov> wrote:

External E-Mail

Good morning Craig,

Apologies for not responding to this sooner, I was at a conference and then got sick from said conference. I'm free most of this week outside a few times (11-12 Tuesday, 11-1 Wednesday, 10-11:30 Thursday and 11-12 Friday). Please let me know if there's a time this week you'd like to schedule this meeting for. Next week I'll be at a workshop in New Orleans all week. Thanks in advance.

-Eric

Eric F. Bauer, PhD

(he/him)

Fish and Wildlife Biologist

Georgia Ecological Services

US Fish and Wildlife Service

RG Stephens, Jr. Federal Building

355 East Hancock Avenue, Room 320, Box 7

Athens, GA 30601

Office #: 706-613-9493

Georgia Ecological Services Website: https://www.fws.gov/office/georgia-ecological-services

Project Planning and Review Procedures: https://www.fws.gov/office/georgia-ecological-services/project-planning-review

Direct Line: 706-208-7519

Teams: <u>eric_bauer@fws.gov</u> (preferred)

From: Jones, Craig <<u>craig.jones@opc.com</u>>
Sent: Tuesday, April 4, 2023 11:06 AM
To: Bauer, Eric F <<u>eric_bauer@fws.gov</u>>
Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>

Subject: [EXTERNAL] Rocky Mountain Relicensing Next Steps

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Good Morning Eric,

I'm reaching out to set up a brief meeting to touch base at a high level on the status of the Rocky Mountain studies and discuss next steps. Would you have some availability over the next couple of weeks for a brief call, likely just 15-20 mins?

In particular, I'd like to update you on the preliminary findings for the mussel and tri-spot darter surveys. I'd also like to discuss the possibility of an informal consultation meeting with USFWS where we would walk through preliminary study findings in more detail.

My schedule is flexible this week and over the next couple of weeks. If you can provide a few options, I'm sure we can make one work.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image001.png>

From: McCaslin, Tyler

To: "MaryAnn Hawthorne", Elijah Huszagh

Cc: <u>Stacy Rieke</u>; <u>Jones, Craig</u>

Subject: RE: Rocky Mountain Relicensing Next Steps
Date: Thursday, April 13, 2023 11:27:03 AM

Attachments: <u>image001.png</u>

image002.png image003.png image004.png

Hi Mary Ann and Eli,

I have included links to our <u>Pre-Application Document</u> and <u>Final Study Plan</u> located on our <u>relicensing website</u>. We sent the privileged Appendix F of the PAD to <u>ER@dca.ga.gov</u> when the PAD was filed with FERC, but if you need a copy of it, I am happy to include it.

We are planning to file the Draft License Application mid-October 2023 and will be filing the Final License Application by December 31, 2024.

Please let us know if you have any questions or need additional information. We are happy to schedule a meeting to discuss.

Thanks and we look forward to working with you.

Tyler McCaslin, PhD

Environmental Specialist Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7723 Mobile: 404-576-9097 Email: tyler.mccaslin@opc.com Web: www.opc.com



From: Jones, Craig <craig.jones@opc.com> **Sent:** Monday, April 10, 2023 3:36 PM

To: 'MaryAnn Hawthorne' <MaryAnn.Hawthorne@dca.ga.gov>; Elijah Huszagh

<Elijah.Huszagh@dca.ga.gov>

Cc: Stacy Rieke <Stacy.Rieke@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: RE: Rocky Mountain Relicensing Next Steps

Hi Mary Ann and Eli,

Thanks for the follow up. We will provide you a list and links to information that has been made available, including our pre-application document and final study plan for cultural resources. At the same time, we'll also provide a schedule of when we will be filing the draft and final license applications. Although these documents have already been provided, we're happy to provide links to their location on our relicensing website.

It may be useful after reviewing this information to schedule an informal study update meeting so

you'll know what we will be including in the draft license application. We would certainly be open to that through the spring and summer.

I look forward to working with you as we move through the rest of the relicensing process.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: MaryAnn Hawthorne < MaryAnn.Hawthorne@dca.ga.gov>

Sent: Monday, April 10, 2023 9:35 AM

To: Elijah Huszagh < Elijah. Huszagh@dca.ga.gov >; Jones, Craig < craig.jones@opc.com >

Cc: Stacy Rieke < <u>Stacy.Rieke@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Next Steps

External E-Mail

Craig,

I agree with Eli. It would be especially helpful for me as well to read over any additional information for the relicensing and then reach back out with any questions after going over the information.

Mary Ann

MaryAnn Hawthorne

Environmental Review Historian Georgia Department of Community AffairsDirect +14046794938

MaryAnn.Hawthorne@dca.ga.gov



From: Elijah Huszagh < Elijah.Huszagh@dca.ga.gov>

Sent: Monday, April 10, 2023 9:25 AM **To:** Jones, Craig < craig.jones@opc.com>

Cc: MaryAnn Hawthorne < <u>MaryAnn.Hawthorne@dca.ga.gov</u>>; Stacy Rieke

<<u>Stacy.Rieke@dca.ga.gov</u>>

Subject: RE: Rocky Mountain Relicensing Next Steps

Good Morning Craig,

I believe it would be helpful for myself, and MaryAnn, if the updates for the Rocky Mountain Relicensing were sent over email. If questions arise after we look over the information, we can reach back out to you and schedule a call. Let me know if this works for you.

Thanks, Fli



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Elijah Huszagh, RPA Compliance Review Archaeologist Georgia Department of Community Affairs

Direct <u>404-486-6440</u> Elijah.Huszagh@dca.ga.gov

From: Jones, Craig < craig.jones@opc.com>
Sent: Tuesday, April 4, 2023 10:59 AM

To: Elijah Huszagh < <u>Elijah. Huszagh@dca.ga.gov</u>>; MaryAnn Hawthorne

<<u>MaryAnn.Hawthorne@dca.ga.gov</u>>; ER <<u>er@dca.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >

Subject: FW: Rocky Mountain Relicensing Next Steps

Good Morning Eli and Mary Ann,

I'm following up on the notification from Stacy regarding personnel changes. The meeting referenced below essentially is to keep HPD up to speed on where we are in the relicensing process, including study progress, opportunities for additional informal FERC consultation, and timing of submitting the draft license application for agency and other stakeholder review. Given the transition, I'm also happy to take some time for an orientation on our relicensing project, including overall process and schedule.

I'm envisioning a less than 30-minute phone call, but am happy to update you via email if you prefer. In terms of informal relicensing consultation, we would talk through at a preliminary level the work performed and study findings, in particular as they relate to what we will be providing in the draft license application (DLA). Basically, this would be a preview of the cultural information we will provide in the DLA, to help ensure our goal of early and ongoing informal consultation throughout the relicensing process.

Please let me know how you'd like to proceed. If you'd like to set up a brief call, please provide a few dates and times that would work in the next couple of weeks, and we will make one work.

Best regards,

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig

Sent: Tuesday, April 4, 2023 10:28 AM

To: Ayesha R. Tarek < Ayesha. Tarek@dca.ga.gov >; 'Santiago D. Martinez'

<<u>Santiago.Martinez@dca.ga.gov</u>>; ER <<u>er@dca.ga.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com > **Subject:** Rocky Mountain Relicensing Next Steps

Good Morning Ayesha and Santiago,

I'm reaching out to set up a brief meeting to touch base at a high level on the status of the Rocky Mountain cultural resources study and discuss next steps. Would you have some availability over the next couple of weeks for a brief call, likely just 10-15 mins.

My schedule is pretty flexible over the next couple of weeks. So if you give me a few options, I'm sure we can make one work.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: <u>Jones, Craig</u>

To: "Wei.Zeng@dnr.ga.gov"; "stephen.Wiedl@dnr.ga.gov"; "Elizabeth.Booth@dnr.ga.gov"

Cc: <u>McCaslin, Tyler</u>; <u>Steven Layman</u>

Subject: Rocky Mountain Relicensing WQ Study Update Meeting

Date: Friday, April 14, 2023 10:10:09 AM

Attachments: <u>image001.png</u>

Thanks again for the discussion and coordination yesterday. I have confirmed with Steve Layman that Thursday, May 18 or Friday, May19 will work for a preliminary review of the water quality study. We are still working on a time slot, but please plan on one of those two days for the meeting. As discussed, we will avoid May 18 at 3:00 and May 19 at 1:00.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Jones, Craig
To: "Hakala, Jim"

Cc: McCaslin, Tyler; Steven Layman; Kelly Kirven; Peacock, Clint; Sibley, Jackson; Marcinek, Paula; Escobar, Anakela;

Gregory, David

Subject: RE: Study Update Meeting with GDNR Date: Monday, April 17, 2023 10:52:46 AM

Attachments: <u>image001.png</u>

Hi Jim,

Thanks for the quick turnaround on possible dates. May 24th works well for us. Please hold that date, and I will send a meeting invite in the next couple of days.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



From: Hakala, Jim <Jim.Hakala@dnr.ga.gov> **Sent:** Monday, April 17, 2023 10:13 AM **To:** Jones, Craig <craig.jones@opc.com>

Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; 'Steven Layman'

<Steven.Layman@Kleinschmidtgroup.com>; 'Kelly Kirven' <Kelly.Kirven@KleinschmidtGroup.com>;
Peacock, Clint <Clint.Peacock@dnr.ga.gov>; Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; Marcinek,
Paula <Paula.Marcinek@dnr.ga.gov>; Escobar, Anakela <anakela.escobar@dnr.ga.gov>; Gregory,
David <David.Gregory@dnr.ga.gov>

Subject: RE: Study Update Meeting with GDNR

External E-Mail

Craig,

I polled our folks and May 18 and 24 would work for us (AM or PM). Let us know if one of those dates works for you.

Thanks,

Jim

Jim Hakala

Northwest Georgia Region Fisheries Supervisor

Wildlife Resources Division

(706) 295-6102

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From: Jones, Craig < craig.jones@opc.com>
Sent: Thursday, April 13, 2023 3:06 PM
To: Hakala, Jim < Jim. Hakala@dnr.ga.gov>

Cc: McCaslin, Tyler <<u>tyler.mccaslin@opc.com</u>>; 'Steven Layman'

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; 'Kelly Kirven' <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: Study Update Meeting with GDNR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jim,

I'm following up on our earlier phone discussion to set up a study update meeting. I think we can cover the information in an hour, but we may want to schedule $1\,\%$ hours to make sure we have plenty of time for a discussion.

Let me know what your and your team's availability is for the latter part of May or first part of June. Once I have dates/times, I'll coordinate with our team and send a Webex invite.

Best regards,

Craig

Craig A. Jones, PhD

Director, Environmental Policy
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com



Steven Layman

From: Will Pruitt

Sent: Wednesday, April 19, 2023 4:44 PM **To:** Bauer, Eric F; Marcinek, Paula

Cc: Jones, Craig; McCaslin, Tyler; Steven Layman

Subject: Trispot Darter Surveys at Rocky Mountain Pumped Storage

Hello Eric and Paula,

As requested, I have provided a succinct summary of the winter 2023 Trispot Darter (*Etheostoma trisella*) surveys at the Rocky Mountain Pumped Storage Facility. Please note as part of the relicensing process, a formal collecting report (with detailed methodology, habitat descriptions, collected species, water quality parameters, and photographs) will be provided at a later date. Further, to abide by the requirements of my Georgia and Federal collecting permit, an annual report to DNR and USFWS, respectively, will occur at the end of the collection year.

The Study Area (Figure 1) was divided into multiple sampling segments (Figure 2) based on habitat characteristics and applied survey methodology. Some segments were not sampled because of poor habitat or sampling conditions, excessive depth, limited access, or it was deemed by the lead biologist that further investigation was not warranted. The two survey events for Trispot Darter took place on February 7 and February 28, 2023. No Trispot Darters were collected or observed during either sampling event. Twenty-two non-target fish species were collected during the two sampling events. The sampling segments, and their approximate center are summarized below (Table 1). Please let me know if you have any questions regarding the Trispot Darter surveys. Thanks!

Table 1. Sampling Segments and Their Approximate Center Location.

Sampling Segment	Latitude	Longitude	
Channel A – Forested	34.371439°	-85.265294°	
Tributary 1	34.372127°	-85.266430°	
Channel A – Run	34.372211°	-85.271112°	
Channel A – Vegetation Bed	34.371427°	-85.274741°	
Dam A Seepage/Ditches	34.368445°	-85.274346°	
Tributary 2	34.369287°	-85.276322°	
Tributary 3	34.370047°	-85.278010°	

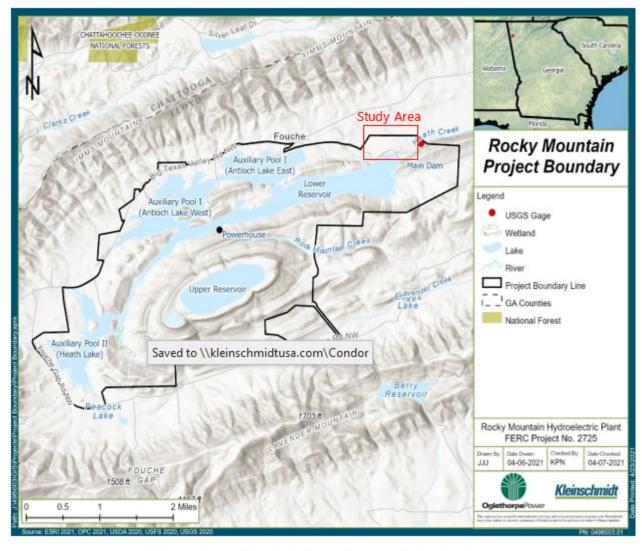


Figure 1 Project Boundary and Study Area

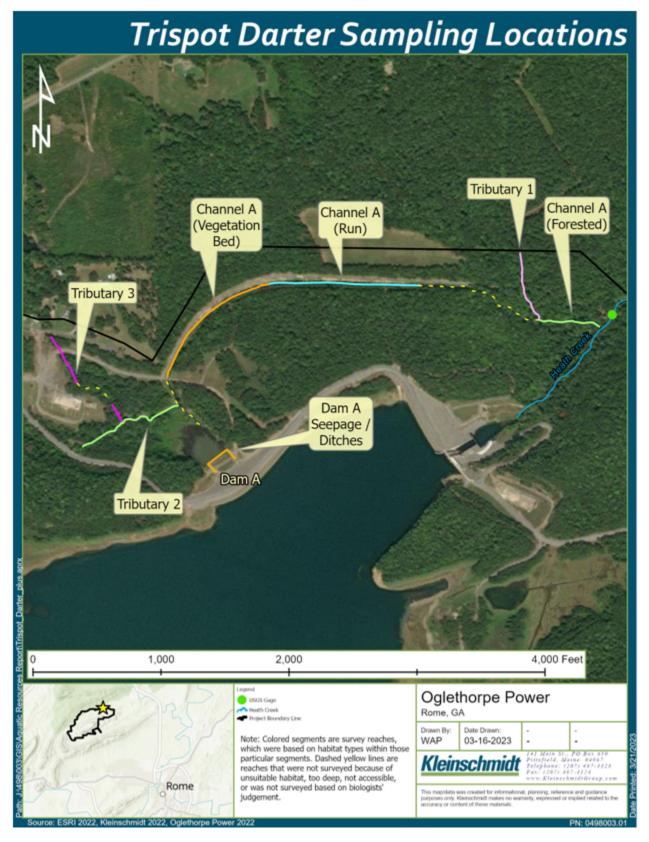


Figure 2 Survey Segments within the Study Area

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From: Jones, Craig
To: "Bauer, Eric F"

Cc: McCaslin, Tyler; Steven Layman; Kelly Kirven

Subject: RE: [EXTERNAL] Study Update and Preliminary Results Meeting

Date: Tuesday, May 2, 2023 2:12:40 PM

Hi Eric,

Apologies for the delay. June 9 will work best for us. I'll send an invite for 9^{th} at 10:00 a.m. I'm scheduling it for 1 ½ hours. I doubt it will go that long, but we'll have it if we need it. Let me know if you'd like me to adjust.

Best,

cj

From: Jones, Craig <craig.jones@opc.com> **Sent:** Wednesday, April 26, 2023 6:34 PM **To:** Bauer, Eric F <eric_bauer@fws.gov>

Subject: Re: [EXTERNAL] Study Update and Preliminary Results Meeting

Great. I'll check our schedules and send an invite tomorrow. Best, cj

Sent from my iPhone. Please pardon the typsos.

On Apr 26, 2023, at 4:04 PM, Bauer, Eric F < eric bauer@fws.gov > wrote:

External E-Mail

Craig,

I'm booked on the 24th and 25th as well as the 7th and 8th, but generally free outside of that.

-Eric

Eric F. Bauer, PhD

(he/him)

Fish and Wildlife Biologist

Georgia Ecological Services

US Fish and Wildlife Service

RG Stephens, Jr. Federal Building

355 East Hancock Avenue, Room 320, Box 7

Athens, GA 30601

Office #: 706-613-9493

Georgia Ecological Services Website: https://www.fws.gov/office/georgia-ecological-services
Project Planning and Review Procedures: https://www.fws.gov/office/georgia-ecological-services
Services/project-planning-review

Direct Line: 706-208-7519

Teams: <u>eric bauer@fws.gov</u> (preferred)

From: Jones, Craig <<u>craig.jones@opc.com</u>>
Sent: Wednesday, April 26, 2023 3:11 PM
To: Bauer, Eric F <<u>eric_bauer@fws.gov</u>>

Cc: McCaslin, Tyler < tyler.mccaslin@opc.com >; Steven Layman

<<u>Steven.Layman@Kleinschmidtgroup.com</u>>; 'Kelly Kirven' <<u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Subject: [EXTERNAL] Study Update and Preliminary Results Meeting

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Eric,

I'm reaching out to dial in on a few dates to schedule the study update meeting. Can you provide some options for the week of May 22 and June 5. If those weeks don't work well for you, we can push the meeting out further.

Best,

Craig

Craig A. Jones, PhD

Director, Environmental Policy Oglethorpe Power Corporation 2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 Mobile: 770-500-8912 Email: craig.jones@opc.com Web: www.opc.com

<image001.png>

From: <u>Jones, Craig</u>

To: "Bauer, Eric F"; McCaslin, Tyler; Barrows, Christina; Steven Layman; Kelly Kirven

Subject: Rocky Mountain Relicensing Study Update & Preliminary Results

Start: Friday, June 9, 2023 10:00:00 AM **End:** Friday, June 9, 2023 11:30:00 AM

Location: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer, mobile app or room device

Click here to join the meeting https://teams.microsoft.com/l/meetup-join/19%3ameeting_YjgwMWEyN2EtNjA3MS00NmNkLThlZWEtNDIwMTJjMzZkZjQ0%40thread.v2/0? context=%7b%22Tid%22%3a%2228b14639-8f4d-4a40-93ef-e574aa275312%22%2c%22Oid%22%3a%2268580f5a-e0f7-48f5-9f2b-4c9a12f5e86b%22%7d>

Meeting ID: 241 582 114 085

Passcode: BQxMtQ

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e5/4aa2/5312&threadId=19_meeting_YjgwMwEyN2EtNjA3MS00NmNkL1hlZwEtNDIwM1JjMzZkZjQ0@thread.v2&messageId=0&language=en-US>
 From:
 Sibley, Jackson

 To:
 Kelly Kirven

 Cc:
 Hakala, Jim

Subject: RE: Rocky Mountain PFA Campground Data

Date: Thursday, May 18, 2023 5:01:37 PM

Kelly,

Below you'll find the requested Campground visitation and occupancy rates for Calendar Year 2022.

	Total	Total	Occupancy
Month	Campsites	Visitation	Percentage
January	1395	71	5.1
February	1260	142	11.3
March	1395	450	32.3
April	1350	844	62.5
May	1395	777	55.7
June	1350	824	61.0
July	1395	836	59.9
August	1395	647	46.4
September	1350	742	55.0
October	1395	717	51.4
November	1395	502	36.0
December	1395	142	10.2
Total			
CY22	16470	6694	40.6

Let me know if you have questions or need additional data,

Jackson Sibley Fisheries Biologist (706) 295-6102

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From: Kelly Kirven < Kelly. Kirven@KleinschmidtGroup.com>

Sent: Thursday, May 18, 2023 12:54 PM

To: Sibley, Jackson < Jackson. Sibley@dnr.ga.gov>

Cc: Hakala, Jim < Jim. Hakala@dnr.ga.gov>

Subject: RE: Rocky Mountain PFA Campground Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

No problem Jackson! Thank you!

Kelly Kirven

Section Manager – Terrestrial/Aquatics

Office: 803.462.5633

www.KleinschmidtGroup.com

From: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Sent: Thursday, May 18, 2023 10:36 AM

To: Kelly Kirven < Kelly.Kirven@KleinschmidtGroup.com >

Cc: Hakala, Jim < <u>Jim.Hakala@dnr.ga.gov</u>>

Subject: RE: Rocky Mountain PFA Campground Data

Kelly,

10-4. We'll work to compile the data. I'll be in the field for the remainder of the day so I may not get it to you until tomorrow.

Best,

Jackson Sibley
Fisheries Biologist
(706) 295-6102
Wildlife Resources Division
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From: Kelly Kirven < <u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Sent: Thursday, May 18, 2023 9:17 AM

To: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Cc: Hakala, Jim < <u>Jim.Hakala@dnr.ga.gov</u>>

Subject: RE: Rocky Mountain PFA Campground Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Campground visitation and site occupancy rates would be great. I'd like to include this information when determining overall recreation use estimates for the PFA. Revenue isn't necessary.

Thank you!

Kelly Kirven
Section Manager – Terrestrial/Aquatics
Office: 803.462.5633

www.KleinschmidtGroup.com

From: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>>

Sent: Thursday, May 18, 2023 9:15 AM

To: Kelly Kirven < <u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Cc: Hakala, Jim < Jim. Hakala@dnr.ga.gov >

Subject: RE: Rocky Mountain PFA Campground Data

Kelly,

Thanks for reaching out. What specific metrics will you need for 2022? Campground visitation, site occupancy rates, campground revenue?

Thanks,

Jackson Sibley
Fisheries Biologist
(706) 295-6102
Wildlife Resources Division
Facebook • Twitter • Instagram
Buy a hunting or fishing license today!

From: Kelly Kirven < <u>Kelly.Kirven@KleinschmidtGroup.com</u>>

Sent: Thursday, May 18, 2023 9:06 AM

To: Sibley, Jackson < <u>Jackson.Sibley@dnr.ga.gov</u>> **Subject:** Rocky Mountain PFA Campground Data

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jackson!

I am working on the recreation report for the Rocky Mountain PFA and in addition to the visitation information you provided (thanks again!) I was wondering if you could provide some data regarding campground reservations for 2022. I'm assuming that information wasn't included in the visitation data you provided previously, since that was based on traffic counts.

Thanks! Kelly

Kelly Kirven
Section Manager – Terrestrial/Aquatics
Kleinschmidt

Office: 803.462.5633 Cell: 423.747.2660 $\underline{www.KleinschmidtGroup.com}$

Meeting Summary

Rocky Mountain Relicensing Preliminary Study Update Meeting with Georgia Department of Natural Resources Environmental Protection Division

Date and Time: Friday, May 19, 2023, 10:30 am

Location: Virtual Meeting (Microsoft Teams)

Participants:

Wei Zeng, Georgia Department of Natural Resources – Environmental Protection

Division (GEPD)

Stephen Wiedl, GEPD

Elizabeth Booth, GEPD

David Hedeen, GEPD

Craig Jones, Oglethorpe Power Corporation (OPC)

Tyler McCaslin, OPC

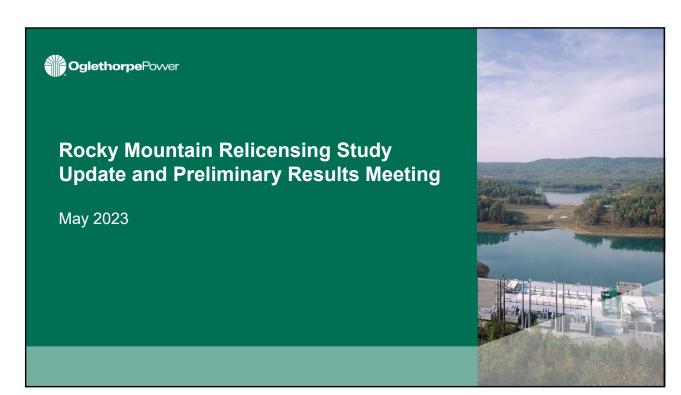
Christina Barrows, OPC

Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the Water Quality Assessment preliminary results in PowerPoint slides (attached). Discussion focused on results of the monthly water quality monitoring and continuous monitoring of dissolved oxygen (DO) in Heath Creek through March 2023. On a few occasions, pH values in the Auxiliary Pools exceeded 8.5, which likely resulted from high primary productivity associated with fertilization practices. Instantaneous DO values in Heath Creek downstream of the Main Dam fell below 4.0 milligrams per liter (mg/L) for short periods on 12 days in July-August 2022. Daily average DO values were greater than 5.0 mg/L for all days measured. GEPD expressed interest in seeing a plot of the daily average DO values, learning more about DO concentrations in the withdrawal zone of the minimum flow pipe in the Lower Reservoir, and ways to address the DO excursions. OPC proposed collecting additional DO monitoring data in summer 2023 to further investigate the causes of DO excursions.



Rocky Mountain Project Location * Floyd County, GA * 10 miles northwest of Rome * Ridge and Valley province * Coosa River basin * Heath Creek and Lavender Creek * Armuchee Creek tributary system of Oostanaula River 10/19/2023

Project Location in Alabama-Coosa-Tallapoosa (ACT) River Basin



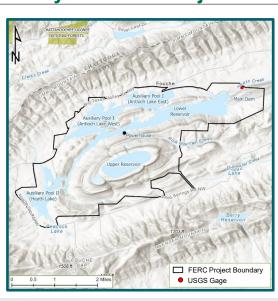


- ► ACT River basin 22,739 sq mi
- ► Coosa River 10,156 sq mi
 - Oostanaula River 2,150 sq mi
 - Armuchee Creek 226 sq mi
 - Heath Creek 16.6 sq mi
- Nine dams on Coosa and Alabama Rivers downstream of Project
- ★ Rocky Mountain Project

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Rocky Mountain Project Boundary





- ► Encompasses 5,000 acres of land and water
- Extends to about 0.3 mi downstream on Heath Creek
- Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek

Rocky Mountain Relicensing Studies

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- ► Water Quality Assessment
- ► Aquatic Resources Study
- ► Terrestrial & Wetland Resources Survey
- ► Recreation Use Analysis
- ► Cultural Resources Assessment
 - Archaeological Assessment
 - Architectural Assessment
- ► Trispot Darter Survey
 - Scoped with FWS and GDNR in fall 2022



10/19/2023

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Study Objectives

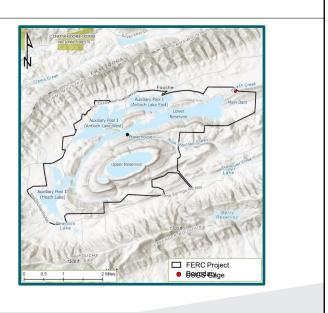
- ► Characterize existing water quality in the Rocky Mountain study area
- ► Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application

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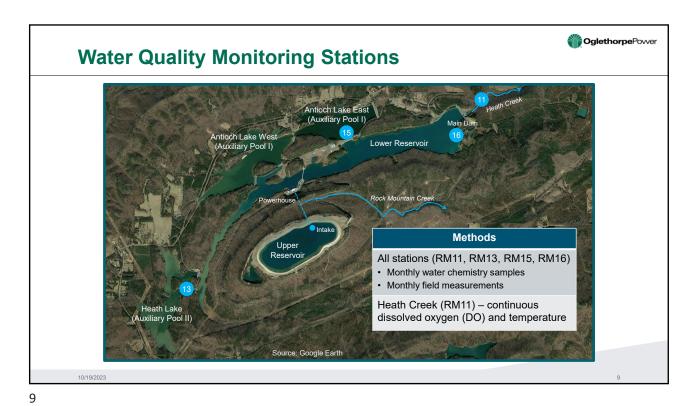
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Study Area

► Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary



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Methods

- ► Monthly water quality monitoring at four stations June 2022-May 2023
 - Additional Ammonia sample from Heath Creek ~2.5 miles downstream of project boundary in July 2022
- Continuous monitoring of dissolved oxygen (DO) and water temperature in Heath Creek June 2022-June 2023
 - · HOBO DO logger
 - Checked and cleaned approximately every 2 weeks during summer months

Water Chemistry Samples	Field Measurements
Ammonia	Water temperature
Total Kjeldahl Nitrogen (TKN)	Dissolved oxygen (DO)
Nitrate-Nitrite	Specific conductance
Total Phosphorus	рН
Orthophosphate	Turbidity
5-day Biochemical Oxygen Demand (BOD)	

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Preliminary Results – Water Chemistry (June 2022-March 2023)

- Results for most parameters generally lower compared to previous analyses summarized in PAD (1996-2020)
- Ammonia not detected in Lower
 Reservoir or Heath Creek downstream
 - Also not detected in Heath Creek 2.5 miles downstream in July 2022
- Highest mean concentrations for TKN, nitrate-nitrite, and total phosphorus from Auxiliary Pool I (RM15) but lower than previous analyses

Analyte		RM11 (Heath Creek)	RM13 (Aux. Pool II)	RM15 (Aux. Pool I)	RM16 (Lower Reservoir)	
Ammonia	# Detections	0	1	2	0	
(mg/L)	Min	NA	0.160	0.180	NA	
	Avg	NA	0.160	0.438	NA	
	Max	NA	0.160	0.696	NA	
TKN	# Detections	4	9	9	3	
(mg/L)	Min	0.120	0.152	0.384	0.13	
	Avg	0.158	0.556	0.669	0.151	
	Max	0.190	1.200	1.040	0.17	
Nitrate-Nitrite	# Detections	9	3	2	8	
(mg/L)	Min	0.008	0.057	0.210	0.005	
	Avg	0.141	0.109	0.222	0.086	
	Max	0.560	0.210	0.234	0.230	
Total Phosphorus	# Detections	0	2	4	0	
(mg/L)	Min	NA	0.006	0.005	NA	
	Avg	NA	0.032	0.039	NA	
	Max	NA	0.057	0.064	NA	
Orthophosphate	# Detections	1	0	0	0	
(mg/L)	Min	0.030	NA	NA	NA	
	Avg	0.030	NA	NA	NA	
	Max	0.030	NA	NA	NA	
BOD	# Detections	3	5	5	2	
(mg/L)	Min	3.40	3.80	3.56	7.68	
	Avg	7.18	7.76	4.39	8.84	
	Max	13.10	12.10	5.5	10.00	

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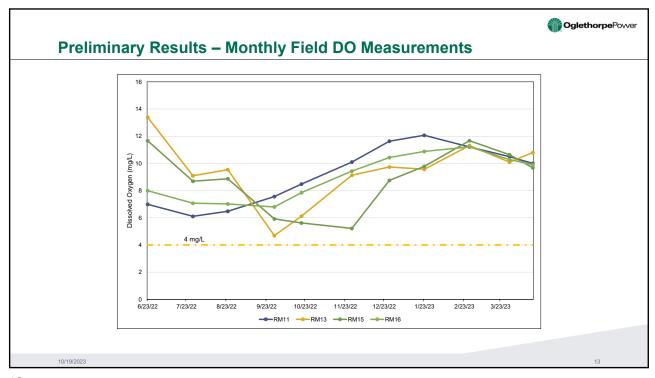
Preliminary Results – Field Measurements (June 2022-April 2023)

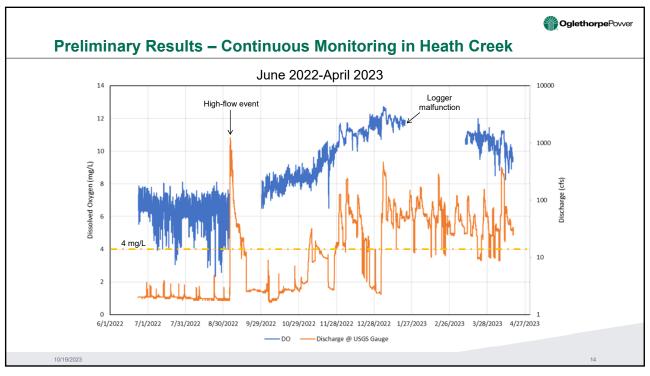
Location		Water Temperature (°C)	Specific Conductance (µs/cm)	pН	DO (mg/L)	DO (% sat.)	Turbidity (FNU)
	Min	7.208	111.4	7.03	6.11	74.7	0.66
RM11 (Heath Cr.)	Avg	16.86	129	7.60	9.19	92.5	1.65
(Max	25.86	147.3	7.96	12.07	108.3	2.96
	Min	6.837	54.9	6.81	4.69	53.9	1.4
RM13 (Aux. Pool II)	Avg	19.65	69	7.94	9.41	104.0	3.10
(,	Max	31.79	86.1	9.33	13.39	182.2	8.36
	Min	7.77	71.7	7.22	5.22	49.6	0.74
RM15 (Aux. Pool I)	Avg	19.38	81	7.97	8.77	96.0	1.91
(Max	30.72	99.3	9.62	11.67	156.0	6.29
RM16 (Lower Reservoir)	Min	9.62	102.2	7.43	6.8	82.2	0
	Avg	19.82	115	7.73	8.99	96.6	1.29
	Max	30.01	125.2	7.97	11.22	109.2	6.58

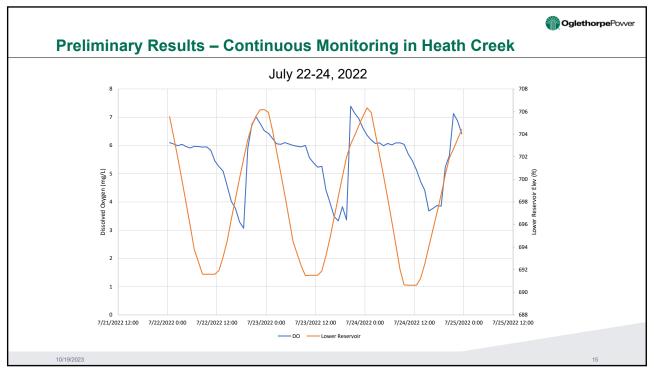
- Results met applicable water quality numeric criteria with exception of some pH values at two stations
- ► pH values exceeded 8.5 on a few occasions at Auxiliary Pools I and II
 - DO supersaturation indicates high levels of primary production (photosynthesis)
 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

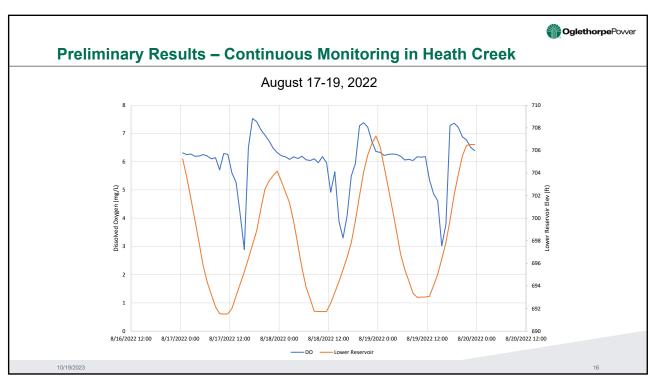
10/19/2023

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Summary of Water Quality Preliminary Findings

- Water chemistry constituents are generally present in lower concentration compared to historical results
- ► Elevated pH in Auxiliary Pools likely results from high primary productivity associated with fertilization practices
- ► Water temperature and daily average DO levels in Heath Creek meet applicable water quality criteria 100% of the time
 - Daily average DO concentration > 5 mg/L for all days measured
 - Instantaneous DO values < 4 mg/L on 12 days in Jul-Aug 2022
 - Instantaneous DO values met applicable criteria (> 4.0 mg/L) 98.5% of the time during summer critical period (Jun 23-Oct 31, 2022)

Meeting Summary

Rocky Mountain Relicensing Study Update & Preliminary Results Meeting with Georgia Department of Natural Resources Wildlife Resources Division

Date and Time: Thursday, May 24, 2023, 10:00 am

Location: Virtual Meeting (Microsoft Teams)

Participants:

Jim Hakala, Georgia Department of Natural Resources (GDNR)

Jackson Sibley, GDNR Clint Peacock, GDNR Paula Marcinek, GDNR Anakela Escobar, GDNR

David Gregory, GDNR

Craig Jones, Oglethorpe Power Corporation (OPC)

Tyler McCaslin, OPC

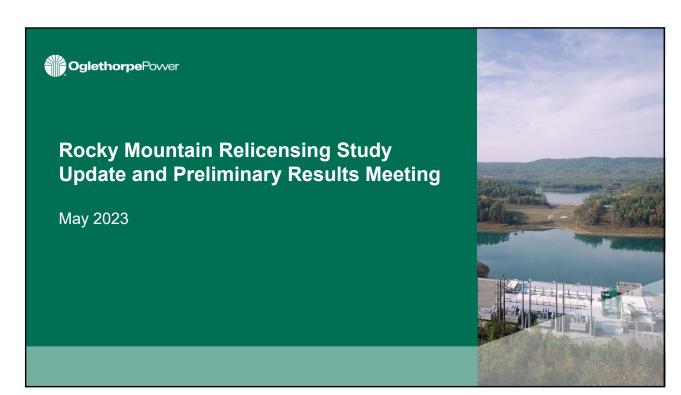
Christina Barrows, OPC

Kelly Kirven, Kleinschmidt Associates Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the Water Quality Assessment, Aquatic Resources, Trispot Darter Survey, Terrestrial and Wetland Resources, and Recreation Use Analysis preliminary study results in PowerPoint slides (attached). Discussion of the water quality monitoring results focused on instantaneous dissolved oxygen (DO) values in Heath Creek downstream of the Main Dam falling below 4.0 milligrams per liter for short periods on 12 days in July-August 2022. GDNR expressed interest in continued monitoring and ways to mitigate summer DO excursions. Discussion also included the fish and mussel survey results in Heath Creek, the Trispot Darter survey results, the recreation survey results and data presentation to include in the study report, and the terrestrial/wetlands and rare, threatened, and endangered species field survey findings.



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Project Location in Alabama-Coosa-Tallapoosa (ACT) River Basin



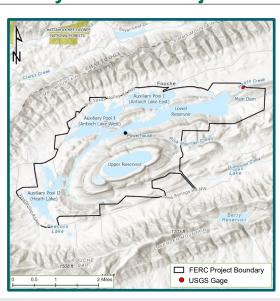


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Rocky Mountain Relicensing Studies

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Study Objectives

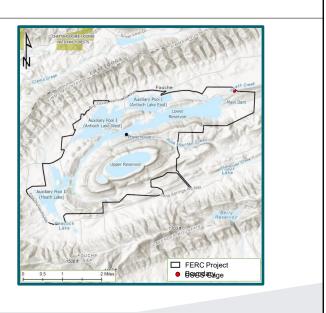
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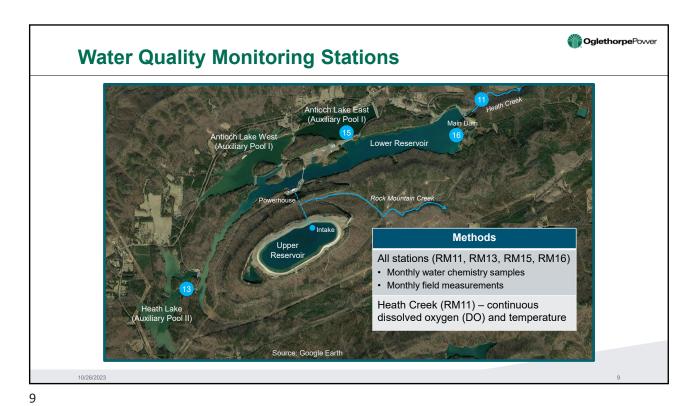
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► Lower Reservoir, Auxiliary
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Pool II (Heath Lake), and
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10/26/2023



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Total Kjeldahl Nitrogen (TKN)	Dissolved oxygen (DO)
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Total Phosphorus	pH
Orthophosphate	Turbidity
5-day Biochemical Oxygen Demand (BOD)	

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Preliminary Results – Water Chemistry (June 2022-March 2023)

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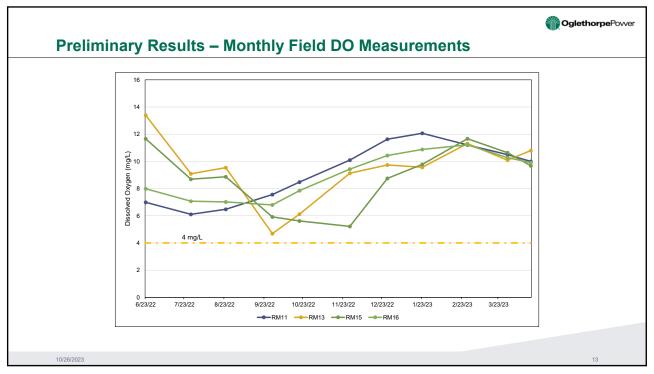
Preliminary Results - Field Measurements (June 2022-April 2023)

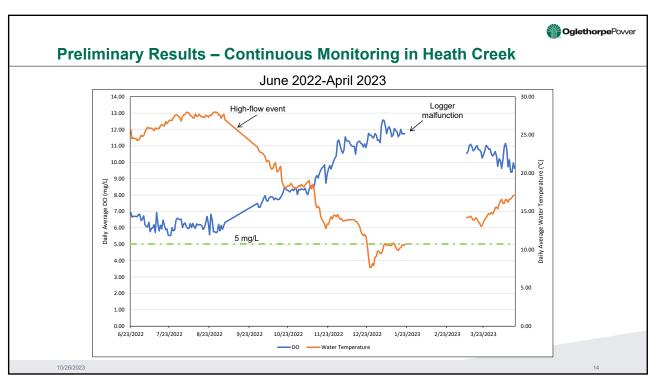
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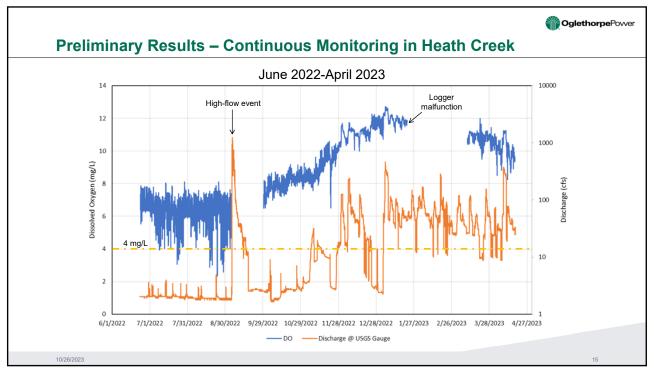
- Results met applicable water quality numeric criteria with exception of some pH values at two stations
- ► pH values exceeded 8.5 on a few occasions at Auxiliary Pools I and II
 - DO supersaturation indicates high levels of primary production (photosynthesis)
 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

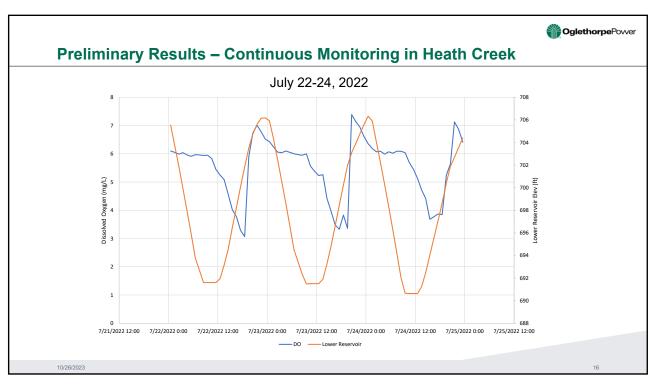
10/26/202

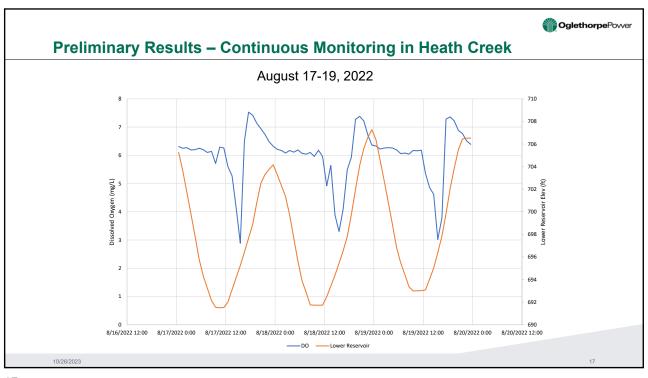
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Summary of Water Quality Preliminary Findings

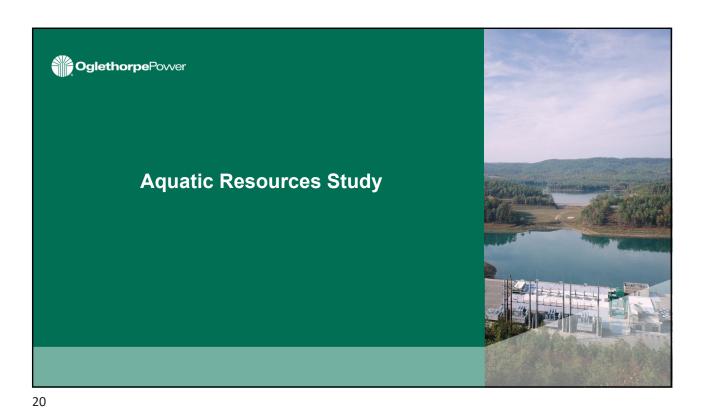


- ► Water chemistry constituents are generally present in lower concentration compared to historical results
- ► Elevated pH in Auxiliary Pools likely results from high primary productivity associated with fertilization practices
- Water temperature and daily average DO levels in Heath Creek meet applicable water quality criteria 100% of the time
 - Daily average DO concentration > 5 mg/L for all days measured
 - Instantaneous DO values < 4 mg/L on 12 days in Jul-Aug 2022
 - Instantaneous DO values met applicable criteria (> 4.0 mg/L) 98.5% of the time during summer critical period (Jun 23-Oct 31, 2022)

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Study Objectives

- ► Characterize existing communities of fish and mussels in Heath Creek downstream of the Project
- ► Assess the occurrence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails
- ► Develop aquatic resources information sufficient for analyzing the effects of project operation on aquatic habitat downstream of the Project in the license application

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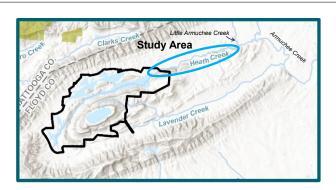
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Study Area

- Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek
 - Approximately 4-mile reach



10/26/2023

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Methods

- ► Fish community survey
 - · Backpack electrofishing
 - 2 stations on Heath Creek
 - One station sampled by GDNR Stream Team in 2001 and 2002
 - Additional station within project boundary
 - Index of Biotic Integrity (IBI) assessment approach
- ► Freshwater Mussel survey
 - Entire length of Heath Creek
 - · Dinkins Biological Consulting
 - · Masks and snorkels





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23



Preliminary Findings – Fish Community Survey

- ► Sampling in Heath Creek yielded 27 species in 8 families
 - · Mostly sunfishes, minnows, suckers, darters, and bullhead catfishes
 - Additional 3 species collected in separate Trispot Darter surveys
- Overall species composition similar to prior Heath Creek surveys
- ► No federally listed or state protected fish species collected
- Upstream community dominated by sunfishes
 - IBI rating of "very poor" compared to least-disturbed reference conditions
- ▶ Downstream community diverse but capture rates low
 - IBI rating of "fair" compared to least-disturbed reference conditions

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Preliminary Findings – Mussel Survey

- ► Survey yielded 147 specimens of mussels representing four native species
- ► One species (Alabama Rainbow) under federal review for possible listing; found about 2 stream miles downstream of the project boundary
- ► Two species of aquatic gastropods found sporadically throughout reach
 - Campeloma regulare (Campeloma) and Pleurocera showalteri (Upland Hornsnail)

Scientific Name	Common Name	Live Mussels	Relative Abundance (Percent)	Fresh Dead Mussels	Relict Shells
Villosa vibex	Southern Rainbow	93	63.3	26	1
Leaunio lienosa (Villosa lienosa)	Little Spectaclecase	53	36.1	258	4
Cambarunio nebulosus (Villosa nebulosa)	Alabama Rainbow	1	0.7	1	-
Utterbackia imbecillis	Paper Pondshell	-		2	
	Total	147			



Summary of Aquatic Resources Preliminary Findings

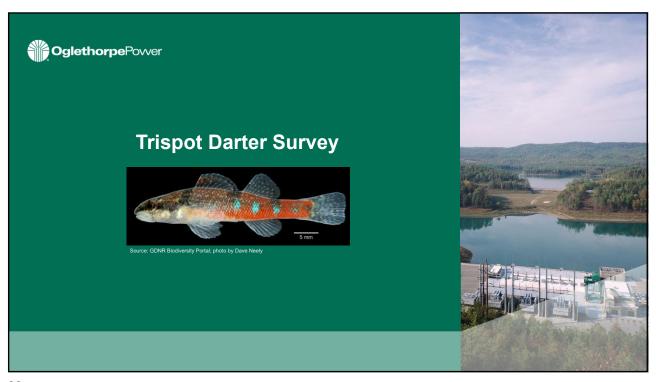
- ► Fish community sampling yielded species composition similar to previous Heath Creek surveys and individuals appeared healthy
 - Station HC-1 dominated by sunfishes, contributing to IBI rating of "very poor"
 - Station HC-2 more diverse but low capture rates, contributing to IBI rating of "fair"
- ► Mussel survey yielded 147 live mussels representing four native species and two native species of aquatic snails
- No federally listed or state protected aquatic species collected
- ► One live individual of Alabama Rainbow, under review for possible federal listing, was found downstream of the project boundary

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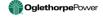
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Study Objectives



- ► Identify potentially suitable spawning habitat for federally threatened Trispot Darter (*Etheostoma trisella*) in the study area
- ► Perform two surveys for Trispot Darters between late January and early March 2023 in potentially suitable spawning habitat within the study area

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Study Area

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- Seepage area/pond below Dam A
- Channel A from Dam A to confluence with Heath Creek
- Other small tributaries and seepage areas



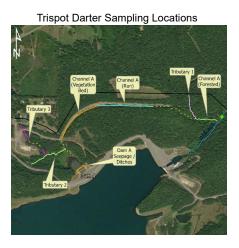
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Methods

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- ► Combinations of seining, electrofishing, and dipnetting in wadable habitats
- ► Two sampling events separated by 3 weeks • Feb 7 and 28, 2023
- ► Fish identified and released; species assigned relative abundance rankings
- Water quality field measurements recorded within two segments of Channel A



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Preliminary Findings

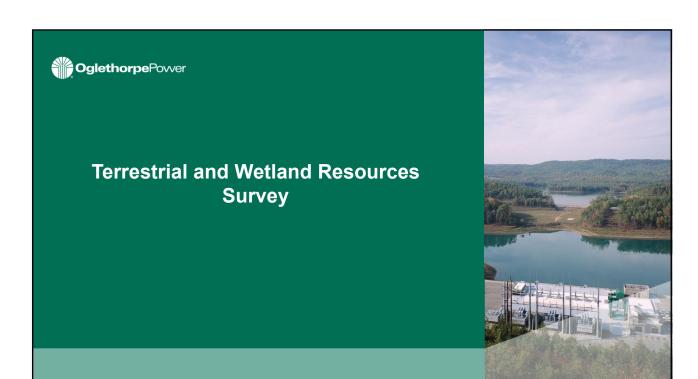
- ► Sampling in small tributaries and associated seepage areas and wet ditches yielded 22 fish species
 - Mostly sunfishes (8 species) and minnows (7 species)
 - Two darter species Coosa Darter and Speckled Darter
 - Least Brook Lamprey
- ► No Trispot Darters were observed or collected
- ► Ephemeral/intermittent channels more typical of Trispot Darter spawning habitats generally lacking instream cover or aquatic vegetation and with a prevalence of soft, silty substrates

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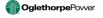
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Study Objectives

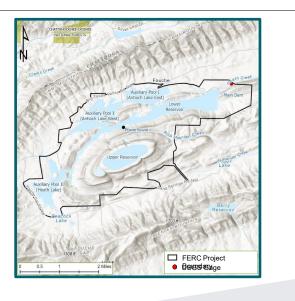


- ► Describe vegetative community types, habitats, representative plant and animal species, unique habitats, invasive species
 - Describe floodplain, wetlands, and riparian habitats
 - Prepare vegetation community/wetlands map
- ► Identify potentially suitable habitat for RTE species of plants and animals within the project boundary
- ► Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and RTE plants and wildlife in the license application

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Study Area

► Project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek



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Methods

- ► Review existing literature and information
 - Prepare GIS maps for use by field teams
 - Update RTE species list prior to field surveys
- ► Conduct field reconnaissance surveys to inventory botanical and wildlife resources and survey for RTE plants
 - Teams of two biologists/ecologists
 - Boating along shorelines and pedestrian surveys
 - Surveys in summer and fall 2022, spring 2023



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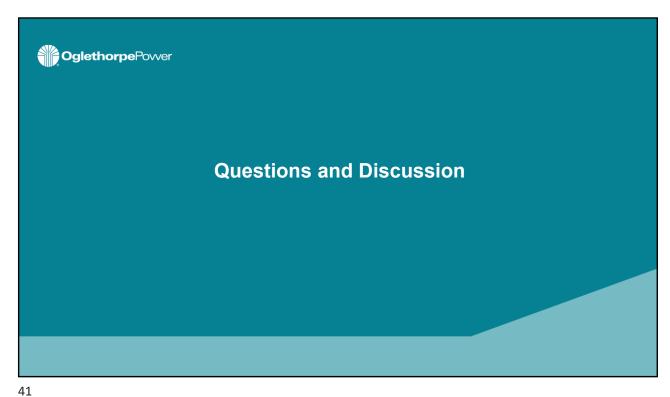
Terrestrial and Wetland Preliminary Findings

- Terrestrial vegetation
 - 14 major vegetative community/habitat types
 - · Over 300 vascular plant species
 - · Invasive plant species relatively scarce; 11 small locations mapped
- ▶ Wetlands
 - · 34 acres of bottomland hardwoods
 - 85 acres of emergent/herbaceous wetland habitats
- ▶ Wildlife
 - Observed 8 mammal, 62 bird, 5 amphibian, and 10 reptile species
- ► Rare, threatened, and endangered species
 - · No federally listed species observed
 - One state protected species observed Bald Eagle
 - Potentially suitable habitat for Green Salamander (R) and Cherokee Clubtail (UR)
 - Summer roosting habitat for Indiana Bat (E) and Northern Long-eared Bat (E)

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Vegetation Community Mapping - Examples | Figure | Figur



Recreation Use Analysis



Study Objectives

- Characterize the existing facilities and recreational use within the project boundary through existing information review, and field activities to inventory and describe existing facilities and survey recreation users at the Project
- Develop recreational use information sufficient for analyzing the effects of continued project operation and maintenance on recreation resources in the license application

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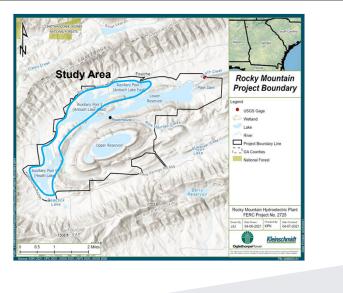
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Study Area

- ► Rocky Mountain PFA
 - Auxiliary Pool I (Antioch Lake East and West)
 - Auxiliary Pool II (Heath Lake)



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Methodology

- ► Study approach
 - Inventory existing recreation facilities and characterize recreational use
 - On-site recreation surveys on 15 days
 - 9 days in Jun-Oct 2022, 6 days in Mar-May 2023
 - Similar level of effort as GDNR 2006-2007 survey (approximately 312 OPC hours vs. 310 GDNR hours)
 - Surveys collected at 3 entrances Main, Beach and Heath
 - Survey drop-box in campground Jun-Oct 2022
 - Apply GDNR traffic-count data to estimate recreational use

Oglethorpe Power Corporation Rocky Mountain Pumped S Project Recreation U Survey	torage with e	tional unisting of Pleas	ower Cor se at Roci recreation e take a f you for yo	ky Mour faciliti lew min	ntain es, ar utes 1	Public nd whe to answ	Fishing other f	Area (Pi scility im	FA), user proveme	satisfactions may
Location:Mai	nBeach_	He	ath	Date:				Time		
Interviewer:										
Vehicle Type:	Vehicle w/ Tra			de w/o		1	RV/	Camper		
 What is your coun 		sidence	?	Count	γ.			St	ate:	
What is your zip orHow many people						peo	-1-			
4. What is your age?			ur group t		-34	peo	35-		45-54	55
5. If you came with o						t anni		-	43.34	
Children (Infant		outh (13				(18-55		Seni	or Arkelts	(over 55)
6. How did you hear		Petit (20	417		0010	(10.00		3010	or Products	(010: 33)
Friend/Relativ		5	iocial Med	Sia						Other
7. How many times (including today).	have vo	u visited	Rocky N	ftn Pf	A in th	e last !	0 days?		
8. What is the prima	ry reason for you	r visit to	day? (che	ck all th	at ap	ply)				
Boat Fishing	Picnicking			Hiking			Canoeing/kayaking			
Bank Fishing	Swimming			Biking			Wildlife viewing			
Camping	Hunting	Hunting			Pleasure Boating			Shoreline relaxation		
Other:										
9. If you came to fish		id your			xperie					
Very Good (5)	Good (4)		Fair (3)		Pc	oor (2)		Ven	y Poor (1)
10. If you came to fis						_	_			
Antioch Lake			Antioch L				_	Heath	Lake	
11. If you came to hu		outd you			ag ext			_		
Very Good (5)	Good (4)		Fair (_	Poor (2)				y Poor (1)
12. Please rate the q Parking:	Very Good		Good (4		s area Fair			for each)	ry Poor (1
Boat Ramp:	Very Good		Good (4		Fair			oor (2)		ry Poor (1
Docks:	Very Good		Good (4		Fair			oor (2)		ry Poor (1
Restrooms:	Very Good		Good		Fair			oor (2)		ry Poor (1
Bank Fishing:	Very Good		Good (4		Fair			oor (2)		ry Poor (1 ry Poor (1
Beach:	Very Good		_Good (4		_Fair			oor (2)		ry Poor (1
Picnic Areas:	Very Good		Good (4		Fair			oor (2)		ry Poor (1
Campsites:	Very Good		Good (4		_Fair			oor (2)		ry Poor (1
Trails:	Very Good		Good (_Fair			oor (2)		ry Poor (1
Cleanliness:	Very Good		Good (4		_Fair			oor (2)		ry Poor (1
 List any specific i suggestions. 	mprovements yo	u would	like to se	e at Roo	ky M	ountai	n PFA,	and any o	other con	nments or

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Recreation Use Analysis Preliminary Findings

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Surveys Collected through April 1, 2023
109
46
63
24
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Visitation Permit	Percent
Daily	64%
Annual	20%
Camping	8%
None	7%

People per	vehicle
Location	Average
Heath	1.9
Beach	3.7
Main	1.7

Age	
Range	Percent
16-24	7%
25-34	16%
35-44	19%
45-54	23%
55+	36%

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Recreation Use Analysis Preliminary Findings

Location	Main	Beach	Heath	Campground
Boat Fishing	52%	1%	85%	8%
Bank Fishing	24%	24%	15%	42%
Camping	-	22%	2%	100%
Picnicking	-	25%	-	38%
Swimming	-	57%	-	54%
Hunting	-	-	-	4%
Hiking	3%	1%	-	50%
Biking	3%	-	-	17%
Pleasure Boating	-	-	-	17%
Canoeing/Kayaking	10%	3%	-	29%
Wildlife Viewing	3%	2%	-	58%
Shoreline Relaxation	-	29%	-	67%
Other	6%	2%	-	4%

Fishing Experience	Percent
Very Poor (1)	20%
Poor (2)	15%
Fair (3)	21%
Good (4)	22%
Very Good (5)	21%

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Recreation Use Analysis Preliminary Findings

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Facility Ratings - Collected at Main, Beach, and Heath

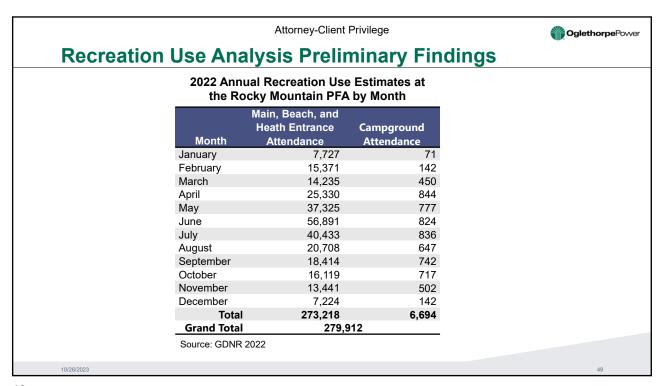
Facilities	Rating						
Facilities	Very Good	Good	Fair	Poor	Very Poor		
Parking	63.3%	27.2%	5.7%	3.2%	0.6%		
Boat Ramp	54.7%	34.7%	6.6%	4.0%	0.0%		
Docks	60.9%	32.2%	6.9%	0.0%	0.00%		
Restrooms	41.5%	40.7%	12.6%	3.7%	1.5%		
Bank Fishing	41.3%	28.6%	22.2%	4.8%	3.2%		
Beach	65.4%	28.4%	4.9%	1.2%	0.0%		
Picnic Areas	71.1%	24.1%	3.6%	1.2%	0.0%		
Campsites	70.7%	22.0%	7.3%	0.0%	0.0%		
Trails	58.3%	29.2%	8.3%	4.2%	0.0%		
Cleanliness	74.1%	22.8%	2.5%	0.0%	0.6%		

Facility Ratings - Collected at Campground

		Rating				
Facilities	Very Good	Good	Fair	Poor	Very Poor	
Online Booking	52%	29%	14%	0%	5%	
Fishing	10%	20%	60%	0%	10%	
Campsite	59%	36%	5%	0%	0%	
Playground	64%	29%	0%	7%	0%	
Restrooms	48%	43%	4%	4%	0%	
Cleanliness	52%	35%	4%	9%	0%	
Bank Fishing	14%	43%	29%	14%	0%	

User Suggestions (Sample)

	provements, Comments and Suggestions – Beach Location
Lifeguard	
Power out	lets at pavilion
Clean mor	e
	d use railings, need more toilets, automatic flushers, more separated dressin air some grills, need a map of the trails, cell service is lacking
Better grill	s, signs for trails
More park	ing
Concession	n stand
Larger bea	ch and swimming area
Better mai	ked trails, deeper swimming area
More dock	s, more picnic tables closer to water, bathroom closer to water
Pool, splas	h pad
Splash pad	s, more stuff for kids
Take some	debris out of reservoir - fishing line gets snagged
More shad	e, get rid of ants
Tight parki	ng spaces, get rid of ants, deeper and larger swimming area
Bigger swi	m area
Signs for d	irections
	vers in bathroom, electrical outlets and water in wrong place - when you back k ups are on the wrong side, narrow camp spots
Electrical a	nd water hookups for camping on wrong side and camping spots are narrov
Need more	than 1 ramp at Antioch West, more bathrooms and showers
Floating do	ock with a slide to keep kids off floating buoy line, need an indoor shower is om
People lea	ving trash and bait cups occasionally, otherwise very clean
More signa	age for trails, cleaner bathrooms
Cleaner ba	throoms - they can get messy by end of the day
Air circulat	ion in restrooms
One of the	trails floods when rains - very muddy
Shade opti	ons by the sand
Wider par people sm	king spots, more regular cleaning in the bathrooms throughout the day oking
Doesn't lik	e how camping requires reservations now - didn't know that





Meeting Summary

Rocky Mountain Relicensing Study Update & Preliminary Results Meeting with U.S. Fish and Wildlife Service

Date and Time: Friday, June 9, 2023, 10:00 am

Location: Virtual Meeting (Microsoft Teams)

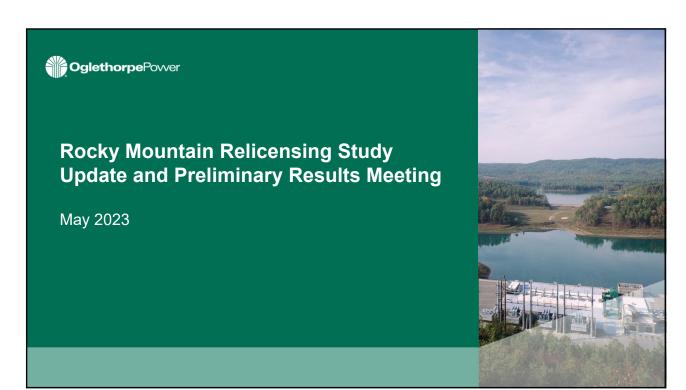
Participants:

Eric Bauer, U.S. Fish and Wildlife Service (USFWS) Craig Jones, Oglethorpe Power Corporation (OPC) Christina Barrows, OPC Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the Water Quality Assessment, Aquatic Resources, Trispot Darter Survey, and Terrestrial and Wetland Resources preliminary study results in PowerPoint slides (attached). Topics discussed included the continuous water quality monitoring results in Heath Creek downstream of the Main Dam, including occasional dissolved oxygen excursions below 4.0 milligrams per liter for short periods in July-August 2022; field survey observations relative to potentially suitable spring-fed stream habitat for the Cherokee Clubtail dragonfly (under review for federal listing); continuing protection of the Bald Eagle under the Bald and Gold Eagle Protection Act; the Tricolored Bat being proposed for federal listing; and USFWS interests in migratory birds and avian protection.



Rocky Mountain Project Location Floyd County, GA 10 miles northwest of Rome Ridge and Valley province Coosa River basin Heath Creek and Lavender Creek Armuchee Creek tributary system of Oostanaula River

Project Location in Alabama-Coosa-Tallapoosa (ACT) River Basin



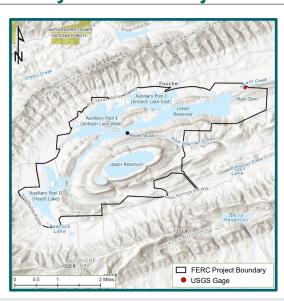


- ► ACT River basin 22,739 sq mi
- ► Coosa River 10,156 sq mi
 - Oostanaula River 2,150 sq mi
 - Armuchee Creek 226 sq mi
 - Heath Creek 16.6 sq mi
- ► Nine dams on Coosa and Alabama Rivers downstream of Project
- ★ Rocky Mountain Project

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Rocky Mountain Project Boundary





- ► Encompasses 5,000 acres of land and water
- Extends to about 0.3 mi downstream on Heath Creek
- Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek

Rocky Mountain Relicensing Studies

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- ► Water Quality Assessment
- ► Aquatic Resources Study
- ► Terrestrial & Wetland Resources Survey
- ► Recreation Use Analysis
- ► Cultural Resources Assessment
 - Archaeological Assessment
 - Architectural Assessment
- ► Trispot Darter Survey
 - Scoped with FWS and GDNR in fall 2022



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Study Objectives

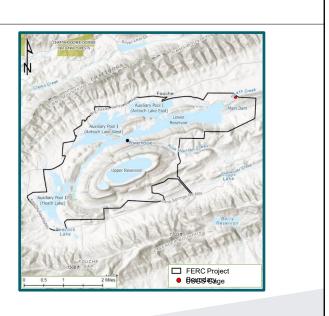
- ► Characterize existing water quality in the Rocky Mountain study area
- ► Develop water quality information sufficient for analyzing the effects of project operation and maintenance and project-related recreation on water quality in the license application

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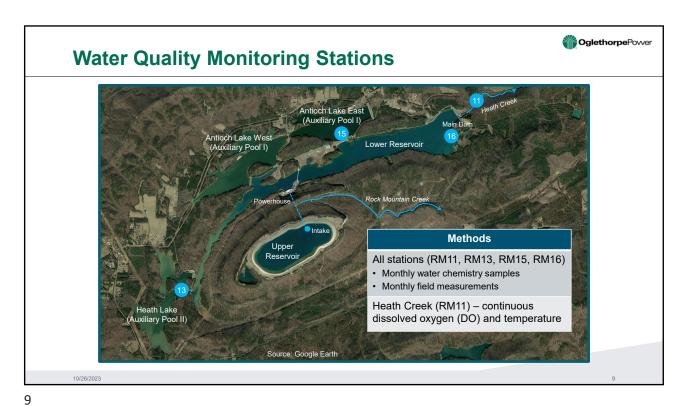
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Study Area

► Lower Reservoir, Auxiliary
Pool I (Antioch Lake), Auxiliary
Pool II (Heath Lake), and
Heath Creek downstream of
the Main Dam within the
project boundary



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Methods

- Monthly water quality monitoring at four stations June 2022-May 2023
 - Additional Ammonia sample from Heath Creek ~2.5 miles downstream of project boundary in July 2022
- Continuous monitoring of dissolved oxygen (DO) and water temperature in Heath Creek June 2022-June 2023
 - · HOBO DO logger
 - Checked and cleaned approximately every 2 weeks during summer months

Water Chemistry Samples	Field Measurements
Ammonia	Water temperature
Total Kjeldahl Nitrogen (TKN)	Dissolved oxygen (DO)
Nitrate-Nitrite	Specific conductance
Total Phosphorus	pH
Orthophosphate	Turbidity
5-day Biochemical Oxygen Demand (BOD)	

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Preliminary Results – Water Chemistry (June 2022-March 2023)

- Results for most parameters generally lower compared to previous analyses summarized in PAD (1996-2020)
- Ammonia not detected in Lower
 Reservoir or Heath Creek downstream
 - Also not detected in Heath Creek 2.5 miles downstream in July 2022
- Highest mean concentrations for TKN, nitrate-nitrite, and total phosphorus from Auxiliary Pool I (RM15) but lower than previous analyses

Analyte		RM11 (Heath Creek)	RM13 (Aux. Pool II)	RM15 (Aux. Pool I)	RM16 (Lower Reservoir)
Ammonia	# Detections	0	1	2	0
(mg/L)	Min	NA	0.160	0.180	NA
	Avg	NA	0.160	0.438	NA
	Max	NA	0.160	0.696	NA
TKN	# Detections	4	9	9	3
(mg/L)	Min	0.120	0.152	0.384	0.13
	Avg	0.158	0.556	0.669	0.151
	Max	0.190	1.200	1.040	0.17
Nitrate-Nitrite	# Detections	9	3	2	8
(mg/L)	Min	0.008	0.057	0.210	0.005
	Avg	0.141	0.109	0.222	0.086
	Max	0.560	0.210	0.234	0.230
Total Phosphorus	# Detections	0	2	4	0
(mg/L)	Min	NA	0.006	0.005	NA
	Avg	NA	0.032	0.039	NA
	Max	NA	0.057	0.064	NA
Orthophosphate	# Detections	1	0	0	0
(mg/L)	Min	0.030	NA	NA	NA
	Avg	0.030	NA	NA	NA
	Max	0.030	NA	NA	NA
BOD	# Detections	3	5	5	2
(mg/L)	Min	3.40	3.80	3.56	7.68
	Avg	7.18	7.76	4.39	8.84
	Max	13.10	12.10	5.5	10.00

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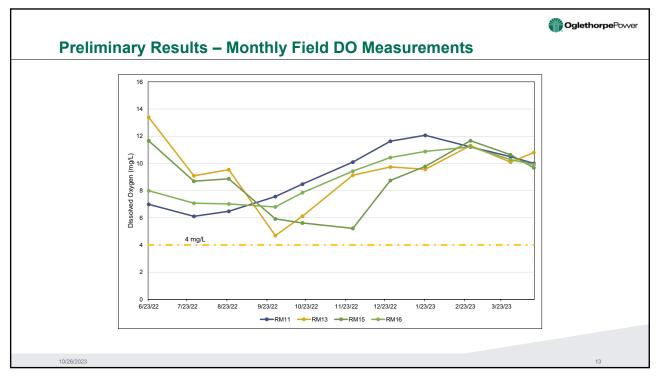
Preliminary Results – Field Measurements (June 2022-April 2023)

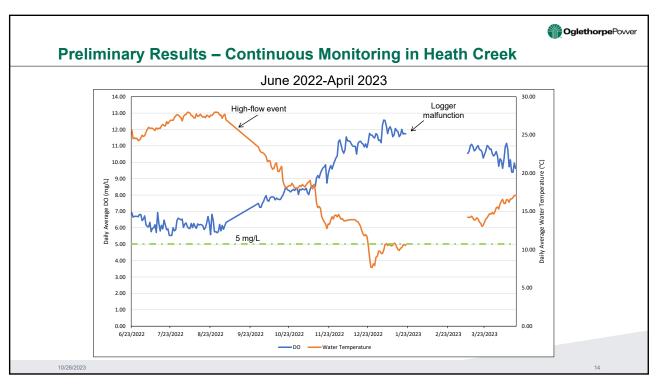
Location		Water Temperature (°C)	Specific Conductance (µs/cm)	рН	DO (mg/L)	DO (% sat.)	Turbidity (FNU)
RM11 (Heath Cr.)	Min	7.208	111.4	7.03	6.11	74.7	0.66
	Avg	16.86	129	7.60	9.19	92.5	1.65
	Max	25.86	147.3	7.96	12.07	108.3	2.96
RM13 (Aux. Pool II)	Min	6.837	54.9	6.81	4.69	53.9	1.4
	Avg	19.65	69	7.94	9.41	104.0	3.10
	Max	31.79	86.1	9.33	13.39	182.2	8.36
RM15 (Aux. Pool I)	Min	7.77	71.7	7.22	5.22	49.6	0.74
	Avg	19.38	81	7.97	8.77	96.0	1.91
	Max	30.72	99.3	9.62	11.67	156.0	6.29
RM16 (Lower Reservoir)	Min	9.62	102.2	7.43	6.8	82.2	0
	Avg	19.82	115	7.73	8.99	96.6	1.29
	Max	30.01	125.2	7.97	11.22	109.2	6.58

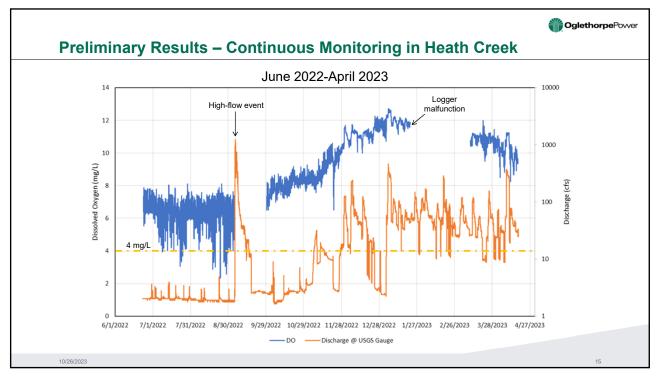
- Results met applicable water quality numeric criteria with exception of some pH values at two stations
- pH values exceeded 8.5 on a few occasions at Auxiliary Pools I and II
 - DO supersaturation indicates high levels of primary production (photosynthesis)
 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

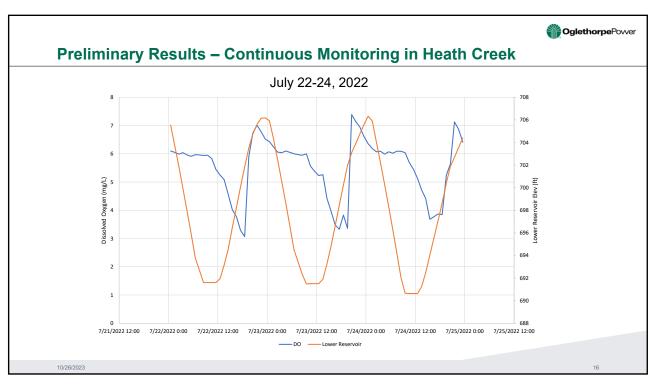
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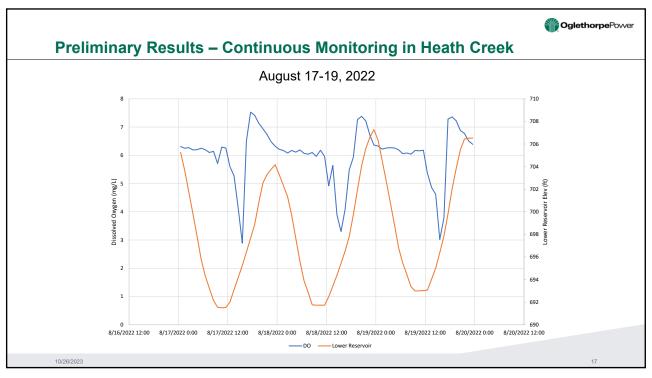
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Summary of Water Quality Preliminary Findings

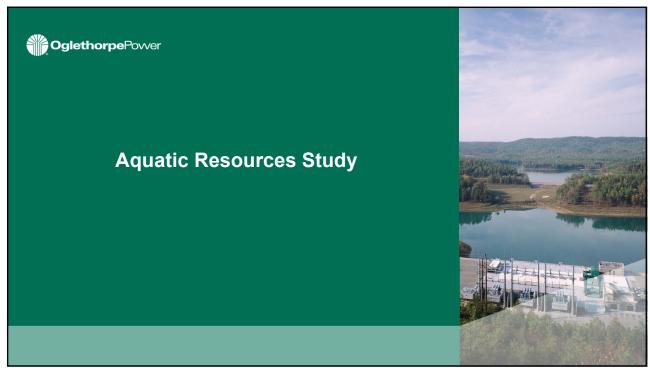


- ► Water chemistry constituents are generally present in lower concentration compared to historical results
- ► Elevated pH in Auxiliary Pools likely results from high primary productivity associated with fertilization practices
- Water temperature and daily average DO levels in Heath Creek meet applicable water quality criteria 100% of the time
 - Daily average DO concentration > 5 mg/L for all days measured
 - Instantaneous DO values < 4 mg/L on 12 days in Jul-Aug 2022
 - Instantaneous DO values met applicable criteria (> 4.0 mg/L) 98.5% of the time during summer critical period (Jun 23-Oct 31, 2022)

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Study Objectives

- ► Characterize existing communities of fish and mussels in Heath Creek downstream of the Project
- ► Assess the occurrence of rare, threatened, and endangered (RTE) species of freshwater mussels and snails
- ► Develop aquatic resources information sufficient for analyzing the effects of project operation on aquatic habitat downstream of the Project in the license application

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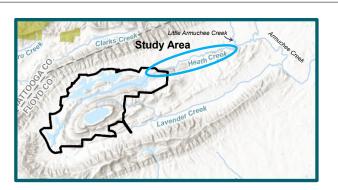
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Study Area

- Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek
 - Approximately 4-mile reach



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Methods

- ► Fish community survey
 - · Backpack electrofishing
 - 2 stations on Heath Creek
 - One station sampled by GDNR Stream Team in 2001 and 2002
 - Additional station within project boundary
 - Index of Biotic Integrity (IBI) assessment approach
- ► Freshwater Mussel survey
 - Entire length of Heath Creek
 - · Dinkins Biological Consulting
 - · Masks and snorkels





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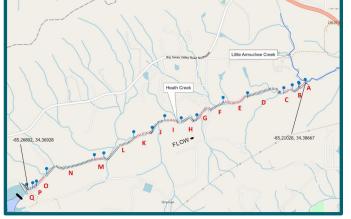
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Sampling Areas

Fish Sampling Stations Mussel Survey Reach





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Preliminary Findings – Fish Community Survey

- ► Sampling in Heath Creek yielded 27 species in 8 families
 - · Mostly sunfishes, minnows, suckers, darters, and bullhead catfishes
 - Additional 3 species collected in separate Trispot Darter surveys
- Overall species composition similar to prior Heath Creek surveys
- ► No federally listed or state protected fish species collected
- Upstream community dominated by sunfishes
 - IBI rating of "very poor" compared to least-disturbed reference conditions
- ▶ Downstream community diverse but capture rates low
 - IBI rating of "fair" compared to least-disturbed reference conditions

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Preliminary Findings – Mussel Survey

- ► Survey yielded 147 specimens of mussels representing four native species
- ► One species (Alabama Rainbow) under federal review for possible listing; found about 2 stream miles downstream of the project boundary
- ► Two species of aquatic gastropods found sporadically throughout reach
 - Campeloma regulare (Campeloma) and Pleurocera showalteri (Upland Hornsnail)

Scientific Name	Common Name	Live Mussels	Relative Abundance (Percent)	Fresh Dead Mussels	Relict Shells
Villosa vibex	Southern Rainbow	93	63.3	26	1
Leaunio lienosa (Villosa lienosa)	Little Spectaclecase	53	36.1	258	4
Cambarunio nebulosus (Villosa nebulosa)	Alabama Rainbow	1	0.7	1	
Utterbackia imbecillis	Paper Pondshell			2	
	Total	147			



Summary of Aquatic Resources Preliminary Findings

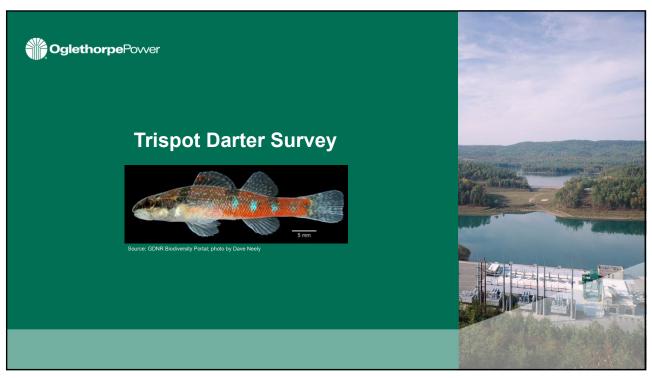
- ► Fish community sampling yielded species composition similar to previous Heath Creek surveys and individuals appeared healthy
 - Station HC-1 dominated by sunfishes, contributing to IBI rating of "very poor"
 - · Station HC-2 more diverse but low capture rates, contributing to IBI rating of "fair"
- ► Mussel survey yielded 147 live mussels representing four native species and two native species of aquatic snails
- ► No federally listed or state protected aquatic species collected
- ► One live individual of Alabama Rainbow, under review for possible federal listing, was found downstream of the project boundary

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Study Objectives



- ► Identify potentially suitable spawning habitat for federally threatened Trispot Darter (*Etheostoma trisella*) in the study area
- ► Perform two surveys for Trispot Darters between late January and early March 2023 in potentially suitable spawning habitat within the study area

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Study Area

- Seepage area/pond below Dam A
- ► Channel A from Dam A to confluence with Heath Creek
- Other small tributaries and seepage areas



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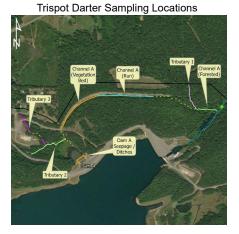
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Methods



- ► Combinations of seining, electrofishing, and dipnetting in wadable habitats
- ► Two sampling events separated by 3 weeks • Feb 7 and 28, 2023
- ► Fish identified and released; species assigned relative abundance rankings
- Water quality field measurements recorded within two segments of Channel A



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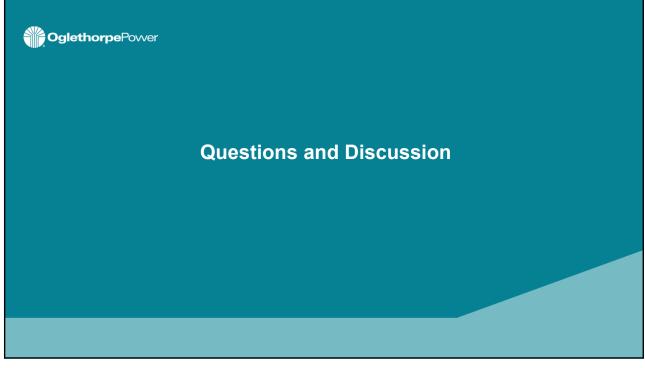


Preliminary Findings

- ► Sampling in small tributaries and associated seepage areas and wet ditches yielded 22 fish species
 - Mostly sunfishes (8 species) and minnows (7 species)
 - Two darter species Coosa Darter and Speckled Darter
 - Least Brook Lamprey
- ► No Trispot Darters were observed or collected
- ► Ephemeral/intermittent channels more typical of Trispot Darter spawning habitats generally lacking instream cover or aquatic vegetation and with a prevalence of soft, silty substrates

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Study Objectives

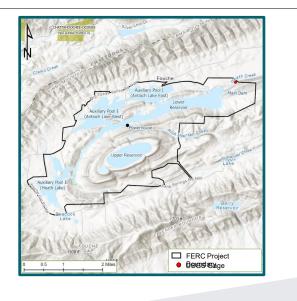


- ► Describe vegetative community types, habitats, representative plant and animal species, unique habitats, invasive species
 - Describe floodplain, wetlands, and riparian habitats
 - Prepare vegetation community/wetlands map
- ► Identify potentially suitable habitat for RTE species of plants and animals within the project boundary
- ► Develop information sufficient for analyzing the effects of continued project operation on terrestrial and wetland resources and RTE plants and wildlife in the license application

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Study Area

► Project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek



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Methods

- ► Review existing literature and information
 - Prepare GIS maps for use by field teams
 - Update RTE species list prior to field surveys
- ► Conduct field reconnaissance surveys to inventory botanical and wildlife resources and survey for RTE plants
 - Teams of two biologists/ecologists
 - Boating along shorelines and pedestrian surveys
 - Surveys in summer and fall 2022, spring 2023



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Terrestrial and Wetland Preliminary Findings

- Terrestrial vegetation
 - 14 major vegetative community/habitat types
 - · Over 300 vascular plant species
 - · Invasive plant species relatively scarce; 11 small locations mapped
- ▶ Wetlands
 - · 34 acres of bottomland hardwoods
 - · 85 acres of emergent/herbaceous wetland habitats
- ▶ Wildlife
 - Observed 8 mammal, 62 bird, 5 amphibian, and 10 reptile species
- ► Rare, threatened, and endangered species
 - · No federally listed species observed
 - One state protected species observed Bald Eagle
 - Potentially suitable habitat for Green Salamander (R) and Cherokee Clubtail (UR)
 - Summer roosting habitat for Indiana Bat (E) and Northern Long-eared Bat (E)

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Meeting Summary

Rocky Mountain Relicensing Update and Recreation Improvements Meeting with Georgia Department of Natural Resources Wildlife Resources Division

Date and Time: Tuesday, October 10, 2023, 10:00 am-1:00 pm

Location: Georgia Department of Natural Resources Office, Armuchee, Georgia

Participants:

Jim Hakala, Georgia Department of Natural Resources (GDNR)
Jackson Sibley, GDNR
David Gregory, GDNR
Clint Peacock, GDNR (virtual)
Anakela Escobar, GDNR (virtual)
Craig Jones, Oglethorpe Power Corporation (OPC)
Tyler McCaslin, OPC

Tyler McCaslin, OPC
Christina Barrows, OPC
Kelly Kirven, Kleinschmidt Associates
Steve Layman, Kleinschmidt Associates

Prepared by: Steve Layman

Meeting Summary

OPC provided an overview of the water quality, aquatic resources, terrestrial and wetland, rare, threatened, and endangered species, and recreation use analysis study findings. Discussion included the various studies, potential measures to address agency interests, and focused mainly on the list of needed facility repairs and improvements provided by GDNR to OPC by way of letter dated June 22, 2022.