

Exhibit E - APPENDIX A

CONSULTATION RECORD

Introduction

Oglethorpe Power Corporation (OPC) distributed the Draft License Application (DLA) to federal and state resource agencies, Indian Tribes, non-governmental organizations, and local governments, and filed it with the Federal Energy Regulatory Commission (FERC) on November 17, 2023. Exhibit E of the DLA provided a draft environmental analysis by resource area of the continuing and incremental impacts of OPC's proposal to continue operating the Rocky Mountain Project. OPC developed its preliminary licensing proposal in consultation with the stakeholders and by using information generated by resource studies. Exhibit E discussed OPC's proposed measures for protection, mitigation, and enhancement (environmental measures) with respect to each resource area affected by the licensing proposal. In addition, Exhibit E of the DLA provided the resource study reports and documented OPC's consultation with the stakeholders from the outset of the relicensing process up to preparation of the DLA.

The Georgia Department of Natural Resources (GDNR) Wildlife Resources Division (WRD), U.S. Fish and Wildlife Service (FWS), and FERC provided written comments on the DLA. OPC considered all of these comments in finalizing its proposed environmental measures and preparing Exhibit E for the Final License Application (FLA). Appendix B provides each comment letter (brackets and numbering added by OPC), followed by OPC's responses.

Subsequent to filing the DLA, OPC shared a preliminary draft Water Quality Assessment Study Report Addendum with WRD and GDNR Environmental Protection Division (GEPD) on January 2, 2024. The addendum provided the results of summer 2023 dissolved oxygen (DO) monitoring in Heath Creek, which were not available to the water quality analysis for Heath Creek in the DLA. OPC met with WRD on January 5, 2024 to discuss OPC's licensing proposal and the summer 2023 DO monitoring results. On January 16, 2024, OPC met virtually with GEPD to discuss the 2023 DO monitoring results.

Upon incorporating GEPD suggestions for further data analysis, OPC shared a revised draft Water Quality Assessment Study Report Addendum with GEPD and FWS on March 11, 2024. On March 12, 2024, OPC met virtually with FWS to discuss the summer 2023 DO monitoring results. Based on these discussions, OPC concluded that a Joint Meeting was warranted to further discuss the study. OPC held a virtual Joint Meeting on April 11, 2024, with FWS, GEPD, and WRD. Appendix C provides OPC's final Water Quality Study Report Addendum.

On October 8, 2024, OPC met virtually with WRD to discuss OPC's proposed recreation measures, conceptual plans for a new Americans with Disabilities Act-compliant fishing pier and two new kayak launches, and other WRD interests.

The following records document OPC's consultation with resource agencies, Indian Tribes, and members of the public from development and filing of the Pre-Application Document (PAD) on December 10, 2021 to filing of the FLA on November 15, 2024.



January 19, 2021

Certified Mail/ Return Receipt #
7020 0640 0001 1375 3942

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

Dear Mr. Harjo:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

The PAD is intended to provide detailed information about the project early in the process and comprises a description of the project and relevant information about the project environment and resources to facilitate the identification of issues and information needs. OPC plans to distribute the PAD next summer to federal and state resource agencies, Indian tribes, local governments, and members of the public likely to be interested in the proceeding. To help ensure that we are including the requisite project information, we are reaching out to stakeholders who are likely to have such information with a PAD Questionnaire (attached). The questionnaire will help identify whether you have information that is relevant to this relicensing process. Your responses are an important and helpful part of preparing a comprehensive PAD and are very much appreciated.

If possible, we would like to have the questionnaire responses back by February 28, 2021, but that date is flexible so let us know if it is problematic for any reason.

Please feel free to contact me at (770) 270-7348 with any questions about the attached PAD Questionnaire or the relicensing process for the Rocky Mountain Pumped Storage Project. Please also reach out with any questions about the types of data that would be helpful in preparing the PAD.

I look forward to hearing from you about any data you may have to offer.

Sincerely,



Craig Jones

Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-04





OglethorpePower

An Electric Membership Corporation

January 19, 2021

Certified Mail/ Return Receipt #
7019 1120 0000 1736 6066

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

Dear Mr. Hoskin:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-05





January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5783

Ms. Elizabeth Toombs
THPO
Cherokee Nation
P.O. Box 948
Tahlequah, OK 74465-0948

Dear Ms. Toombs:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

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Craig Jones
Director, Environmental Affairs

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Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-06





OglethorpePower

An Electric Membership Corporation

January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5790

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

Dear Mr. Sickey:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Craig Jones

Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-08





January 19, 2021

Certified Mail/ Return Receipt #
7020 0640 0001 1375 3935

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

Dear Dr. Langley:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

- c: Mr. Keith Russell (Oglethorpe) (w/att.)
- Mr. Jim Messersmith (Oglethorpe) (w/att.)
- Ms. Suzanne Roberts (Oglethorpe) (w/att.)
- Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-07





January 19, 2021

*Certified Mail/ Return Receipt #
7019 1640 0001 6084 5820*

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

Dear Mr. Townsend:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-10





January 19, 2021

**Certified Mail/ Return Receipt #
7019 1640 0001 6084 5806**

Mr. Richard Sneed
Principal Chief
Eastern Band of Cherokee
P.O. Box 1927
Cherokee, NC 28719

Dear Mr. Sneed:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

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Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-09





January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5813

Mr. Brian Givens
Town King
Kialegee Tribal Town
P.O. Box 332
Wetumka, Ok 74883-0332

Dear Mr. Givens

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Craig Jones
Director, Environmental Affairs

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Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-11





OglethorpePower

An Electric Membership Corporation

January 19, 2021

*Certified Mail/ Return Receipt #
7019 1640 0001 6084 5844*

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

Dear Ms. Lowe-Zepeda:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

- c: Mr. Keith Russell (Oglethorpe) (w/att.)
- Mr. Jim Messersmith (Oglethorpe) (w/att.)
- Ms. Suzanne Roberts (Oglethorpe) (w/att.)
- Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-13





OglethorpePower

An Electric Membership Corporation

January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5837

Mr. David Hill
Principal Chief
Muscogee Creek Nation
P.O. Box 580
Okmulgee, OK 74447

Dear Mr. Hill

Subject: Pre-Application Document Questionnaire for FERC Relicensing

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Sincerely,

Craig Jones
Director, Environmental Affairs

- c: Mr. Keith Russell (Oglethorpe) (w/att.)
- Mr. Jim Messersmith (Oglethorpe) (w/att.)
- Ms. Suzanne Roberts (Oglethorpe) (w/att.)
- Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-12





January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5868

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

Dear Mr. Osceola:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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Sincerely,

Craig Jones
Director, Environmental Affairs

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Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-14





An Electric Membership Corporation

January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5851

Mr. Theodore Isham
THPO
Seminole Tribe of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Dear Mr. Isham:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

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I look forward to hearing from you about any data you may have to offer.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Jones".

Craig Jones
Director, Environmental Affairs

C: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-15





OglethorpePower

An Electric Membership Corporation

January 19, 2021

Certified Mail/ Return Receipt #
7019 1640 0001 6084 5899

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

Dear Mr. Morrow:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

The PAD is intended to provide detailed information about the project early in the process and comprises a description of the project and relevant information about the project environment and resources to facilitate the identification of issues and information needs. OPC plans to distribute the PAD next summer to federal and state resource agencies, Indian tribes, local governments, and members of the public likely to be interested in the proceeding. To help ensure that we are including the requisite project information, we are reaching out to stakeholders who are likely to have such information with a PAD Questionnaire (attached). The questionnaire will help identify whether you have information that is relevant to this relicensing process. Your responses are an important and helpful part of preparing a comprehensive PAD and are very much appreciated.

If possible, we would like to have the questionnaire responses back by February 28, 2021, but that date is flexible so let us know if it is problematic for any reason.

Please feel free to contact me at (770) 270-7348 with any questions about the attached PAD Questionnaire or the relicensing process for the Rocky Mountain Pumped Storage Project. Please also reach out with any questions about the types of data that would be helpful in preparing the PAD.

I look forward to hearing from you about any data you may have to offer.

Sincerely,


Craig Jones
Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-16





January 19, 2021

Certified Mail/ Return Receipt #

7020 0640 0001 1374 1017

Mr. Joe Bunch
Chief
United Keetoowah Band Cherokee
P.O. Box 746
Tahlequah, Ok 74465

Dear Mr. Bunch

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

The PAD is intended to provide detailed information about the project early in the process and comprises a description of the project and relevant information about the project environment and resources to facilitate the identification of issues and information needs. OPC plans to distribute the PAD next summer to federal and state resource agencies, Indian tribes, local governments, and members of the public likely to be interested in the proceeding. To help ensure that we are including the requisite project information, we are reaching out to stakeholders who are likely to have such information with a PAD Questionnaire (attached). The questionnaire will help identify whether you have information that is relevant to this relicensing process. Your responses are an important and helpful part of preparing a comprehensive PAD and are very much appreciated.

If possible, we would like to have the questionnaire responses back by February 28, 2021, but that date is flexible so let us know if it is problematic for any reason.

Please feel free to contact me at (770) 270-7348 with any questions about the attached PAD Questionnaire or the relicensing process for the Rocky Mountain Pumped Storage Project. Please also reach out with any questions about the types of data that would be helpful in preparing the PAD.

I look forward to hearing from you about any data you may have to offer.

Sincerely,

Craig Jones
Director, Environmental Affairs

- c: Mr. Keith Russell (Oglethorpe) (w/att.)
- Mr. Jim Messersmith (Oglethorpe) (w/att.)
- Ms. Suzanne Roberts (Oglethorpe) (w/att.)
- Mr. Rick Hayes (Oglethorpe) (w/att.)

ENV-RM-21-17



**Oglethorpe Power Corporation
Rocky Mountain Pumped Storage Project (FERC Project No. 2725)**

Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (Project) (FERC Project No. 2725). The Rocky Mountain Project is a 904-megawatt pumped storage project located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. Beginning in 2021, OPC will formally commence the FERC relicensing process by filing a Notice of Intent (NOI) to relicense the Project and by distributing a Pre-application Document (PAD) to Federal and state resource agencies, Indian tribes, local governments, and members of the public likely to be interested in the proceeding. The PAD will compile existing, relevant, and reasonably available information pertaining to the Project. This information will be used throughout the proceeding to help identify resource issues and related information needs, develop study plans, and analyze any Project impacts.

Through this PAD Questionnaire, OPC is seeking the input of interested stakeholders to help identify sources of existing, relevant, and reasonably available resource information pertaining to the Project. Your responses will provide OPC with valuable information for preparing a comprehensive PAD.

Please fill out and return this questionnaire to Steve Layman by email (Steven.Layman@KleinschmidtGroup.com). You may also email any comments and/or questions to Steve Layman at the email address above. Thank you for your time and attention to this matter.

Contact Information for person completing the questionnaire:

Name & Title: _____
Organization: _____
Address: _____

Phone: _____
Email _____
Address: _____

**Oglethorpe Power Corporation
Rocky Mountain Pumped Storage Project (FERC Project No. 2725)**

Pre-Application Document Questionnaire for FERC Relicensing

- 2(d) Please provide the name(s) of any specific representative(s) of your organization other than yourself you wish to designate for a potential follow-up contact by OPC or OPC's representative for the resource area(s) checked above. *(Additional contacts may be provided on a separate page.)*

Representative Contact Information

Name & Title: _____
Address: _____

Phone: _____
Email _____
Address: _____

Name: _____
Address: _____

Phone: _____
Email _____
Address: _____

- 2(e) Are you aware of any specific Project-related issues pertaining to the resource area(s) listed in 2(a) above? *(Additional information may be provided on a separate page.)*

Yes *(Please list specific issues below.)* No

<u>Resource Area</u>	<u>Specific Issue</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

3. Do you or does your organization plan to participate in the relicensing process?

Yes No

March 16, 2021

Certified Mail/ Return Receipt #

7019 1640 0002 0581 8093

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

Dear Mr. Harjo:

Subject: Pre-Application Document Questionnaire for FERC Relicensing

Oglethorpe Power Corporation (OPC) is preparing to relicense its Rocky Mountain Pumped Storage Project (FERC Project No. 2725). The project has an installed capacity of 904 megawatts and is located about 10 miles northwest of the City of Rome in Floyd County, Georgia. The original Federal Energy Regulatory Commission (FERC) license expires December 31, 2026. As you may be aware, project relicensing is a multi-year process that begins with OPC filing a Notice of Intent (NOI) to seek a new license and Pre-Application Document (PAD) with FERC and providing copies to stakeholders for their review and comment.

The PAD is intended to provide detailed information about the project early in the process and comprises a description of the project and relevant information about the project environment and resources to facilitate the identification of issues and information needs. OPC plans to distribute the PAD next summer to federal and state resource agencies, Indian tribes, local governments, and members of the public likely to be interested in the proceeding. To help ensure that we are including the requisite project information, we are reaching out to stakeholders who are likely to have such information with a PAD Questionnaire (attached). The questionnaire will help identify whether you have information that is relevant to this relicensing process. Your responses are an important and helpful part of preparing a comprehensive PAD and are very much appreciated.

If possible, we would like to have the questionnaire responses back by April 30, 2021, but that date is flexible so let us know if it is problematic for any reason.

Please feel free to contact me at (770) 270-7348 with any questions about the attached PAD Questionnaire or the relicensing process for the Rocky Mountain Pumped Storage Project. Please also reach out with any questions about the types of data that would be helpful in preparing the PAD.

I look forward to hearing from you about any data you may have to offer.

Sincerely,



Craig Jones
Director, Environmental Affairs

c: Mr. Keith Russell (Oglethorpe) (w/att.)
Mr. Jim Messersmith (Oglethorpe) (w/att.)
Ms. Suzanne Roberts (Oglethorpe) (w/att.)
Mr. Rick Hayes (Oglethorpe) (w/att.)

Distribution:

Olivia Saye (w/att./File)
Correspondence File

Central & Compliance File:

RM-1800.04 (w/att.)
RM-1000.02



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

Attachment A

Affidavit of Publication and Ad Text

AFFIDAVIT OF PUBLICATION

State of Georgia, } S.S.

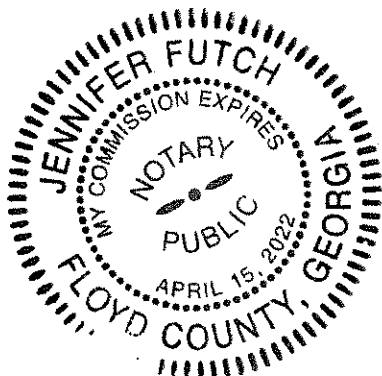
County of Floyd

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



Jennifer Futch
Notary 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 be 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

December 17, 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
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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.

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

December 17, 2021

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.

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

December 17, 2021

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.

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

December 17, 2021

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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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

December 17, 2021

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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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

December 17, 2021

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.

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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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

December 17, 2021

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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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

December 17, 2021

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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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

Elizabeth Toombs
Cherokee Nation
P.O. Box 948
Tahlequah, 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
Jim Messersmith
Toni Presnell

December 17, 2021

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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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Harry ,

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

December 17, 2021

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

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Jamie,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Bruce,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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

December 17, 2021

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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Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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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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

December 17, 2021

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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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

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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 Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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

December 17, 2021

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,

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
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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

December 17, 2021

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,

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

December 17, 2021

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,

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

December 17, 2021

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

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

Dear Jeff,

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

December 17, 2021

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

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

Dear Mike,

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

December 17, 2021

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.

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

Courtenay O'Mara
Georgia Power Company (c/o Southern Company Generation)
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
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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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Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Brian,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Corain,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear LeeAnne,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Bob,

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

December 17, 2021

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,

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

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Marcellus,

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

December 17, 2021

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

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

Dear Theodore,

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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

December 17, 2021

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
Jim Messersmith
Toni Presnell

December 17, 2021

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

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

Dear Joe,

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

December 17, 2021

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.

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

December 17, 2021

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,

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Best regards,



Craig A. Jones, PhD
Director, Environmental Policy

CJ/dy

CC: Mike Price
Jim Messersmith
Toni Presnell

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.

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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



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

WILDLIFE RESOURCES DIVISION

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.

- l. 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,¹ 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: [image001.jpg](#)

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 Thlopthlocco 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

sig



From: [McCaslin, Tyler](#)
To: [Steven Layman](#); "Kelly Kirven"
Cc: [Jones, Craig](#)
Subject: FW: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Joint Meeting
Date: Monday, February 21, 2022 5:52:00 PM
Attachments: [image001.png](#)

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: [Jones, Craig](#)
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: [image001.png](#)

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,

cj

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 <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

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 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,

cj

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

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' <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

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,

cj

From: Jones, Craig
Sent: Thursday, February 17, 2022 2:48 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

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 <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.

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 <James.Capp@dnr.ga.gov>; Booth, Elizabeth <Elizabeth.Booth@dnr.ga.gov>; Welte, Jennifer <Jennifer.Welte@dnr.ga.gov>; Zeng, Wei <Wei.Zeng@dnr.ga.gov>; Wiedl, Stephen <Stephen.Wiedl@dnr.ga.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>

Subject: Rocky Mountain Join Consultation 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.

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

Attachment A

Affidavit of Publication and Ad Text

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



Jennifer Futch
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 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 Dr. Craig Jones, Director Environmental

Policy, (770) 270-7348; Craig.Jones@opc.com.

2:25, 2022

From: [McCaslin, Tyler](#)
To: "Booth, Elizabeth"
Bcc: [Jones, Craig](#); [Steven Layman](#); [Kelly Kirven](#)
Subject: RE: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Joint Meeting
Date: Wednesday, March 16, 2022 10:11:00 AM
Attachments: [image001.png](#)

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

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Welcome

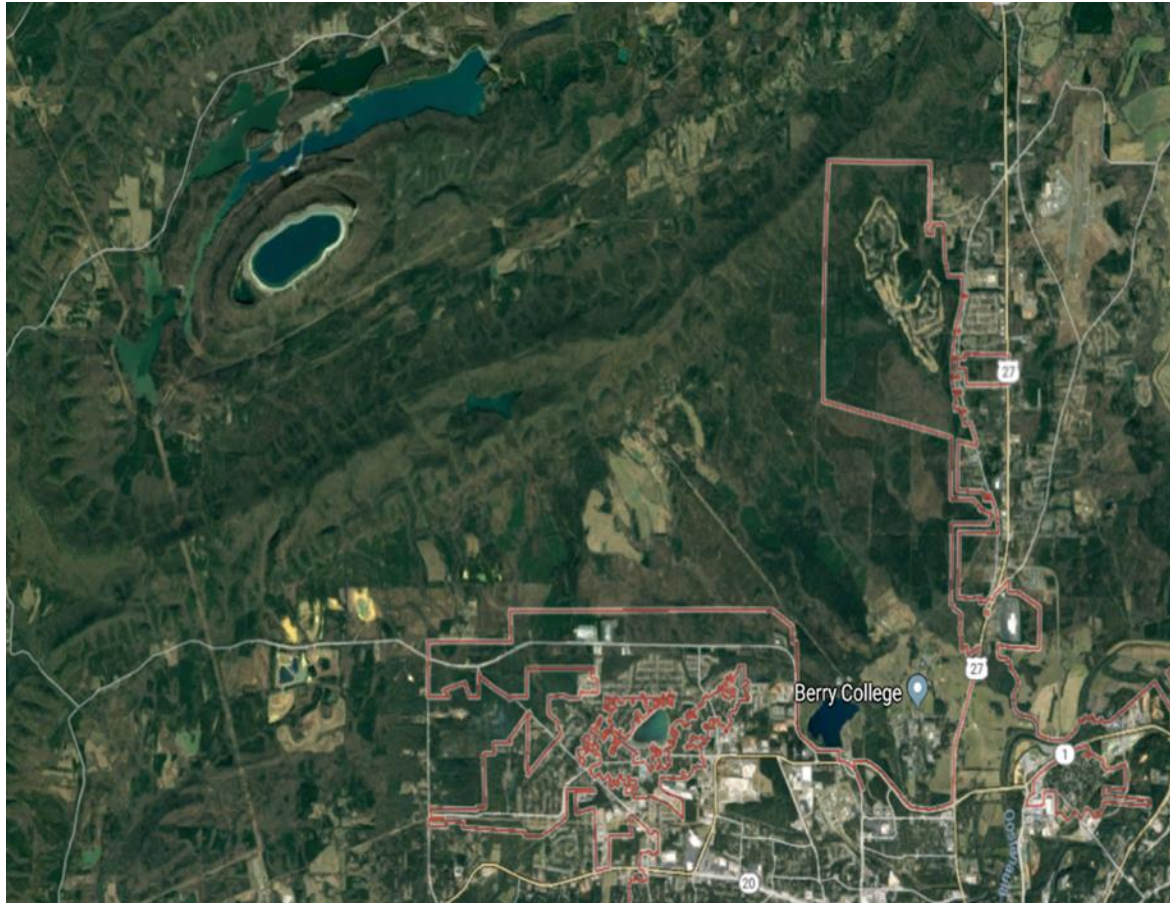
Rocky Mountain Pumped Storage Hydroelectric Project
FERC Relicensing (P-2725) - Joint Meeting and Virtual
Site Tour

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



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

Relicensing Schedule and Major Milestones – Tyler McCaslin

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

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

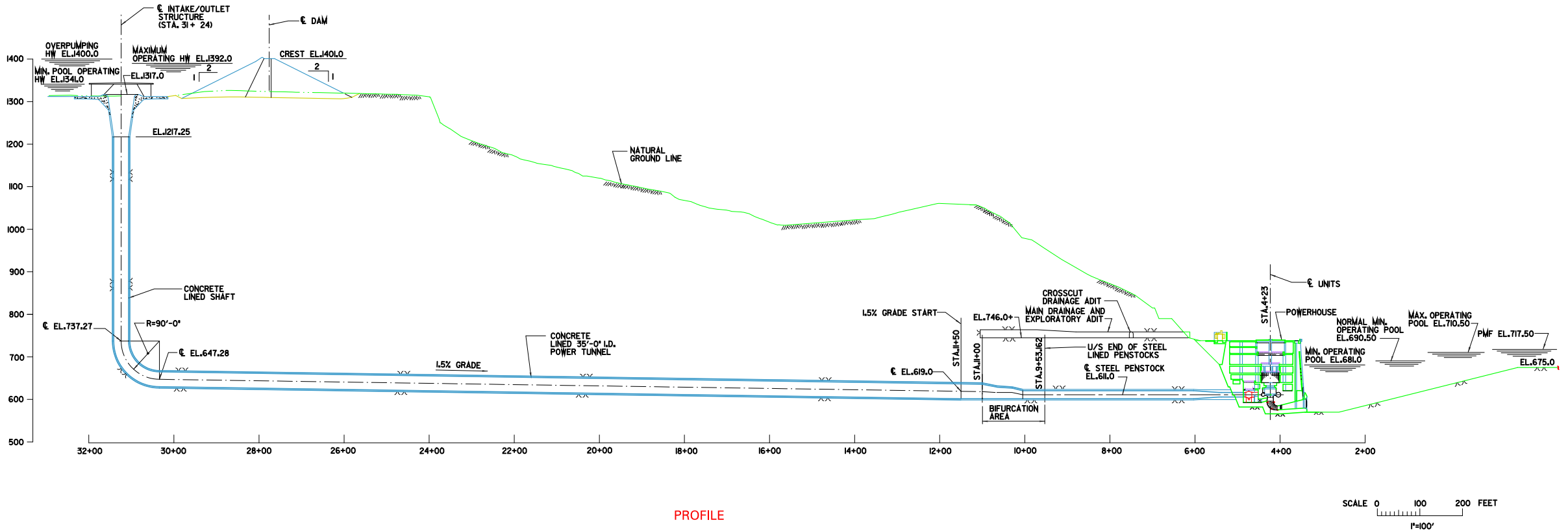
- Combination of several dams/structures
- 18,800 acre-feet of storage
- Reservoir and shoreline not accessible to the public

3. Auxiliary Pools

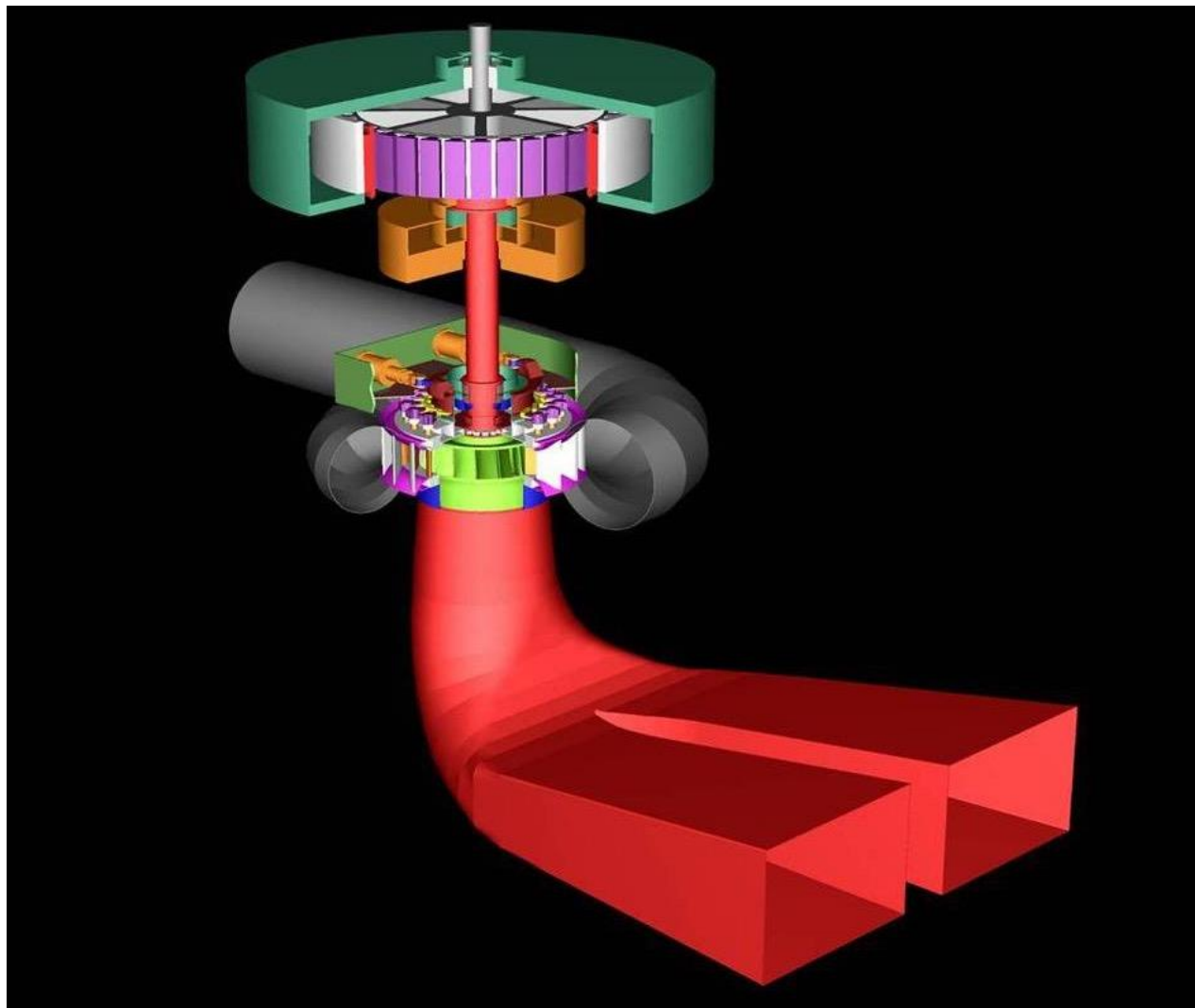
- 2 pools totaling 5,800 acre-feet of storage for recreation and drought reserves
- Accessible to the public for camping, picnicking, swimming, hiking, biking, boating, and fishing



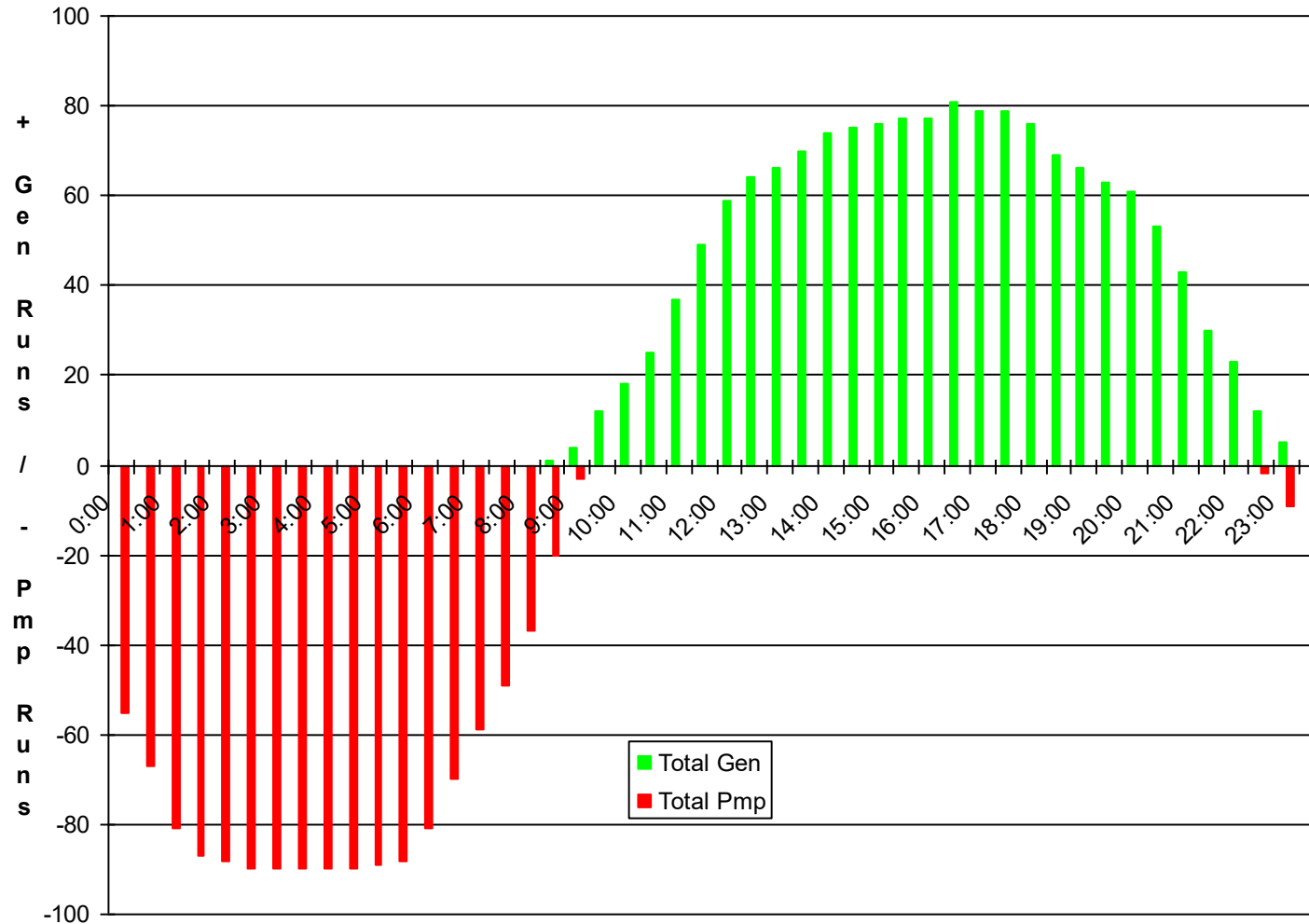
Water Passage Profile



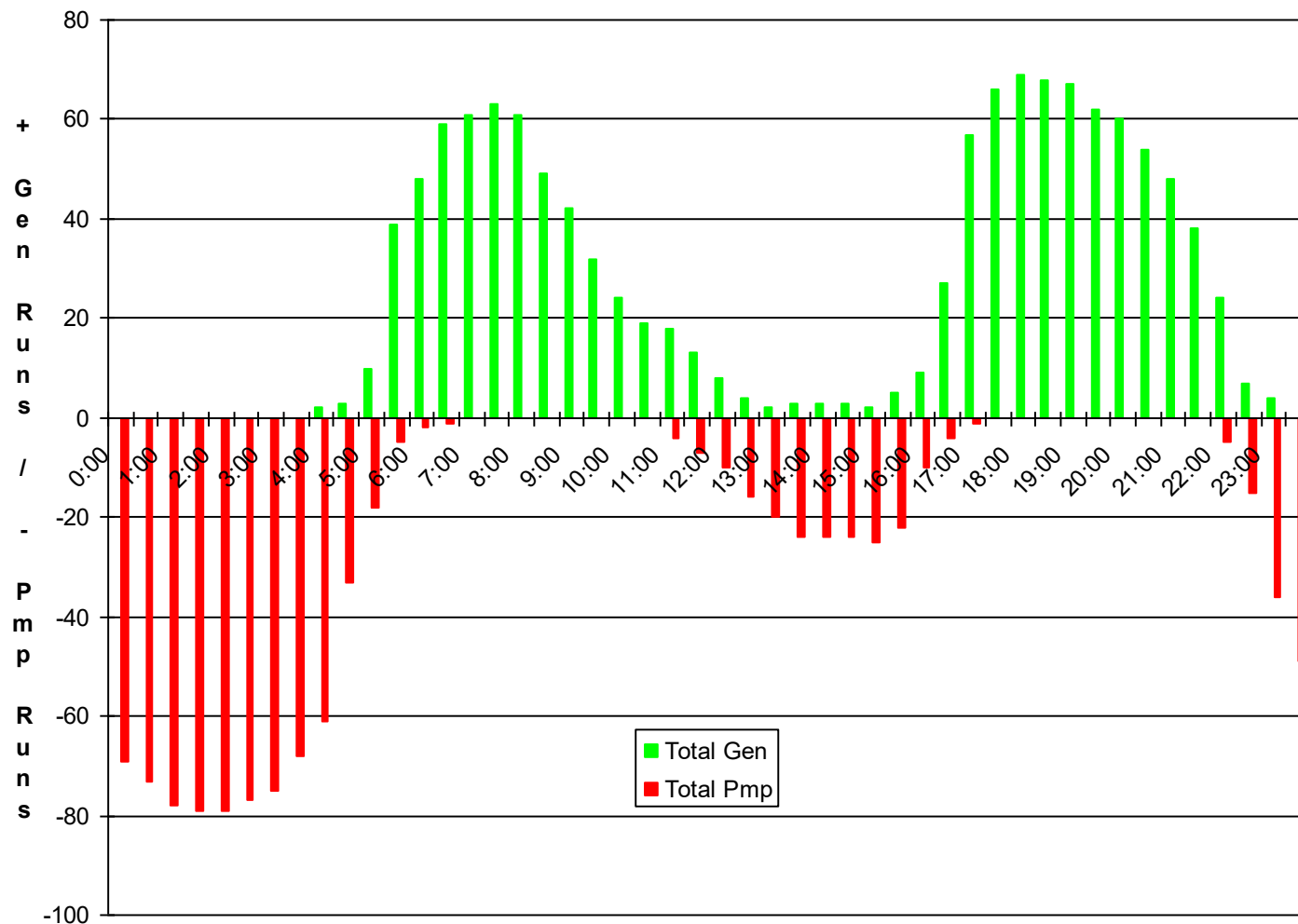
Unit Profile



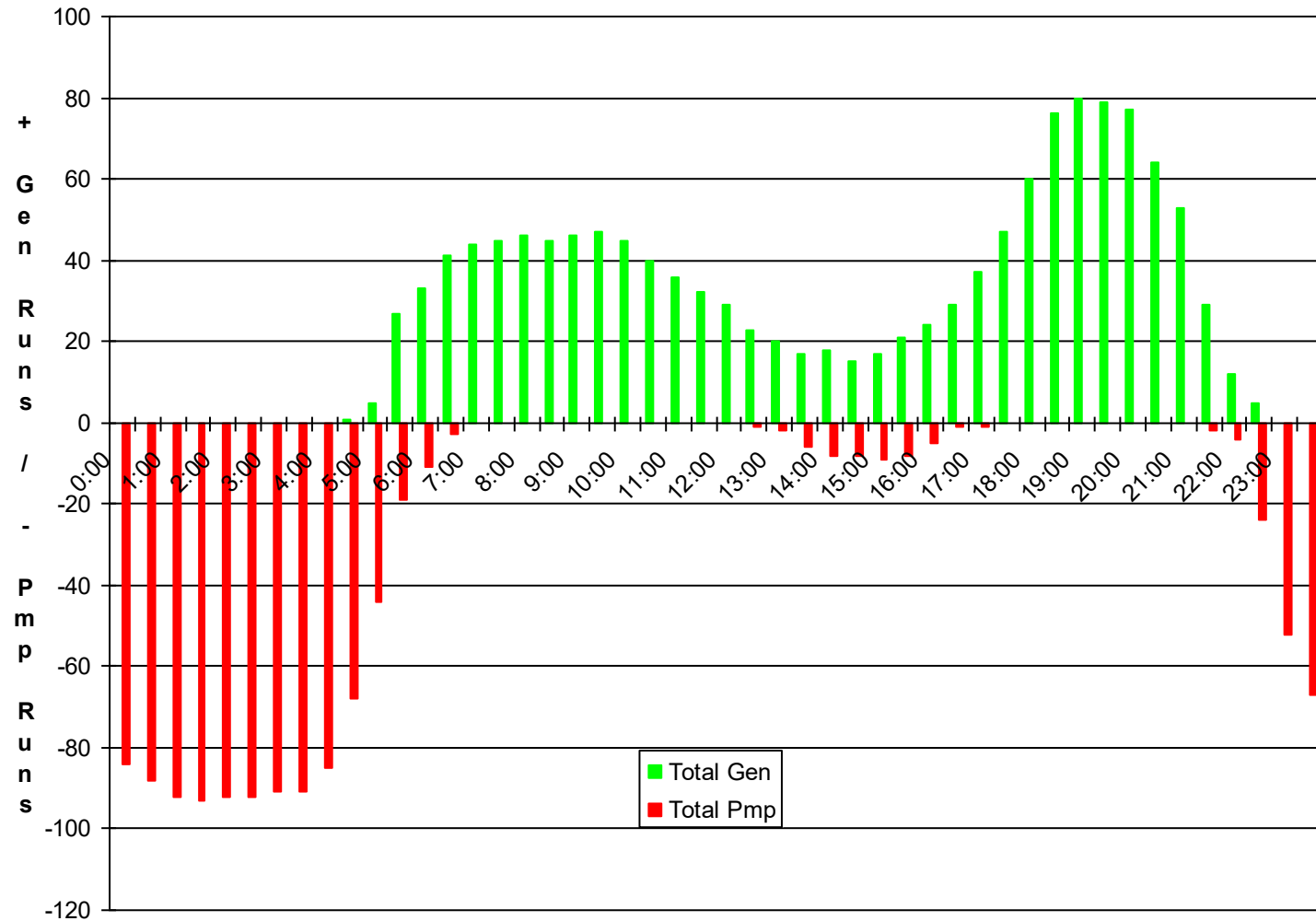
August Unit Operation



December Unit Operation



March Unit Operation





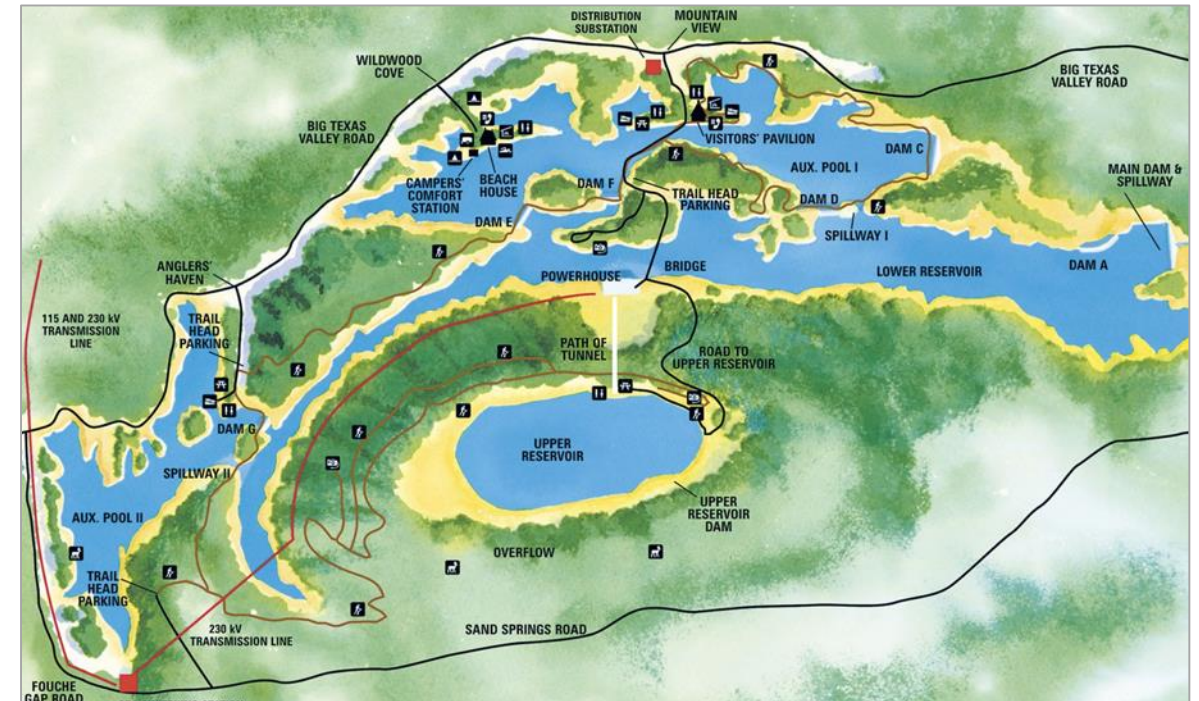
Virtual Site Tour

<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





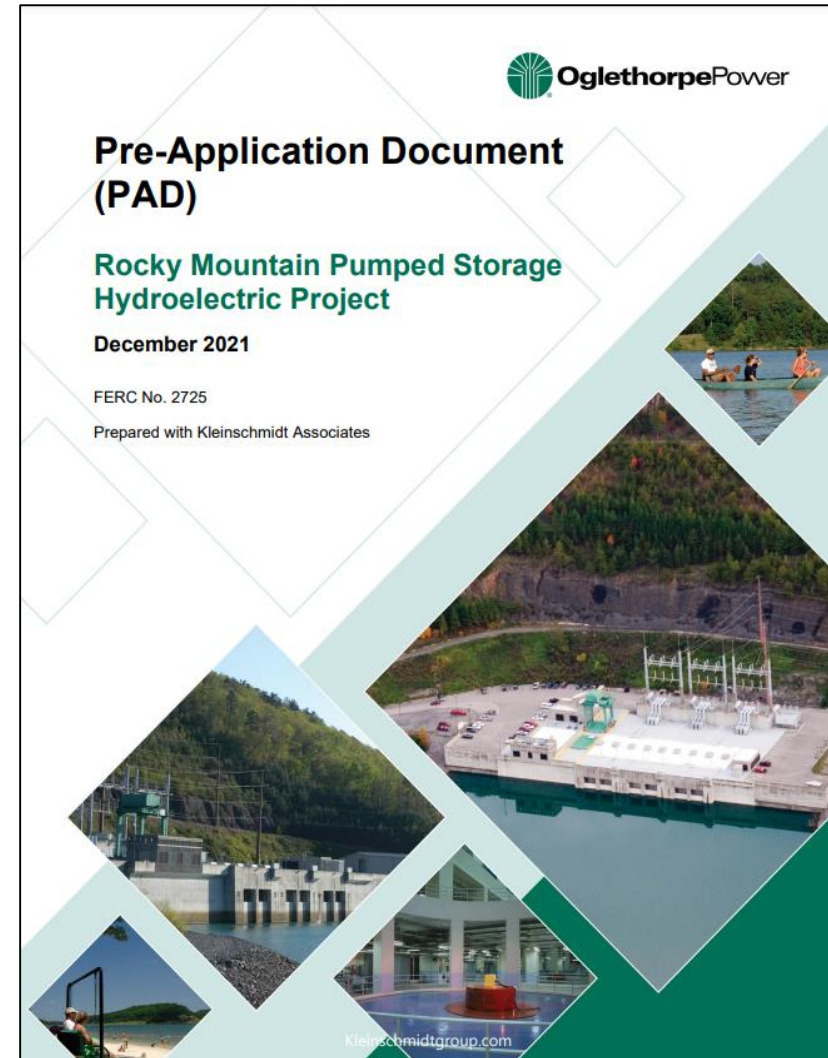
Overview of Pre-Application Document and Proposed Studies

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



Relicensing Study Requests, 18 CFR § 5.9 (b)

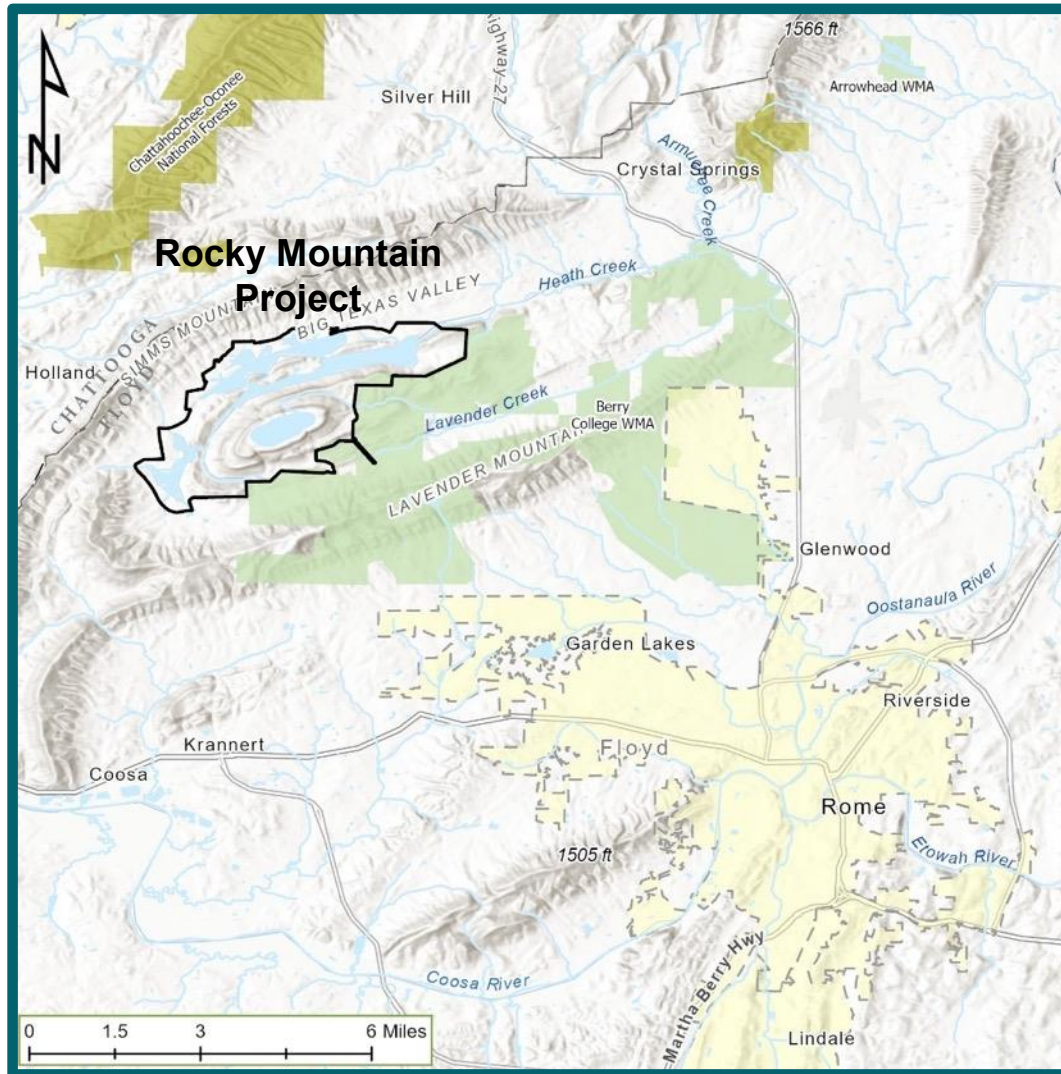
- (1)** Describe the goals and objectives of each study proposal and the information to be obtained;
- (2)** If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;
- (3)** If the requester is not a resource agency, 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.

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

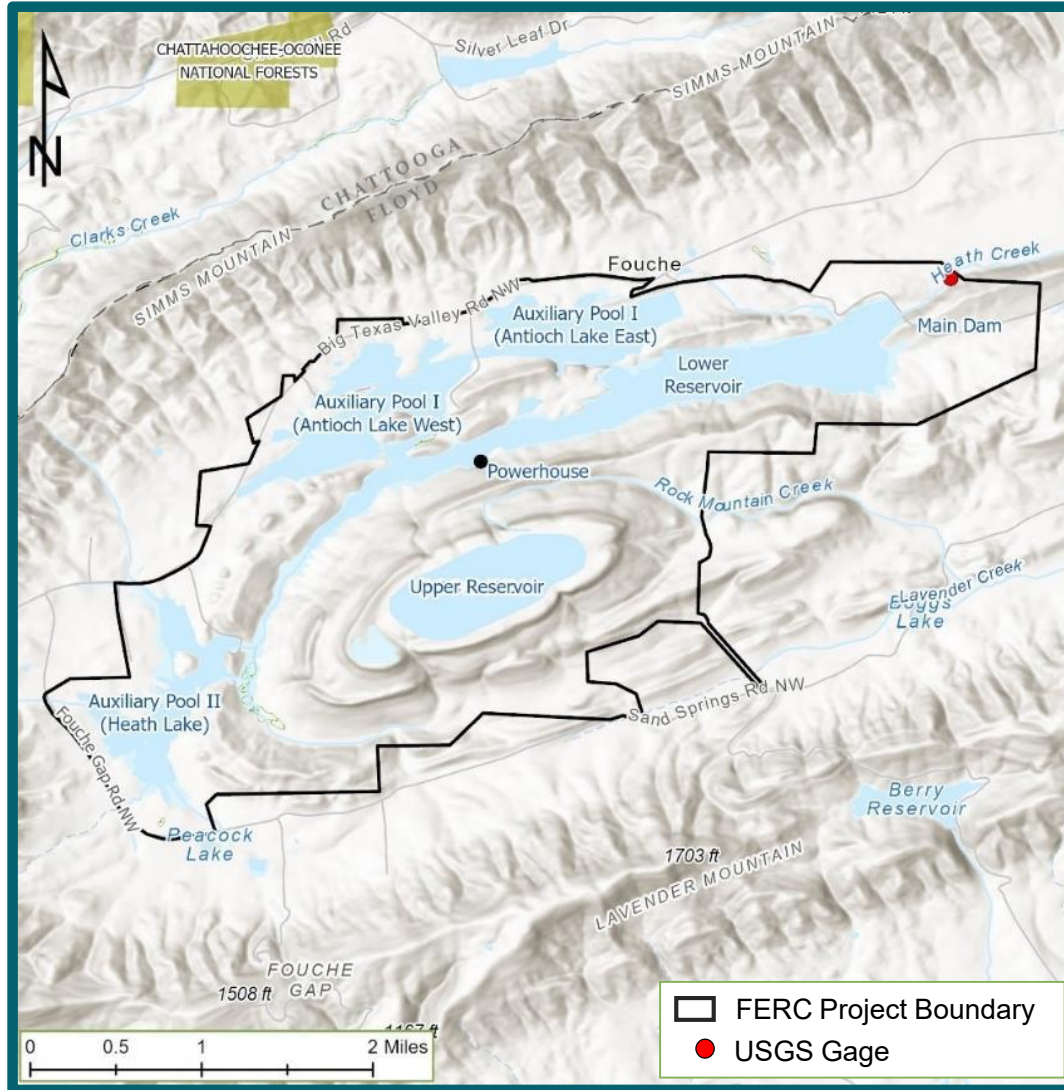


Source: U.S. Army Corps of Engineers (2014)

- ▶ 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

Rocky Mountain Project Boundary



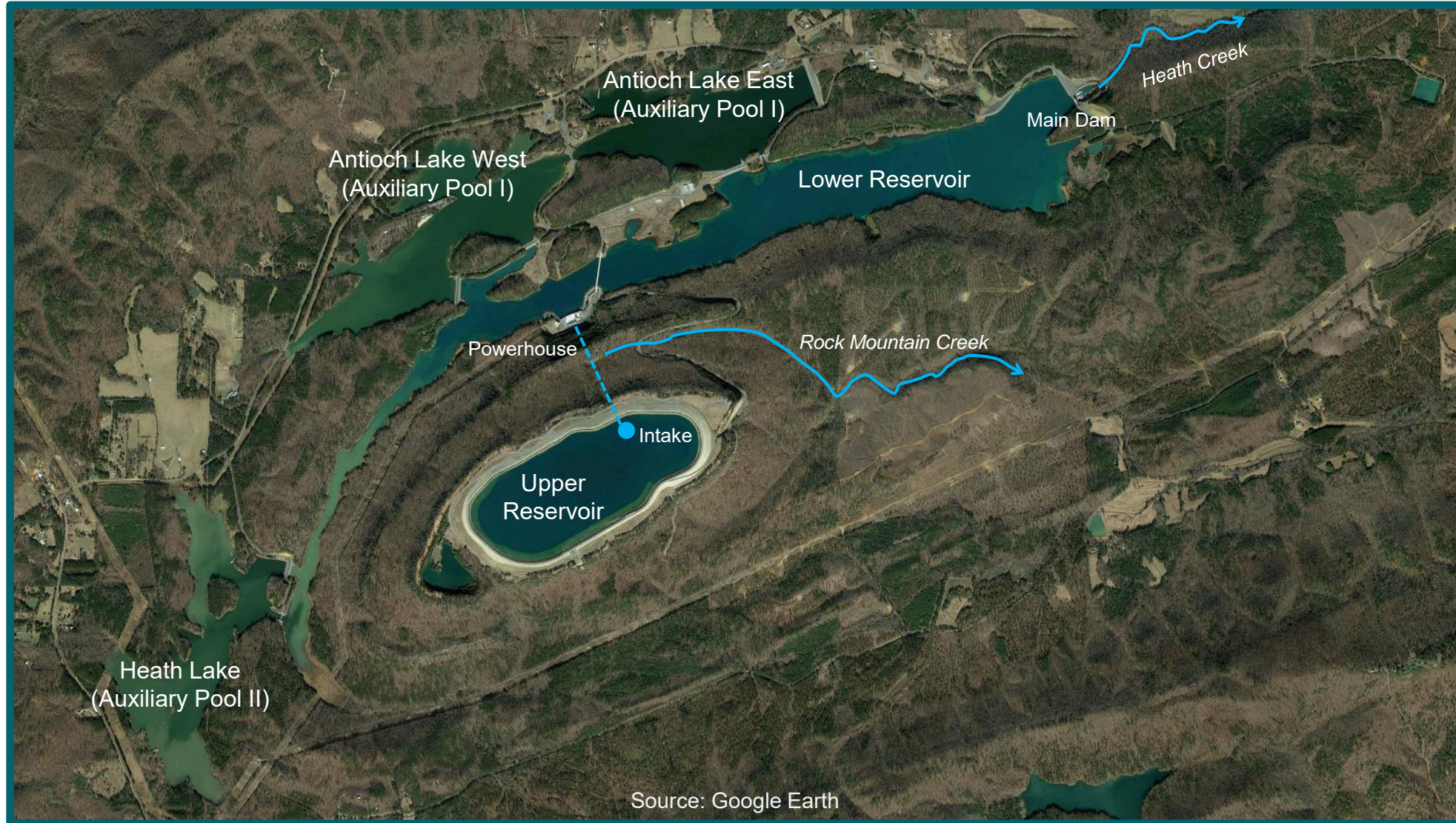
- ▶ Encompasses 5,000 acres of land and water
- ▶ Extends to about 0.3 mi downstream on Heath Creek
- ▶ Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- ▶ Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek

Water Resources

Steve Layman, Kleinschmidt



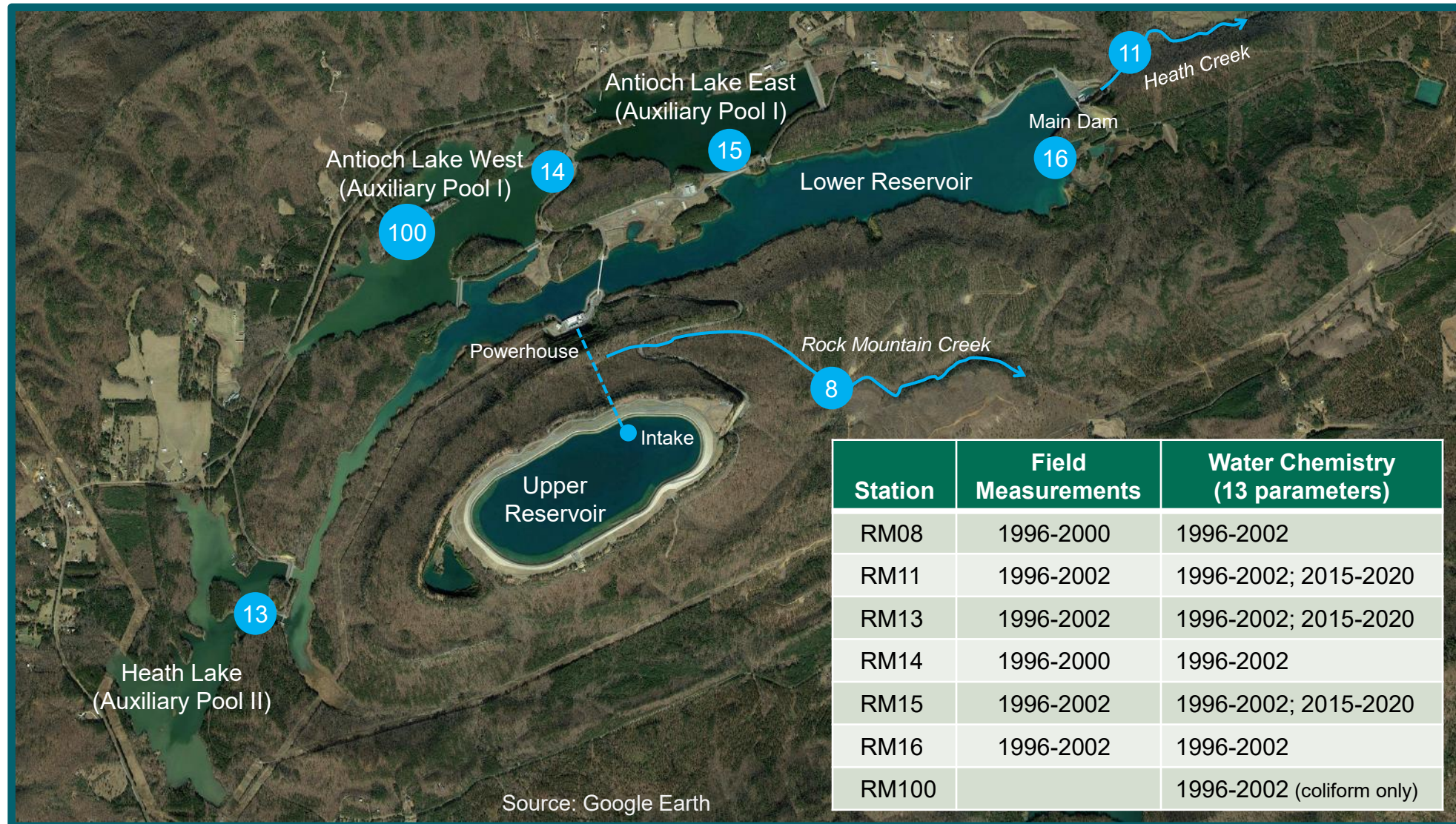
Rocky Mountain Project Waters



Beneficial Uses of Project Waters

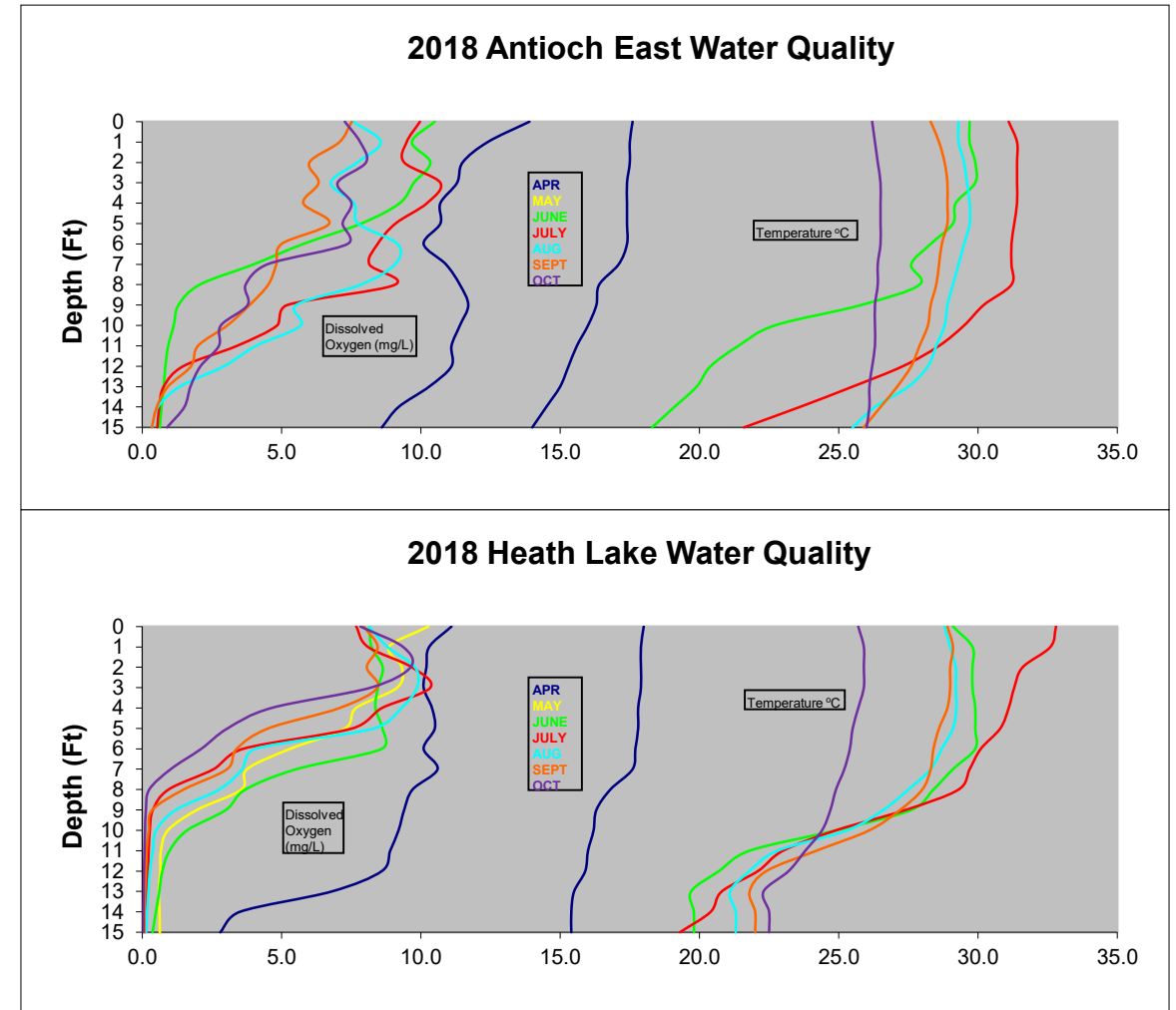
Waterbody	Designated Use	Use Attainability Status
Lower Reservoir	Fishing	(not available for public use)
Upper Reservoir	Fishing	(not available for public use)
Antioch Lake (Auxiliary Pool I)	Recreation	Supporting
Heath Lake (Auxiliary Pool II)	Recreation	Assessment pending
Heath Creek downstream of 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



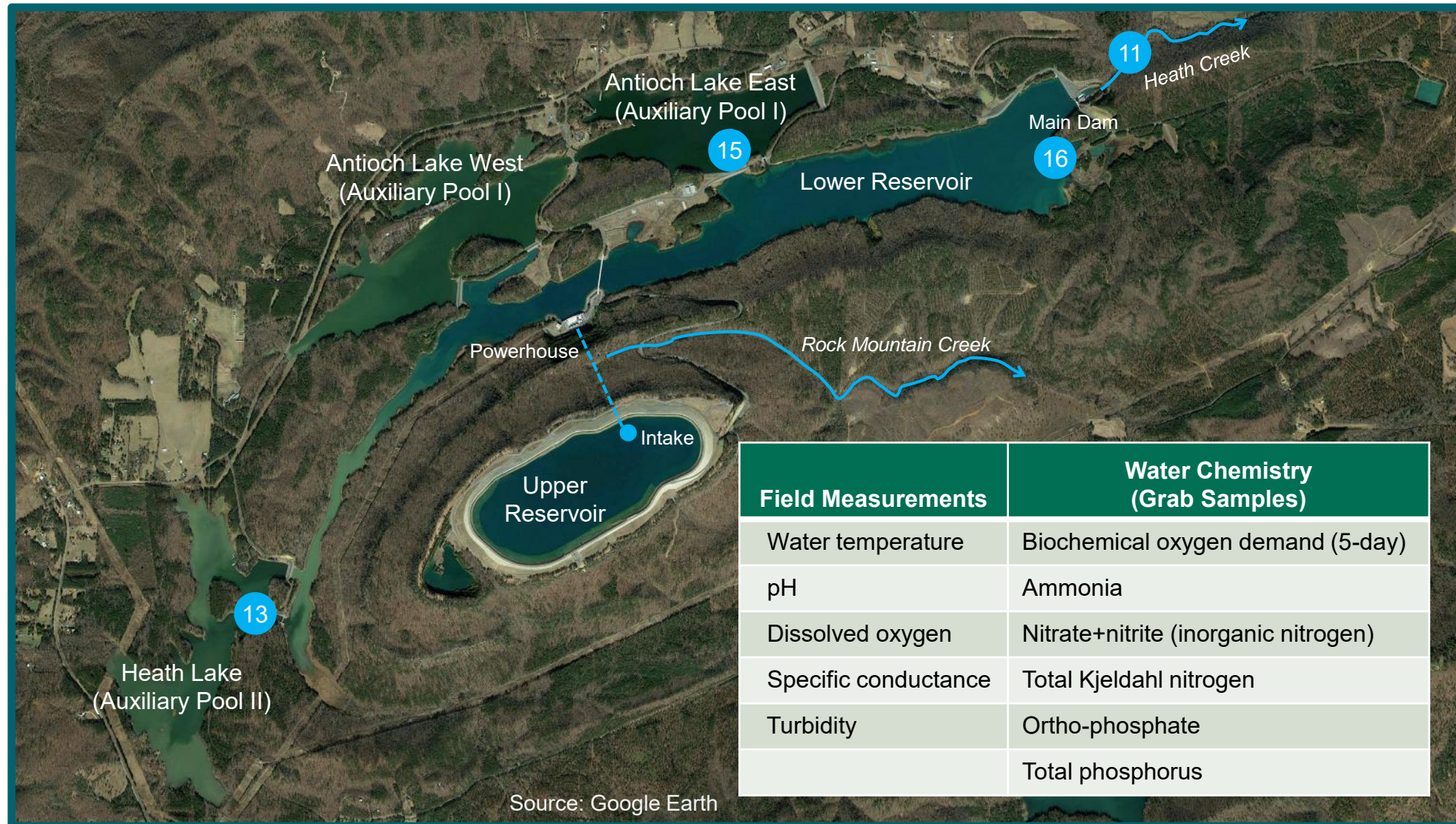
Heath Creek Minimum Flow Release Study

- ▶ 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

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

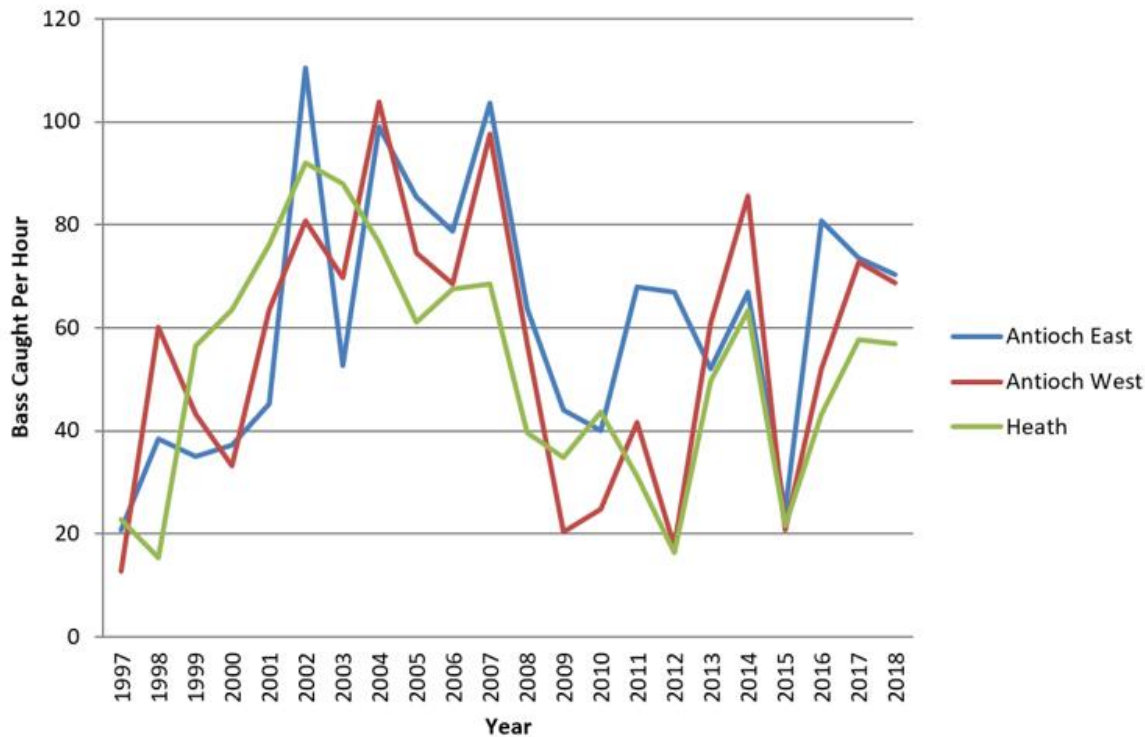
Fish and Aquatic Resources

Steve Layman, Kleinschmidt



Rocky Mountain Recreation and Public Fishing Area (PFA)

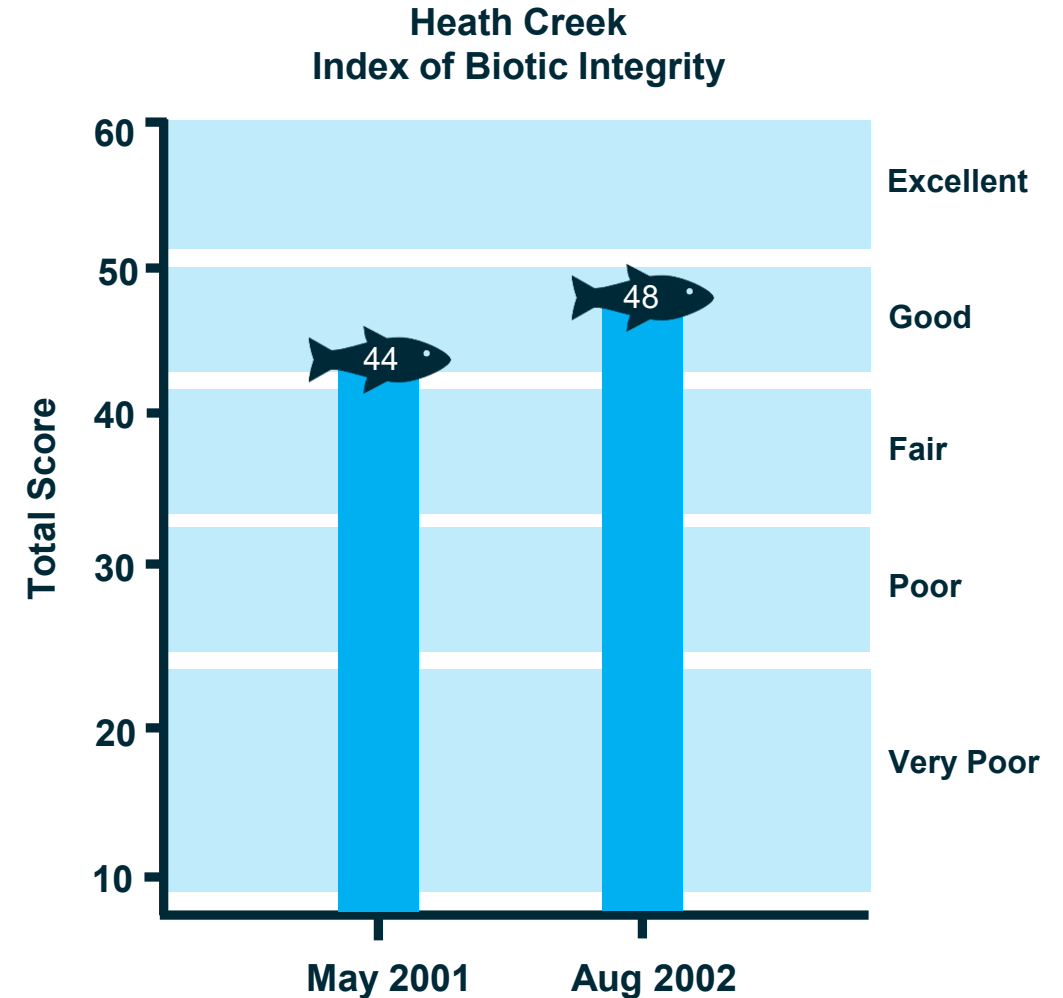
Largemouth Bass Annual Electrofishing Catch Rates, 1997-2018



- ▶ 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

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 least-disturbed 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

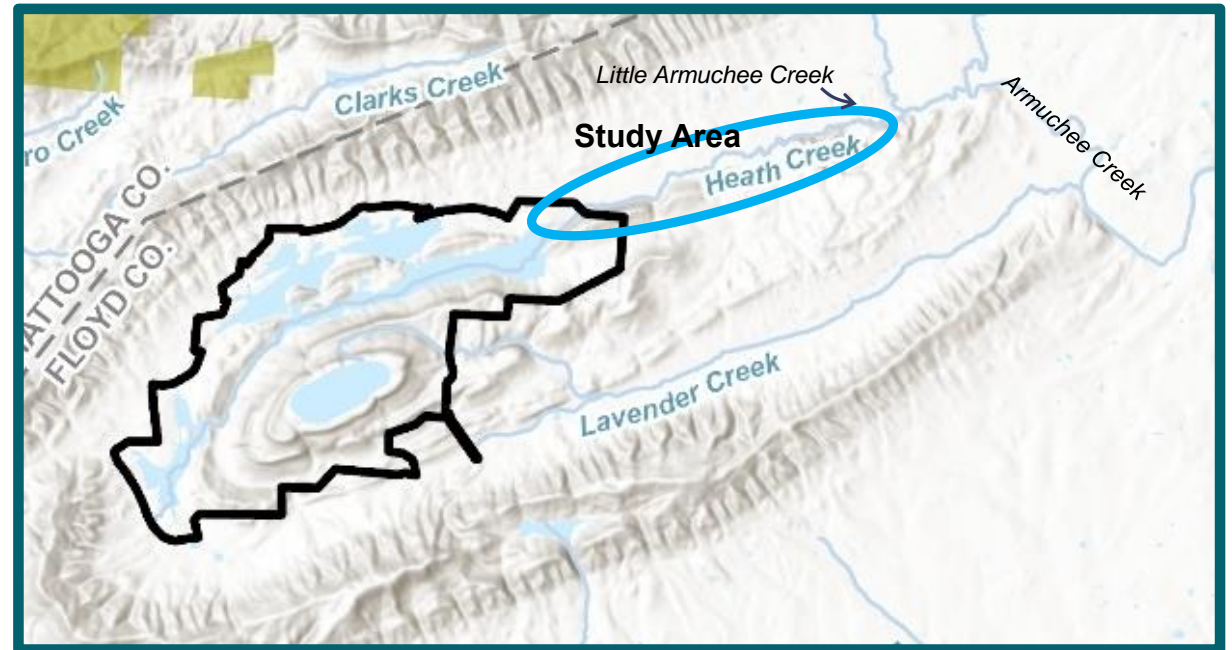
Scientific Name	Common Name	Georgia Status	Federal Status
Fish			
<i>Etheostoma ditrema</i>	Coldwater darter	R	
<i>Etheostoma rupestre</i>	Rock darter	R	
<i>Hybobopsis lineapunctata</i>	Lined chub	R	
<i>Moxostoma carinatum</i>	River redhorse	R	
<i>Notropis asperifrons</i>	Burrhead shiner	T	
Freshwater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

* 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



Wildlife, Botanical, and Wetland Resources

Steve Layman, Kleinschmidt



Wildlife and Botanical Resources

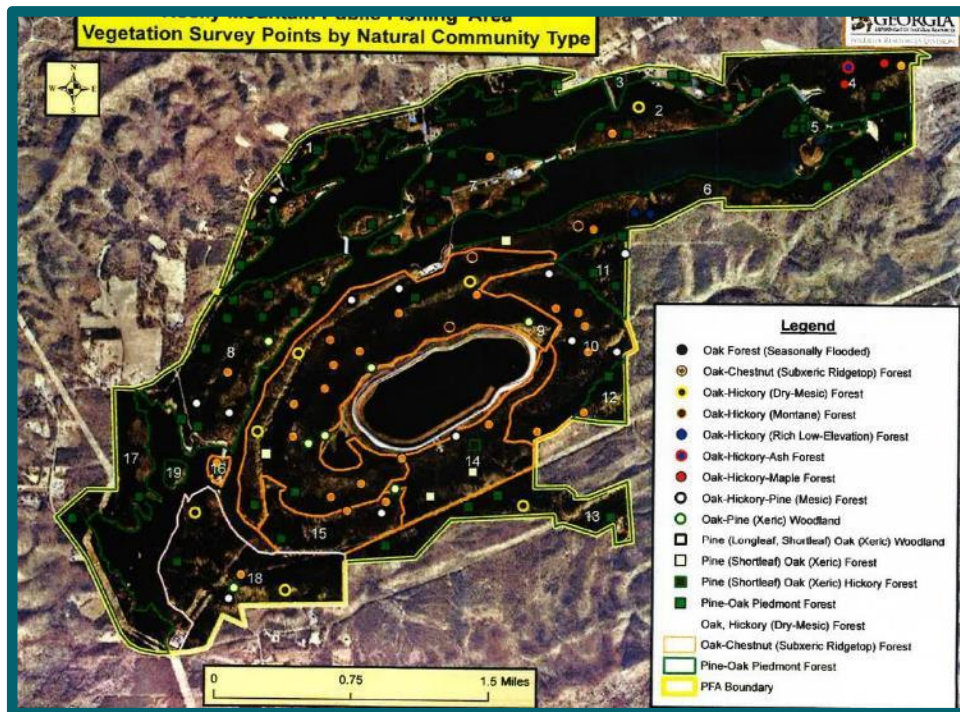
- ▶ Terrestrial vegetation and wildlife representative of Ridge and Valley province
- ▶ Predominant forest types are pine-oak, chestnut oak, and oak-hickory
- ▶ One active bald eagle nesting territory within project boundary
- ▶ Green salamander, a Georgia rare species, occurs among boulders and cliffs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



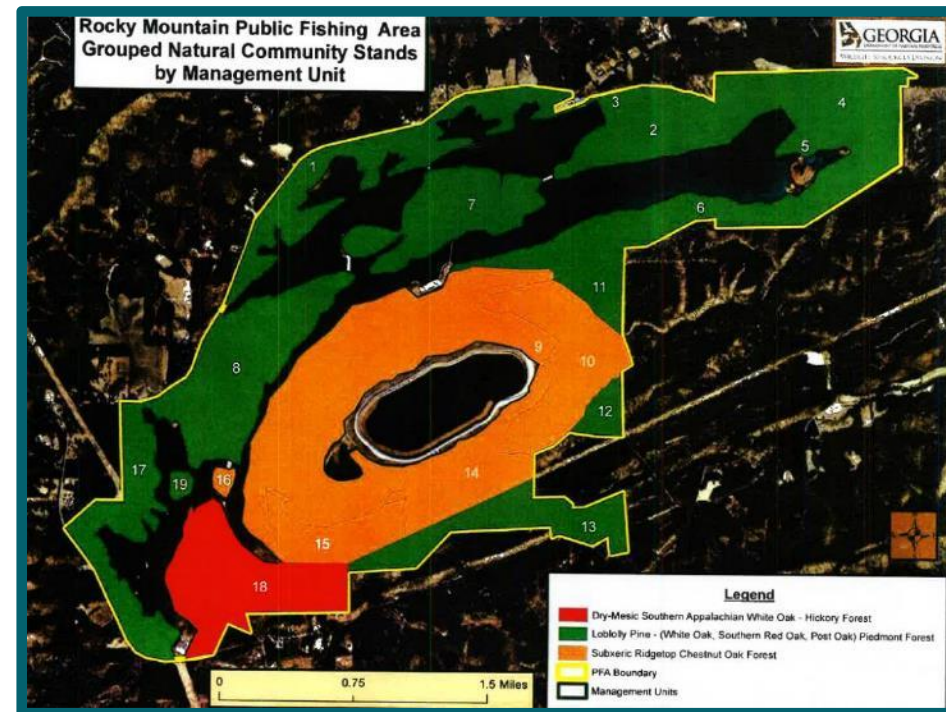
Photo by John Jensen, GDNR

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			
<i>Arabis georgiana</i>	Georgia rockcress	T	LT
<i>Clematis socialis</i>	Alabama leatherflower	E	LE
<i>Helianthus verticillatus</i>	Whorled sunflower	E	LE
<i>Marshallia mohrii</i>	Mohr's Barbara's-buttons	T	LT
<i>Scutellaria montana</i>	Large-flowered skullcap	T	LT
<i>Xyris tennesseeensis</i>	Tennessee yellow-eyed grass	E	LE
Insect			
<i>Danaus plexippus</i>	Monarch butterfly		C
Mammals			
<i>Myotis grisescens</i>	Gray bat	E	LE
<i>Myotis septentrionalis</i>	Northern long-eared bat	E	LT



Eric Frommer, CC BY-SA 2.0

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

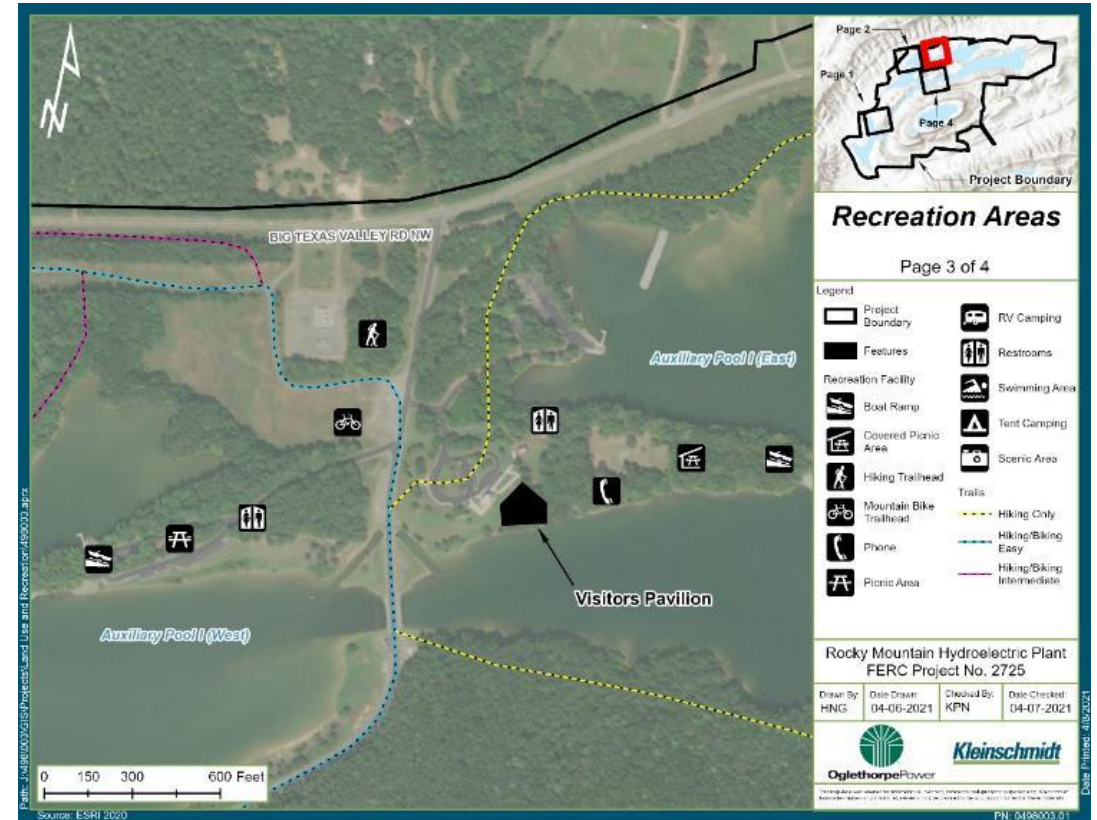
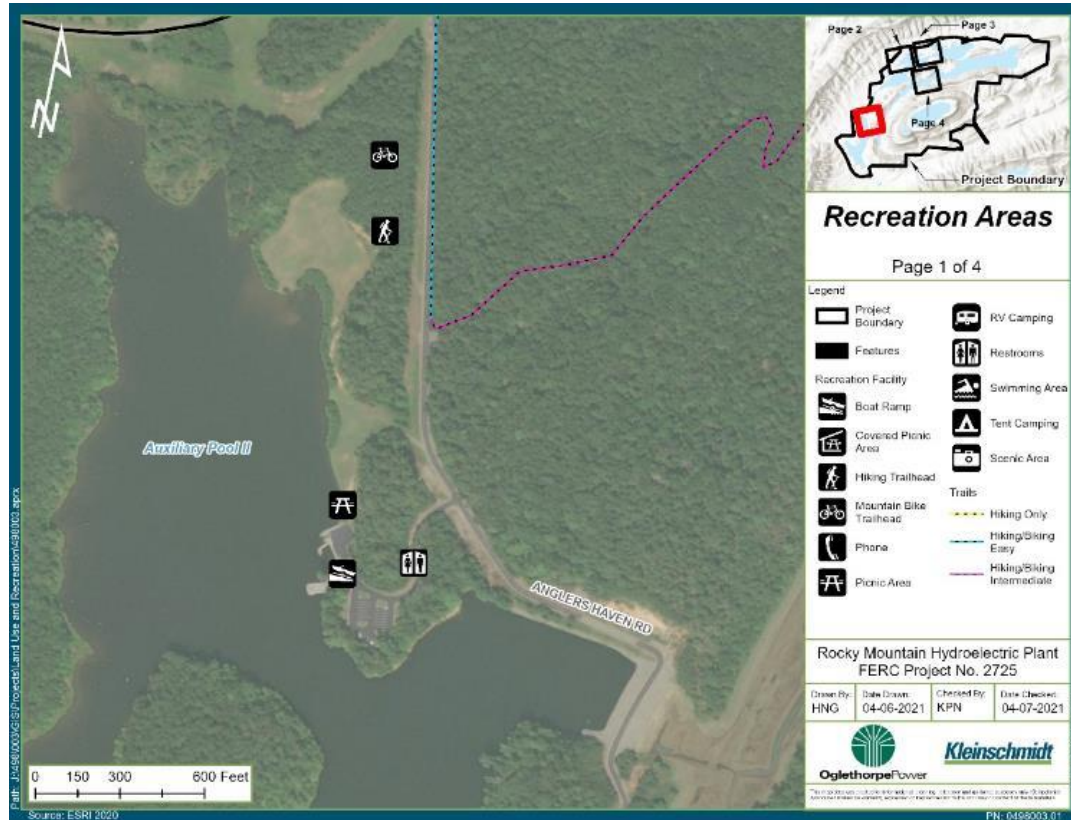


Recreation Resources

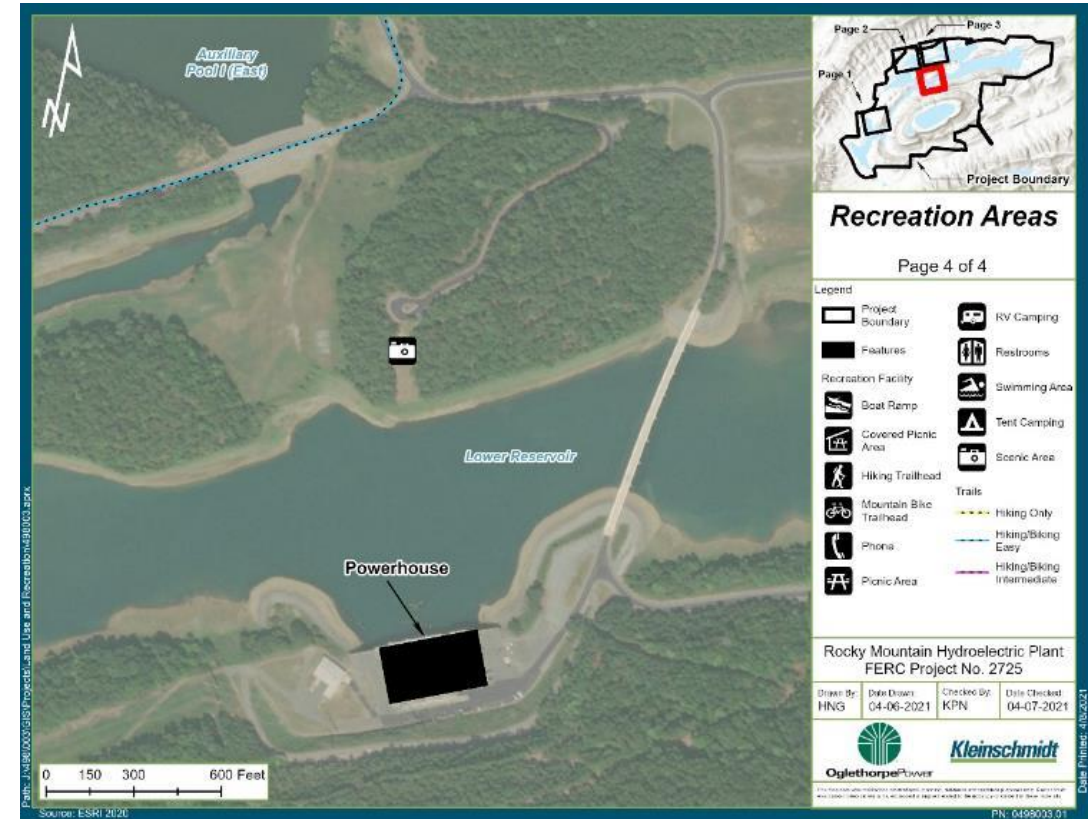
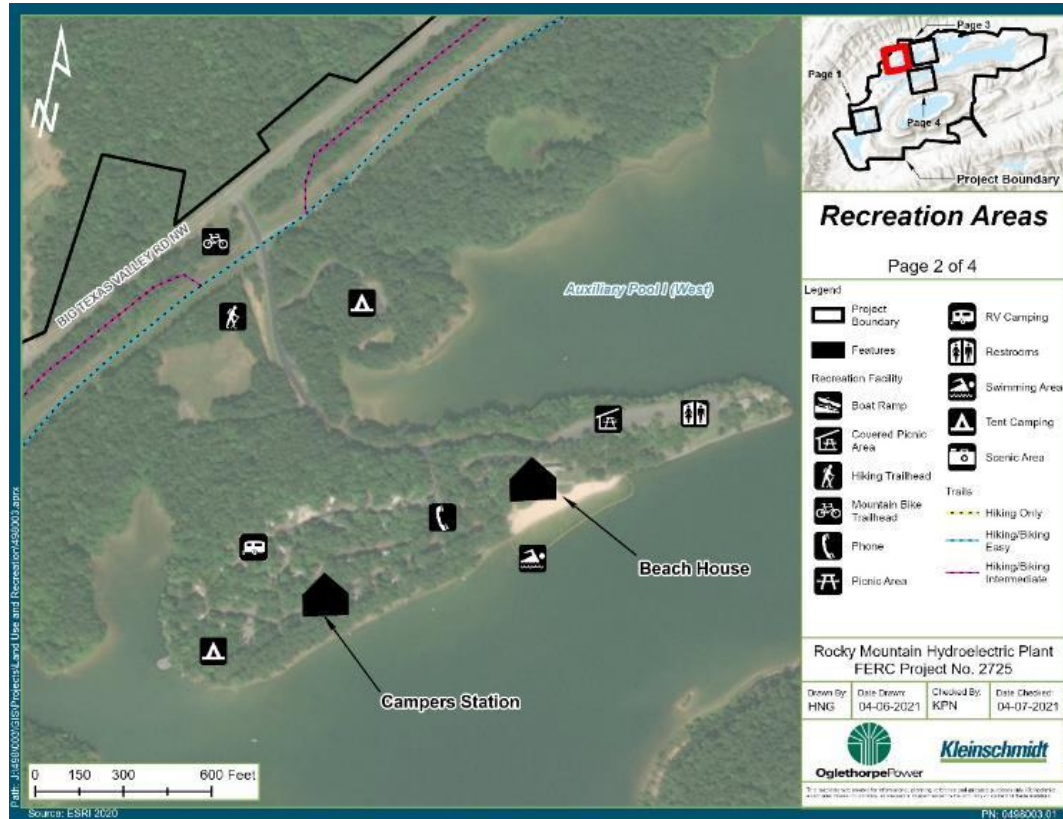
- ▶ 3,700 acres of land and water available for public recreation activities at the Rocky Mountain Public Fishing Area (PFA)
 - Auxiliary Pool I (includes Antioch Lake East and Antioch Lake West)
 - Auxiliary Pool II (Heath Lake)
- ▶ No recreational use on the Upper and Lower Reservoirs and associated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



Recreation Resources



Recreation Resources *(continued)*



Auxiliary Pool I

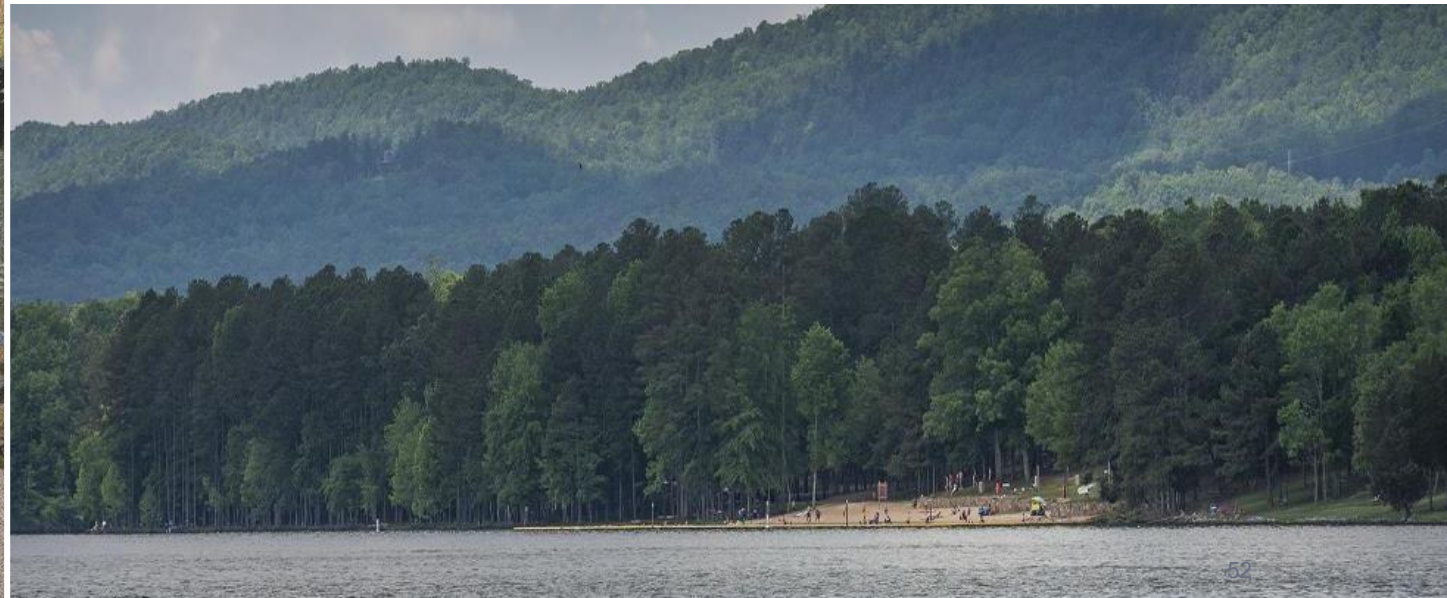
Antioch Lake East

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



Antioch Lake West

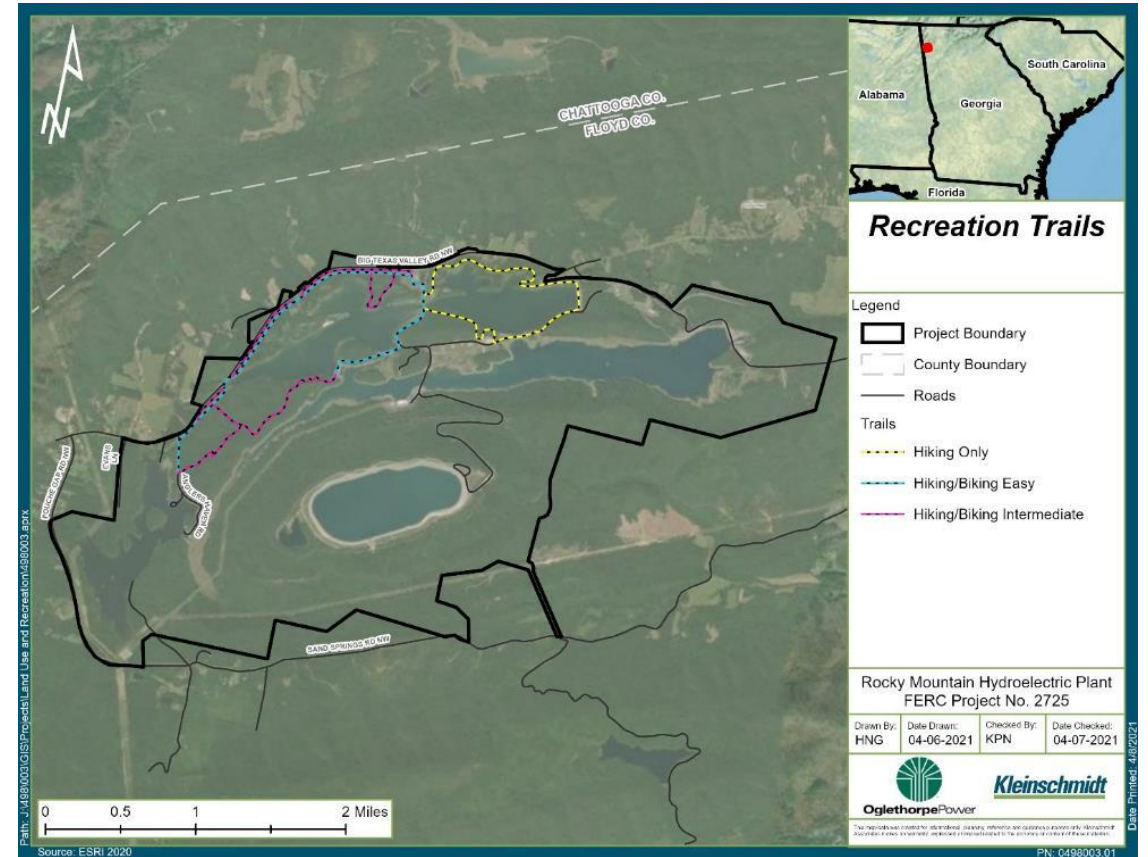
- ▶ Swimming Beach with Sand Beach, Bathhouse, Restrooms
- ▶ Picnic Area with Group Shelter, Tables, Grills
- ▶ Boating Area with Parking, Concrete Boat Launch, Courtesy Dock, Picnic Area
- ▶ Family Camping Area
- ▶ Group Camping Area



Auxiliary Pool II

Heath Lake

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



PFA Recreation Use

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

MONTH	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.

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

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

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

Cultural Resources



The Cargle/Cordle Store


Illustration featuring the store and Cargle homestead by Robert Redden, 1901. The Cargle homestead is still standing today.


Originally located at the corner of Old Fouché Gap Road and Big Texas Valley Road, this building dates back to 1844 and served as a marketplace for local valley residents.

The store was originally owned and operated by the Rev. Will Cordle, who served as pastor of Sand Springs Baptist Church for many years.

The building changed hands several times before Melvin Cargle purchased the property in 1942. He owned the building until the land was purchased by Oglethorpe Power.

At the rear of the building is framing for a porch that was level with horse-drawn wagons for use during loading and unloading.

After the store closed, the building was used as a hay barn before its relocation to the current site.



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

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

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

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ROCKY MOUNTAIN PUMPED STORAGE HYDROELECTRIC PROJECT
FERC RELICENSING (P-2725)
JOINT MEETING AND VIRTUAL SITE TOUR

Moderated by Craig Jones
Wednesday, March 16, 2022
2:01 p.m.

Remote Proceeding
Roswell, GA 30075

Reported by: Deidra Musick Nash
JOB NO.: 5133017

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A P P E A R A N C E S

List of Attendees:

Craig Jones, Director of Environmental Policy with
Ogelthorpe Power (by videoconference)

Steven Layman, Aquatic Biologist Project Manager for
Kleinschmidt (by videoconference)

Tyler McCaslin, Environment Specialist with Ogelthorpe
Power (by videoconference)

Rick Hayes, Plant Manager for Ogelthorpe Power (by
videoconference)

Wei Zeng, Georgia EPD (by videoconference)

John Faustini, Fish and Wildlife (by videoconference)

Jackson Sibley, GDNR Fisheries Biologist (by
videoconference)

Kelly Kirven, Kleinschmidt (by videoconference)

Jim Hakala, GDNR (by videoconference)

Ben Murray, Rome-Floyd Chamber of Commerce (by
videoconference)

Heather Teilhet, Ogelthorpe Power (by videoconference)

Toni Presnell, Ogelthorpe Power (by videoconference)

Public Meeting

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Mr. Steven Layman	33, 44
Ms. Kelly Kirven	56, 67

Public Meeting

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P R O C E E D I N G S

1
2 MR. JONES: So good afternoon,
3 everyone, and welcome to our Rocky Mountain
4 Relicensing meeting and virtual site tour. I'm Craig
5 Jones and I'm the Director of Environmental Policy
6 with Ogelthorpe Power and I'm going to be your host
7 and facilitator for today's meeting. I do want to say
8 up front that this meeting is being recorded and
9 transcribed for our -- for our records and for our
10 consultation record for FERC.

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

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

1 remain muted while you're not speaking.

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

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

1 And then Tyler, Steve, Kelly, did
2 I -- did I miss anything?

3 MR. LAYMAN: I don't think so. That's
4 good.

5 MR. JONES: All right. Thank you.

6 So I am going to take control of the
7 slides so that I can advance them. There we go. So
8 here's our agenda for today's meeting.

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
14 environment. So we began that effort with the filing
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
18 of, this is the best we can do for now and -- and a
19 virtual site tour. We do plan to -- to maybe have
20 a -- a real site tour at some point in the -- in the
21 near future and we look forward to the opportunity to
22 do that. But today's meeting is to really have an
23 active discussion for the Pre-Application Document.

24 And since interactions are challenging
25 in a virtual forum like this, what I'm going to do is

1 I'm going to ask you to drop your name and affiliation
2 into the chat rather than just doing a round robin.
3 That way, we'll have a full record for the transcript
4 and you all can see who's attending. I'll ask for the
5 recording -- I will ask for the recording and
6 transcript that if you do speak during the meeting,
7 please begin with your name and affiliation so that we
8 can capture that for the recording and transcript as
9 well. And I know I've got -- so I've got Heather
10 Teilhet from -- from Ogelthorpe on the phone and I
11 believe Toni Presnell is on the phone from Ogelthorpe
12 as well, so -- so Tyler or -- actually, Eric, would
13 you please drop their names into the chat so
14 that -- so we've got that for the record. And then if
15 there's anybody else on the phone, would you please
16 break in and -- and let us know?

17 Okay. So hearing none, we'll -- we'll
18 begin today's presentation with a -- with a brief
19 history of Rocky Mountain, an overview of the
20 relicensing process, project operations, a virtual
21 site tour, an overview of the resource areas that are
22 described in the Pre-Application Document and how they
23 informed our relicensing study proposals, which is
24 really where we'll provide plenty of opportunity to
25 ask questions and provide any feedback that you have

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

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

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

1 come.

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

8 So first, and the reason that we are
9 here today is that Rocky Mountain is licensed by the
10 Federal Energy Regulatory Commission or FERC, more on
11 what that means in -- in a moment. But first, the
12 project license is -- basically includes the -- the
13 terms and conditions for -- for owning and operating
14 the project, including, among other things, how it
15 operates, any dam safety requirements, things like
16 recreation access, measures to protect, mitigate, or
17 enhance the environment, recreation and cultural
18 resources that -- that are affected by project
19 operations. So that's -- that's really what -- what a
20 license is and Rocky Mountain was originally licensed
21 for a term of 50 years to Georgia Power Company in
22 1977.

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

1 and we retain the responsibility for all aspects of
2 project operations, including licensing which is,
3 again, why we're -- why we're here today and
4 we're -- we're going through this consultation process
5 and this relicensing process. The project began
6 operating in 1995 and shortly after that, we entered
7 into an agreement with Georgia Department of Natural
8 Resources to manage the recreation, fish, and wildlife
9 resources associated with the project that are all
10 within -- situated within the project boundary. And I
11 do want to just pause and just mention that that has
12 been a really productive and good working relationship
13 with DNR and it is -- it's one of the reasons why we
14 were able to have a lot of good information in the
15 Pre-Application Document so we -- we appreciate that
16 partnership and appreciate working with GDNR
17 over -- over all these years. The license was amended
18 in 2005 to increase the project's capacity. That
19 allows us to deliver more power, basically, with the
20 same amount of water.

21 And Rick, if that's overly simplified
22 or not right, you can, you know, just ask you to clean
23 that up later if I -- if I got anything wrong.

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

1 operating the project, and we do, we are required to
2 file an application for a new license by December 31,
3 2024. Once we file that application, FERC will
4 conduct its own review, review for completeness and an
5 environmental review, and issue a new license order.
6 If -- if FERC doesn't issue the new license order by
7 December 31, 2026, they will automatically issue
8 annual licenses until -- until they're able to issue a
9 new license, which basically means that we continue to
10 operate with the terms and conditions of the existing
11 license until FERC issues -- issues a new one. The
12 new license application will include findings from our
13 relicensing studies, along with basic project
14 information and -- and those findings for the
15 relicensing studies will help identify those
16 project-related effects that will be addressed
17 in -- in a new license order.

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

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

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

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

1 commission both the NOI and -- and the PAD on December
2 10, 2021, and as I've mentioned, the PAD includes all
3 that -- all that resource information that we're going
4 to be talking a lot about today. Our NOI also
5 included a request to use the traditional licensing
6 process and FERC granted the use of that on January
7 26th twenty -- on January 26th of this year.

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

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

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

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

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

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

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

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

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

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

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

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

1 consultation that are required by the regulations.
2 I'll be talking about some additional opportunities
3 to -- to informally engage in consultation that we
4 believe is an important part of the process and which
5 I'll touch on when we -- when we talk about the next
6 steps toward the -- toward the end of the meeting and
7 in this presentation.

8 So now Tyler, I'm going to turn this
9 over to you for -- for time-wise. But there -- there
10 they are and I just -- I also just want to just pause
11 there too to see if there are any questions
12 about -- about the re-licensing process that I
13 can -- that I can answer at this time.

14 Okay. Tyler, go ahead.

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

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

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

16 MR. JONES: And -- thanks, Tyler.

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

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

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

25 MR. JONES: Okay. Rick --

Public Meeting

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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
6 Corporation. I am the Plant Manager at the Rocky
7 Mountain Pump Storage Hydroelectric Plant. I'm here
8 to kind of give you a kind of a project overview as to
9 what Rocky is all about and -- and what we do here.

10 So we have an install capacity of 904
11 megawatts. As Craig said, back in 2005 we did a -- a
12 license amendment to increase our capacity. We ended
13 up doing our ten-year overhauls which is part of our
14 plan to maintain Rocky Mountain. And at that time, we
15 replaced the water wheels, which we call the -- our
16 runners with more modern designed runners which gave
17 us the increase in performance power, pumping -- our
18 pumping flow and so forth and so on. So we took that
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.
24 We do daily load following to meet peak demand. We
25 have spinning and supplemental reserves as another one

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

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

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

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

3 So next slide, just to kind of give you
4 an idea of the main makeup of the project, you have
5 the Upper Reservoir. It's 120-foot high, continuous
6 earth, rock-filled dam. We have approximately
7 10,000-acre-feet of active storage.

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

18 The Lower Reservoir is a combination of
19 several dams and structures. The main one is the Main
20 Dam. It has our -- our release, water release areas
21 down there. The Lower Reservoir is about
22 19,000-acre-feet of storage. The reservoir and
23 shoreline are not accessible to the public.

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

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

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

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

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

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

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

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

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

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

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

1 MR. JONES: Great. Thanks, Rick. And
2 so as -- as Tyler is queuing up the -- our virtual
3 site tour, I just want to make another plug and
4 another announcement on that that we are going to send
5 out a notice to our distribution list and for those of
6 you who are -- are joining us today for the -- for the
7 first time and haven't been on our distribution list,
8 we're also going to include you on that invitation as
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,
18 I do want to mention also that if anybody had
19 any -- any audio or video trouble seeing that video,
20 we are going to have it posted, like I mentioned
21 earlier, on our website so you'll be able to see the
22 full video, and I do just want to give a shoutout to
23 our corporate communications team we've got.
24 That's -- that was well done.

25 MR. MCCASLIN: Well, we do have three

1 questions in chat so --

2 MR. JONES: Okay.

3 MR. MCCASLIN: -- I think they were
4 mostly addressed to Rick. So if you'd like to unmute,
5 Rick, would you like me to read out the questions
6 aloud?

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

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

14 MR. HAYES: So -- so the first one,
15 I -- I really don't have the exact answer for the
16 drainage area into -- into the Lower Reservoir or the
17 Project, so I'll have to get back to you on that as
18 far as exactly what it is. As far as the solar
19 question, yes, we have seen some -- some impact from
20 solar generation whereas they've taken -- when the sun
21 is shining, we've been pumping. So we have seen some
22 of that solar capacity come this way so that we
23 can -- so that we can store that solar energy in the
24 form of the water to higher or upper elevations and
25 then use it later in the day. So yes, we have seen

1 some impact from the increased solar capacity on
2 system.

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

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

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

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

1 you'll see more pumping during the day to store that
2 solar capacity as more of that comes on and -- and
3 more generation at night when the sun isn't shining.
4 So that's -- that's Rick's opinion as to what he
5 thinks is going to happen over the course of -- as
6 more of these renewables or primarily solar come
7 online.

8 MR. MCCASLIN: All right. That covers
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
14 Document and -- and we will double check on that. I
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
18 back to you on that and -- and confirm what it is.
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
25 have -- be able to address some of the -- the

1 watershed issues and the -- that the larger -- the
2 larger context of the area when he gets into his
3 presentation. So, okay, go ahead and wrap up Rick and
4 then we'll -- we'll --

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

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

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

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

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

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

11 Actually, have a picture of a young
12 lady who was out fishing for catfish, ended up
13 catching a 15-pound small -- or largemouth bass.
14 Quite -- quite a shock to her. A lot of recreation
15 resources hiking, biking, camping, and it's managed by
16 Georgia DNR and if you haven't been out here, come on
17 out.

18 Georgia DNR does a fantastic job
19 managing this facility. It is a great place to be.
20 Clean, well done, well kept, well managed. So that's
21 all I have unless there are any questions.

22 MR. JONES: Great. Thanks, Rick.

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

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

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

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

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

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

6 The intent of that is really to -- to
7 fill in for any gaps that are in the -- any
8 information in any gaps that -- that may -- that may
9 be there from -- from your review of our agency and
10 public review of our studies. When you do submit if
11 you do submit study requests, there are seven
12 criteria. I just want to throw these up here and I'm
13 not going to talk about these in great detail. For
14 those of you who -- agencies who have done this
15 before, you're familiar with -- with the seven
16 criteria and -- and really, the -- the criteria is
17 really intended to get at connecting the -- the
18 objectives of the study to management goals and -- and
19 if it's a -- if it's a request from the public, then
20 connecting the goals and objectives to the -- any
21 public interest considerations, really to get at,
22 again, any -- if there are any gaps in the information
23 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

1 study -- the relicensing studies are connected
2 logically to the -- to the project. And then -- and
3 then providing the detailed methodology, cost
4 information, timeline that it would take to do the
5 study and it's really -- it is a pretty involved
6 process so -- but these are the -- the criteria that
7 FERC has and I will -- and I'll just pause right there
8 for questions. And if there aren't any, we'll move
9 onto Steve Layman and get into the -- really get into
10 what the natural resource areas of the project.

11 MR. LAYMAN: Okay, great. Thanks,
12 Craig. Okay.

13 Yeah, good afternoon. I'm Steve
14 Layman. I'm an Aquatic Biologist and Project Manager
15 for Kleinschmidt. We're helping Ogelthorpe Power with
16 the environmental studies and environmental
17 documentation for the license application. And in
18 this segment, Kelly Kirven and I are going to cover at
19 a high level five of the key resource areas that are
20 covered in the PAD, as well as the proposed study
21 plans for addressing information needs for each of
22 those areas that are proposed by Ogelthorpe Power.

23 So first, I'll cover water resources,
24 fish and aquatic resources, and wildlife, botanical,
25 and wetland resources. And then Kelly will cover

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

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

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

1 you can see the Coosa River begins in Northwest
2 Georgia, flows down through Central Alabama and joins
3 the Tallapoosa River near Montgomery, and that forms
4 the Alabama River which flows down toward Mobile. The
5 Coosa River comprises about 45 percent of the ACT
6 River Basin.

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

17 The Rocky Mountain Project encompasses
18 5,000 acres of land and water. The project boundary
19 extends downstream about three-tenths of a mile on
20 Heath Creek and you can see the red dot on the upper
21 right portion at the downstream end of the project
22 boundary and that's the USGS Stream Gauge which
23 monitors discharge from the project. It's used to
24 monitor discharge from the project.

25 The Lower Reservoir and the Auxiliary

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

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

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

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

1 east-northeast towards Little Armuchee Creek for about
2 5 miles and then you can see Rock Mountain Creek in
3 the center. It originates along the base of Rock
4 Mountain and it flows east towards Lavender Creek.

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

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

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

1 EPD conducted a total maximum daily load evaluation or
2 a TMDL evaluation for Heath Creek and they identified
3 the primary sources of fecal coliform being wildlife,
4 agricultural livestock, and urban development such as
5 leaking septic systems at residential properties.
6 None of these sources of fecal coliform are related to
7 project operations, however.

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

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

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

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

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

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

1 quality with the exception of fecal coliform.

2 As Rick mentioned, Article 34 of the
3 license requires the project to release a continuous
4 minimum flow of 1.2 cubic feet per second to Heath
5 Creek. Also part of that license article, Ogelthorpe
6 Power conducted a field study of the minimum flow in
7 1996, so they examined the effects of four different
8 release scenarios ranging from 0.6 cfs to 8.3 cfs and
9 part of that study is summarized in the PAD and they
10 measured physical habitat with those various flows,
11 they sampled the fishery, they continuously monitored
12 dissolved oxygen and water temperature, and they
13 compared those data with Lavender Creek which was used
14 as a reference site. The study found that the 1.2 cfs
15 release maintained DO levels, that's dissolved oxygen,
16 about 5.5 milligrams per liter, and they were similar
17 to the levels measured in Lavender Creek. The minimum
18 instantaneous requirements for dissolved oxygen in
19 Heath Creek is 4 milligrams per liter, for comparison,
20 and a daily average of 5. So the study concluded that
21 1.2 cfs provides sufficient flow to preserve water
22 quality and maintain the resident fishery in -- in
23 Heath Creek.

24 Ogelthorpe Power has a robust water
25 quality data set with monitoring they've done and

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

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

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

1 Reservoir, so they remain well mixed so that Station
2 16, RM16 on the Lower Reservoir is reasonably
3 representative of the Upper Reservoir as well. Rock
4 Mountain Creek is not proposed for sampling either,
5 because there's no outlet from the Upper Reservoir to
6 that creek and the previous sampling indicated that
7 the water quality is unaffected by project operation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7 Seventeen federally and/or state listed
8 aquatic species have the potential to occur in the
9 project vicinity. They are listed here.
10 They're -- they're five fish, I think about 11
11 freshwater mussels and snails, and one aquatic insect
12 that's under review for federal listing. None of
13 these are presently known to occur within the project
14 boundary, but there is a lack of available sampling
15 records for freshwater mussels and snails in Heath
16 Creek.

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

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

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

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

1 project boundary, around the vicinity of the USGS
2 Gauge. The -- the study methods would follow EPD's
3 fish community biomonitoring standard
4 operating -- operating procedures and we would apply
5 the Index of Biotic Integrity to evaluate fish
6 community health. Sampling would be conducted by
7 backpack electrofishing primarily.

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

25 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
3 comments. The fish community survey and the mussel
4 survey would be conducted this year between June and
5 September. Study report prepared by January of 2023,
6 and that would be filed with the Draft License
7 Application for stakeholder review by early 2024.

8 So I'll pause here again and open it up
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.
18 Steve, if you don't mind maybe I'll take that.

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

1 finalize those study plans, we will definitely make
2 those work with the agencies on -- on finalizing and
3 getting feedback on those methodologies and
4 then -- and then once we -- once we get that dialed
5 in, then we'll have a good sense of -- of
6 when -- exactly when they start and the timeframes.

7 I think these are probably pretty good,
8 but we'll -- we'll provide more information as
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. Any
15 others?

16 Okay. I'll move onto Wildlife,
17 Botanical, and Wetland Resources. As characterized in
18 the PAD, the terrestrial vegetation and wildlife of
19 the project are representative of the Ridge and Valley
20 province of Northwest Georgia. Now, the predominant
21 forest types include pine-oak forests in the areas
22 surrounding Auxiliary Pools, chestnut oak forests with
23 pines on the slopes around Rock Mountain, and
24 oak-hickory forests on the southwest side of Rock
25 Mountain. Notable occurrences of wildlife species

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

5 Georgia DNR conducted a vegetative
6 survey of the wooded uplands of the project in Summer
7 2012 as part of the Terrestrial Management Plan for
8 the project. This figure on the left shows the
9 numerous vegetative survey points that they used
10 throughout the project area and the figure on the
11 right shows their mapping of the three dominant upland
12 vegetative community types. The green corresponds to
13 the pine-oak forest, the orange circle corresponds to
14 the chestnut oak forest that encircles Rock Mountain
15 on the slopes, and in the red corresponds to the
16 oak-hickory forest on the southwest side of -- of Rock
17 Mountain. So there's a substantial amount of existing
18 information about the dominant vegetative community
19 types.

20 All right. Let's advance. There we
21 go. Wetlands within the project boundary include
22 freshwater forested/shrub wetlands totaling at least
23 6.75 acres. In the PAD, we -- we reference national
24 wetland inventory information which tends to be dated
25 so there -- there may in fact be more wetland acreage

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

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

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

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

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

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

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

7 Another key element would be to prepare
8 a map of the project boundary delineating the
9 principal vegetative community types including
10 wetlands and getting a better update on how many
11 wetlands and their locations and types in the project
12 boundary. And that would be based on beginning with
13 DNR's vegetation surveys, other sources, and
14 ground-truthing of aerial photography. And the
15 proposed schedule for the terrestrial and wetland
16 resources survey would be conducting the field surveys
17 primarily in April through September of 2022. April
18 2023 if needed if we couldn't get started soon enough
19 to catch some of those early -- earlier blooming
20 plants. Preparing a study report by June 2023, and
21 then filing that report with the DLA in early 2024.

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

25 MR. JONES: And looks like

1 you're -- you're good to go. There's nothing in the
2 chat right now.

3 MR. LAYMAN: All right. Thanks, and
4 I'll hand it over now to Kelly Kirven who -- she will
5 cover the next two resource areas.

6 Take it away, Kelly.

7 MS. KIRVEN: Thanks, Steve. Okay.
8 Make sure I've got control here, all right.

9 Hi guys, good afternoon. As Steve
10 mentioned, I'm Kelly Kirven with Kleinschmidt. I'm
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,
15 there are approximately 5,000 acres of land and water
16 that are within the Rocky Mountain project boundary of
17 which 3700 of those acres are available for the public
18 for recreational activities. Mostly within the Rocky
19 Mountain Public Fishing Area or PFA. The Rocky
20 Mountain PFA includes two main recreation areas at the
21 Auxiliary Pool 1 as we mentioned, Antioch Lake, and
22 one main recreation area at Auxiliary Pool 2 or Heath
23 Lake.

24 There is no recreation activities
25 available at the Upper and Lower Reservoirs and the

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

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

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

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

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

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

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

1 again, a trailhead with parking and -- and trails.
2 And then we have a figure here that kind of shows
3 where some of the hiking and biking trails are located
4 at the project.

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

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

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

8 And key elements will include a review
9 and analysis of existing information. We do have the
10 2015 Form 80 information, although the Form 80 has
11 been discontinued by FERC. We do have the -- the data
12 from 2015 and will likely incorporate that, along with
13 a more up-to-date recent data collected by Georgia
14 DNR. We also plan to have small user group interview
15 to target various -- various groups, hunters and
16 fishermen, to get feedback from -- from them. And
17 we'll also make sure that, you know, recreation at the
18 project will analyze its consistency with the
19 Rome-Floyd County Comprehensive Plan.

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

1 prepare a study report during the summer of 2023 that
2 will be filed with the DLA around the February 2024
3 timeframe.

4 So if there are any questions with
5 recreation, I see there was a comment there on the
6 archery range at Heath Lake also. Yes, absolutely. I
7 did forget to mention that one. Thank you.

8 MR. HAKALA: Kelly, this is Jim Hakala
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
18 will that entail?

19 MS. KIRVEN: Sure. So that will
20 include an inventory, so we'll identify all of the
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
11 11 something that will --probably does need to be
12 12 included and I will mention that, you know, we do plan
13 13 to work pretty closely with you guys, with DNR, to
14 14 make sure that we cover all aspects since, you know,
15 15 DNR's managing the facilities, you guys are so close
16 16 to everything. We will make sure and cover all
17 17 of -- all of those items and if there's anything that
18 18 DNR knows of that needs, you know, extra attention, we
19 19 can make sure and include that.

20 20 MR. HAKALA: Okay. Great, great.

21 21 MR. HAYES: Hey, Jim it's -- Jim, it's
22 22 Rick Hayes, here.

23 23 MR. HAKALA: Yeah, Rick.

24 24 MR. HAYES: Just to let you know that
25 25 we do have some capital projects we're working on,

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

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

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

20 MS. KIRVEN: Yes.

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

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1 MS. KIRVEN: Okay.

2 MR. HAKALA: -- some fishing groups
3 that have -- have tournaments out there. If -- if
4 those type of things are limited, are -- are you going
5 to try to basically survey everybody that's coming in
6 there to get a representative sample of the -- of the
7 folks that are -- that are visiting out there?

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
14 can easily get to or that just don't, you know, don't
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,
18 it's -- it's not what we've proposed, but it is
19 something to consider for sure.

20 MR. HAKALA: Okay. I think -- I think
21 it would be good to, you know, to -- to get a, you
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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1 suit to the -- the data we collected in 2006 and 2007.

2 MS. KIRVEN: Okay.

3 MR. HAKALA: Which -- which I
4 believe -- believe you had. I think it's -- I think
5 it's -- it's important to find out, I mean, 2006 or
6 2007's quite a -- quite a long time ago and -- and,
7 you know, there's a possibility that the user base has
8 shifted, you know, what are they coming to the
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
14 experience possible, so I, you know, that's something
15 that -- that we would definitely be interested in.

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
20 that stuff from the 2006 survey as well. If there's
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
25 have some things that we'd like to discuss and --

1 MS. KIRVEN: Absolutely.

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

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

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

1 methodology correctly and -- and tweaking that as
2 we -- as we need to, so that's something that -- that
3 we will -- that is forthcoming.

4 MR. SIBLEY: Okay. Yeah, well feel
5 free to reach out to us directly. We'll -- we'll
6 definitely be available for that conversation.

7 MR. JONES: Great, thank you.

8 MS. KIRVEN: Yes, thank you.

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
18 studies that were completed at the project and in
19 1997, Garrow and Associates summarized these studies
20 into one document, which is titled Cultural Resource
21 Studies at the Rocky Mountain Project, Floyd County,
22 Georgia, A Technical Synthesis, and that's 1972 to
23 1997.

24 The synthesis lists numerous
25 prehistoric archaeological resources, historic

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

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

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

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

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

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

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

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

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

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

6 And so a general schedule, similar to
7 the others, you know, first step will be to identify
8 the APE and that will be in the May to June timeframe.
9 And then finalize a study plan in -- in June or
10 thereabouts. Conduct the -- the literature review
11 will happen this summer of 2022 and then the field
12 survey and the archaeological survey will happen in
13 the fall of 2022. And then move on to preparing the
14 study report through the end of this year into early
15 2023 and then the study report will be filed with the
16 draft license application for stakeholder review in
17 the February 2024 timeframe.

18 So any questions on cultural?

19 MR. HAYES: Hey Kelly, it's pronounced
20 "Fushay."

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

1 MR. HAYES: Well, you gave it a good
2 try. Fouche.

3 MS. KIRVEN: Thanks.

4 MR. JONES: All right. Thanks, Kelly.
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
14 exchange that we had on the -- the recreation studies,
15 but as I mentioned earlier, there is a 60-day comment
16 period after this meeting and that takes us out to May
17 15. Once we have those comments on the -- on the
18 proposed studies and if there are any -- you recommend
19 any additional recommended studies then -- then we'll
20 consider them and then we're going to respond to those
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
25 our -- and Jim our -- our little discussion just a

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

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

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

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

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

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

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

5 MR. JONES: Great.

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

22 MR. JONES: Thank you, Ben.

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

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

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

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

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
4 let me know if -- if that's something that you would
5 like to have. Shoot me an e-mail afterwards. That's
6 great.

7 Okay. Great. Thank you, Deidra. All
8 right, I think that's it so we will conclude and thank
9 you, again.

10 (Whereupon, the meeting concluded at
11 3:51 p.m.)

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CERTIFICATE OF DEPOSITION OFFICER

I, DEIDRA MUSICK NASH, the officer before 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 otherwise interested in the outcome of this action.



DEIDRA MUSICK NASH

Notary Public in and for the
State of Georgia

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I, STEPHANIE OSTRANDER, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings 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 otherwise interested in the outcome of this action.



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From: [Jones, Craig](#)
To: [McCaslin, Tyler](#)
Subject: FW: Relicensing
Date: Friday, March 18, 2022 2:41:57 PM
Attachments: [image003.png](#)

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: [Jones, Craig](#)
To: [Sibley, Jackson](#); [Hakala, Jim](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#); [Kelly Kirven](#)
Subject: RE: Follow Up on Proposed Studies
Date: Wednesday, March 30, 2022 9:51:39 AM
Attachments: [image001.png](#)

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,

cj

From: Sibley, Jackson [<mailto:Jackson.Sibley@dnr.ga.gov>]
Sent: Wednesday, March 30, 2022 9:06 AM
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 Proposed Studies

External E-Mail

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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

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From: Jones, Craig <craig.jones@opc.com>

Sent: Wednesday, March 30, 2022 8:26 AM

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

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

Subject: Follow Up on Proposed Studies

Good Morning Jim and Jackson,

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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: [image001.png](#)

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 PM
To: 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
Office #: 706-613-9493

Direct Line: 706-208-7519
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



From: [Jones, Craig](#)
To: [Kelly Kinsey](#); [Steven Layman](#); [McCaslin, Tyler](#)
Subject: Fwd: Follow Up on Proposed Studies
Date: Wednesday, April 13, 2022 8:16:27 AM
Attachments: [image001.png](#)

Sent from my iPad. Please pardon the typos.

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@opc.com>; "Hakala, Jim" <Jim.Hakala@dnr.ga.gov>
Cc: "McCaslin, Tyler" <tyler.mccaslin@opc.com>
Subject: RE: Follow Up on Proposed Studies

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(706) 844-3676

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Facebook <https://urldefense.com/v3/!NiuZ6VYi5HVyER71QegSA7KMR7dRYdmDObGKURuSLhQ5biNeyepSiBXN4etR28vMgdxH3I78s3Q2bHkGEJefomjk6K_x3eUfS>
• Twitter <<https://urldefense.com/v3/!NiuZ6VYi5HVyER71QegSA7KMR7dRYdmDObGKURuSLhQ5biNeyepSiBXN4etR28vMgdxH3I78s3Q2bHkGEJefomjk6K4D2DaPaS>>
Instagram <https://urldefense.com/v3/!NiuZ6VYi5HVyER71QegSA7KMR7dRYdmDObGKURuSLhQ5biNeyepSiBXN4etR28vMgdxH3I78s3Q2bHkGEJefomjk6KzMdV_COS>
Buy a hunting or fishing license today! <<https://urldefense.com/v3/!NiuZ6VYi5HVyER71QegSA7KMR7dRYdmDObGKURuSLhQ5biNeyepSiBXN4etR28vMgdxH3I78s3Q2bHkGEJefomjk6Kz3qLbsdS>>

From: Jones, Craig <craig.jones@opc.com>
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Craig

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To: 'Jim Hakala' <Jim.Hakala@dnr.ga.gov>; Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>; mailto:Jackson.Sibley@dnr.ga.gov>>
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Email: craig.jones@opc.com <<mailto:craig.jones@opc.com>> Web: www.opc.com <https://urldefense.com/v3/!HWVSVPY!zyPIFqE3ySV5y02ymwblVu5KETZfhO6iAtzGSvlySsqjix_Imzi6RbYcfIA6-xByJuTdS>

[cid:image001.png@01D84411.B5C9BE60] <https://urldefense.com/v3/!HWVSVPY!zyPIFqE3ySV5y02ymwblVu5KETZfhO6iAtzGSvlySsqjix_Imzi6RbYcfIA6-xByJuTdS>

From: [Sibley, Jackson](#)
To: [Jones, Craig](#); [Hakala, Jim](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#); [Kelly Kirven](#)
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](#)

Craig,

I apologize for another delayed response. In short, we feel that the Recreational Use Analysis (RUA) as described during the JAM meeting may limit the ability to draw meaningful management takeaways from the study. Given the “recreational use” designation applied to Rocky’s auxiliary pools, we believe a more intensive RUA approach is warranted. The GADNR conducted a similar use analysis at Rocky in 2006-2007, that covered a one year period. We ask that its format be considered in the development of the proposed RUA. Please find the attached materials, which highlight both the study design and analysis procedures as well as the interview scheduling format.

Please also note these methodological advantages of mirroring the 2006 study:

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I look forward to discussing these possibilities in person,

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Wildlife Resources Division

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

Email: craig.jones@opc.com **Web:** www.opc.com



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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: [image001.png](#)

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

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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 <Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
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Office: 770-270-7348 **Mobile:** 770-500-8912
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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.

ORIGINAL

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



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

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

The State Senate
Atlanta, Georgia 30334

April 15, 2022

P-2725

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

FILED
SECRETARY OF THE
COMMISSION
2022 APR 25 P 2:38
FEDERAL ENERGY
REGULATORY COMMISSION

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.

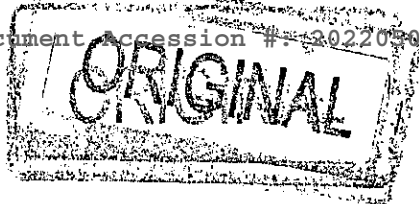
I also want to take this opportunity to express my general support for OPC relicensing Plant Rocky. OPC and Plant Rocky are a part of the critical infrastructure of Georgia's electric grid, and a reliable contributor to the Floyd County tax base. Plant Rocky offers Northwest Georgia citizens and visitors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



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

FILED
SECRETARY OF THE
COMMISSION

P-2725

2022 MAY -9 P 3: 06

Dear Ms. Bose:

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.

I would also like to take this opportunity to express my general support for Oglethorpe Power Corporation's relicensing Plant Rocky. Oglethorpe Power Corporation 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 several members of the community.

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 M. Dempsey

Katie Dempsey
State Representative

Document Content(s)

DocBatch220509-0043.tif.....1

From: [Jones, Craig](#)
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: [image001.png](#)

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

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—5:00 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





GEORGIA
DEPARTMENT OF NATURAL RESOURCES

WILDLIFE RESOURCES DIVISION

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:

1. 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 GADNR's 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.
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.

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.



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: [Jones, Craig](#); [Hakala, Jim](#)
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: [image001.png](#)

External E-Mail

Craig,

Sounds great. See you this afternoon.

Best,

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, 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,

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

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

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[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,

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First options for us are...

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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: [Jones, Craig](#)
To: [Hakala, Jim](#); [Sibley, Jackson](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#); [Kelly Kirven](#)
Subject: Working Draft of Potential Recreation Survey
Date: Friday, May 13, 2022 3:56:06 PM
Attachments: [image003.png](#)
[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: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:	
Interviewer:					
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> RV/Camper					
1. What is your county and state of residence?		County:		State:	
2. What is your zip code? _____					
3. How many people (including you) are in your group today? _____ people					
4. What is your age?		<input type="checkbox"/> 18-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54 <input type="checkbox"/> 55+
5. If you came with others, what are their age groups? (check all that apply)					
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)		
6. How did you hear about the area?					
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other			
7. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____					
8. What is the primary reason for your visit today? (check all that apply)					
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking		
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing		
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation		
<input type="checkbox"/> Other:					
9. If you came to fish today, how would you rate your fishing experience?					
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
10. If you came to fish today, where did you fish?					
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake			
11. If you came to hunt today, how would you rate your hunting experience?					
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. Please rate the quality of the existing facilities at this access area. (choose one for each)					
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> 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:		State:		
2. What is your zip code? _____						
2. How many people (including you) are in your group today? _____ people						
3. What is your age?		<input type="checkbox"/> 18-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55+
4. If you came with others, what are their age groups? (check all that apply)						
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)			
5. How would you rate the online booking experience for camping reservations?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
6. What activities are you participating in while camping? (check all that apply)						
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking			
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife Viewing			
<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation	<input type="checkbox"/> Other (list below):			
7. While camping at Rocky Mountain PFA, are you staying in:						
<input type="checkbox"/> Tent	<input type="checkbox"/> RV	<input type="checkbox"/> Tent/RV Combo	<input type="checkbox"/> Group Camp			
8. Please rate the quality of the existing camping facilities. (choose one description for each)						
Campsite:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Playground:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> 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



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RULES
STATE PROPERTIES

May 4, 2022

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

P-2725

FILED
SECRETARY OF THE
COMMISSION
2022 MAY 19 P 1:47
FEDERAL ENERGY
REGULATORY COMMISSION

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,

Eddie Lumsden

Eddie Lumsden
State Representative

Document Content(s)

DocBatch220519-0024.tif.....1

From: [Kelly Kirven](#)
To: [Sibley, Jackson](#); [Jones, Craig](#); [Hakala, Jim](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: RE: Working Draft of Potential Recreation Survey
Date: Thursday, May 26, 2022 1:41:24 PM
Attachments: [image003.png](#)

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 <craig.jones@opc.com>

Sent: Friday, May 13, 2022 3:56 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 <Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>

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: [Jones, Craig](#)
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: [image001.png](#)

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,

cj

Craig A. Jones, PhD

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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: [image001.png](#)
[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,

cj

Craig A. Jones, PhD

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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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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 <Steven.Layman@Kleinschmidtgroup.com>; Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>; Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>
Subject: RE: Meeting to Discuss Study Methods

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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 <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,

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. in-person 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

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

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,

cj

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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: [image002.png](#)
[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

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

Office: 770-270-7348 **Mobile:** 770-500-8912
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Draft Study Plans

Rocky Mountain Pumped Storage Hydroelectric Project

June 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

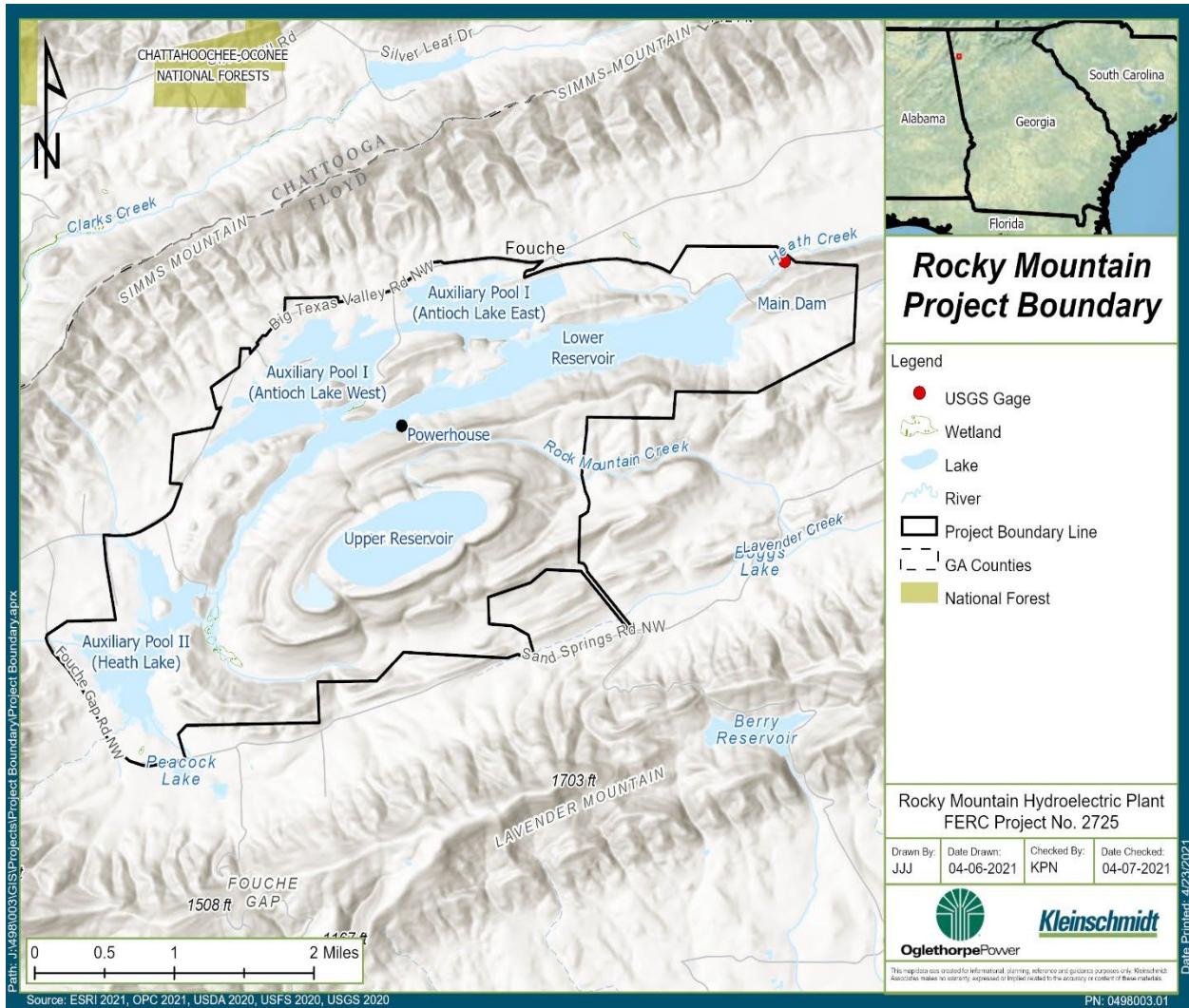


Figure 1 Project Boundary Map

2.0 WATER QUALITY 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.

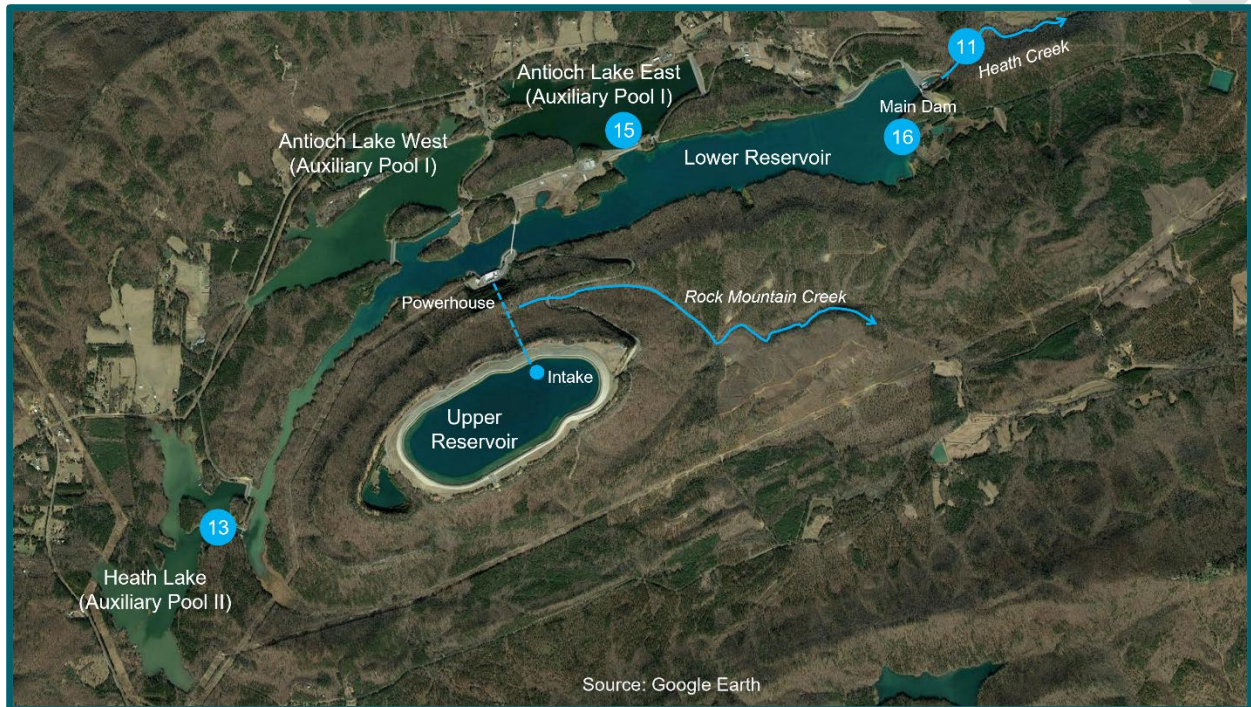
2.3 Methodology

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

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 (nitrate-nitrite), 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).

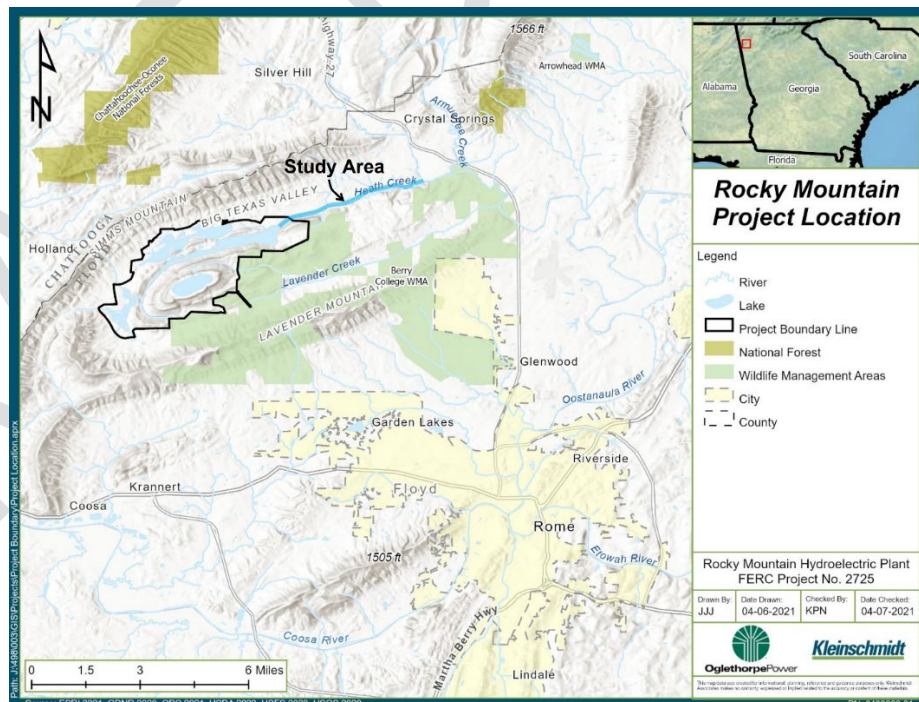


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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:			
<i>Elliptio arca</i>	Alabama spike		E
<i>Hamiota altilis</i>	Finelined pocketbook	LT	T
<i>Medionidus acutissimus</i>	Alabama moccasinshell	LT	E
<i>Medionidus parvulus</i>	Coosa moccasinshell	LE	E
<i>Pleurobema decisum</i>	Southern clubshell	LE	E
<i>Pleurobema georgianum</i>	Southern pigtoe	LE	E
<i>Ptychobranthus foremanianus</i>	Rayed kidneyshell	LE	E
<i>Ptychobranthus greenii</i>	Triangular kidneyshell	LE	
<i>Villosa umbrans</i>	Coosa creekshell	UR	R
Snails:			
<i>Leptoxis foremani</i>	Interrupted rocksnail	LE	E
<i>Pleurocera showalteri</i>	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

^b Georgia state status: E = endangered; T = threatened; R = rare.

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.

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.

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 vegetive 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

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; 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 2023¹. The purpose of these on-site 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 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.

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.

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: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:		
Interviewer:						
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> 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?		<input type="checkbox"/> 16-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55+
4. If you came with others, what are their age groups? (check all that apply)						
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)			
5. How did you hear about the area?						
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other				
6. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____						
7. What is the primary reason for your visit today? (check all that apply)						
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking			
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing			
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation			
<input type="checkbox"/> Other:						
8. If you came to fish today, how would you rate your fishing experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
9. If you came to fish today, where did you fish? (check all that apply)						
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake				
10. If you came to hunt today, how would you rate your hunting experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
11. Please rate the quality of the existing facilities at this access area. (choose one for each)						
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. What type of visitation permit do you have? (check all that apply)						
<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> 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:		Time:			
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	___ 35-44	___ 45-54
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 would you rate the online booking experience for camping reservations?					
___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
6. What activities are you participating in while camping? (check all that apply)					
___ Boat Fishing	___ Picnicking	___ Hiking	___ Canoeing/kayaking		
___ Bank Fishing	___ Swimming	___ Biking	___ Wildlife Viewing		
___ Hunting	___ Pleasure Boating	___ Shoreline relaxation	___ Other (list below):		
7. While camping at Rocky Mountain PFA, are you staying in:					
___ Tent	___ RV	___ Tent/RV Combo	___ Group Camp		
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 quality of the existing camping facilities. (choose one description for each)					
Campsite:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Playground:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Restrooms:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Cleanliness:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Bank Fishing:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
11. What type of visitation permit do you have? (check all that apply)					
___ Daily	___ Annual	___ Campground	___ None		
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

DRAFT Document

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: [image001.png](#)

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: [Jones, Craig](#)
To: [Hakala, Jim](#); Paula.Marcinek@dnr.ga.gov
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: [image001.png](#)

Hi Jim and Paula,

I hope all is well. I'm following up on our last discussion on the timing and methods of the fish and terrestrial/wetland studies. Please let me know 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 PM
Attachments: [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

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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

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Best regards,

Santi Martinez

ER

Georgia Department of Community Affairs
er@dca.ga.gov



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Sent: Thursday, July 7, 2022 3:15 PM
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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

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Cc: Santiago D. Martinez <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>
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

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Craig,

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Thanks!

Jennifer Dixon

Division Director, Historic Preservation Division
Georgia Department of Community Affairs
60 Executive Park South, NE
Atlanta, Georgia 30329

Direct [4044866376](tel:4044866376)
Jennifer.Dixon@dca.ga.gov

Learn more about our commitment to [fair housing](#).

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 <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Jennifer Dixon <Jennifer.Dixon@dca.ga.gov>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>

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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: [image001.png](#)

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To: [Aspen Kemmerlin](#)
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: [image001.png](#)
[0498003 Rocky Mountain Proposed Study Plans 07-07-2022 HPD.pdf](#)

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Draft Study Plans

Rocky Mountain Pumped Storage Hydroelectric Project

July 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

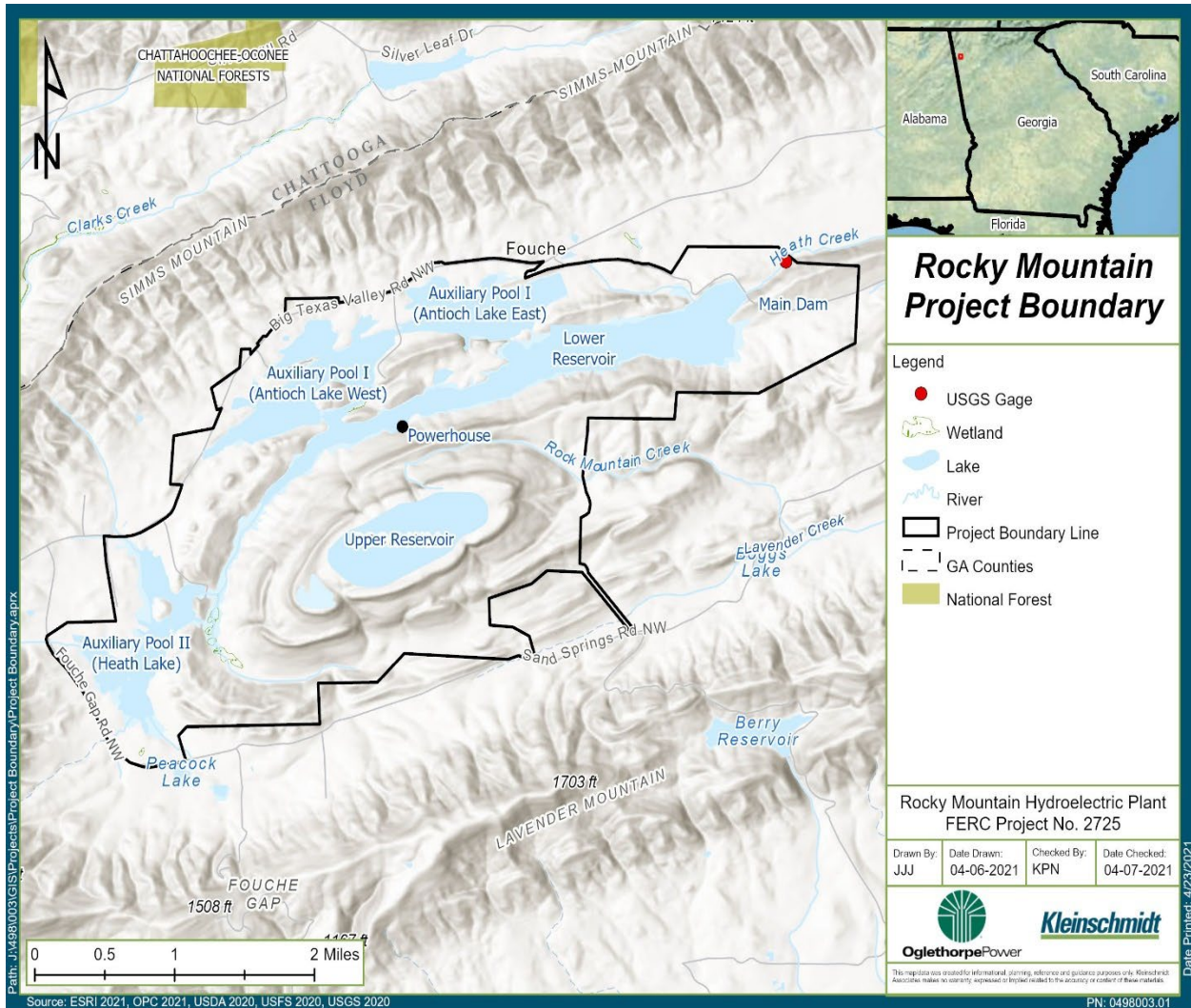


Figure 1 Project Boundary Map

DRAFT

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.

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. 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: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: Rocky Mountain Relicensing Proposed Studies
Date: Thursday, July 7, 2022 6:45:54 PM
Attachments: [image003.png](#)

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

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2100 East Exchange Place, Tucker, GA 30084

Office: 770-270-7348 **Mobile:** 770-500-8912
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From: [Jones, Craig](#)
To: [ER](#)
Cc: [Steven Layman](#); [McCaslin, Tyler](#); [Ayesha Tarek](#)
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 typos.

On Jul 8, 2022, at 8:57 AM, ER <er@dca.ga.gov> 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



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<[image002.png](#)>

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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 <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Jennifer Dixon <Jennifer.Dixon@dca.ga.gov>; 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](#)>

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: [image002.png](#)

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

Wildlife Resources Division

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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: [Marcinek, Paula](#)
To: [Jones, Craig](#); [Hakala, Jim](#)
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' <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

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 <craig.jones@opc.com>; 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

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.Marcinek@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: 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: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: RE: Rocky Mountain Relicensing Proposed Studies
Date: Tuesday, July 12, 2022 5:32:30 PM
Attachments: [image001.png](#)

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: [image001.png](#)

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 Heath 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: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: RE: [EXTERNAL] RE: Rocky Mountain Relicensing Proposed Studies
Date: Wednesday, July 13, 2022 11:39:49 AM
Attachments: [image003.png](#)
[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 <craig.jones@opc.com>
Sent: Tuesday, July 12, 2022 5:32 PM
To: Bauer, Eric F <eric_bauer@fws.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>
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,

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: [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: [image002.png](#)

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 be 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

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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 <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,

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 <craig.jones@opc.com>

Sent: Friday, July 8, 2022 2:05 PM

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

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 typos.

On Jul 8, 2022, at 8:57 AM, ER <er@dca.ga.gov> 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 <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

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 <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 <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' <Jennifer.Dixon@dca.ga.gov>; 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>
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 <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>
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!

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 <Santiago.Martinez@dca.ga.gov>; McCaslin, Tyler <tyler.mccaslin@opc.com>; Jennifer Dixon <Jennifer.Dixon@dca.ga.gov>; 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: [Jones, Craig](#)
To: [Zeng, Wei](#); [Wiedl, Stephen](#); [Booth, Elizabeth](#)
Cc: [Steven Layman](#); [McCaslin, Tyler](#)
Subject: RE: Rocky Mountain Relicensing Water Quality Study Update
Date: Thursday, July 14, 2022 12:45:17 PM
Attachments: [image001.png](#)
[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,

cj

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, cj

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 <Steven.Layman@Kleinschmidtgroup.com>; 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 <craig.jones@opc.com>; 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

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 <Steven.Layman@Kleinschmidtgroup.com>; 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 <craig.jones@opc.com>; Zeng, Wei <Wei.Zeng@dnr.ga.gov>; Booth, Elizabeth <Elizabeth.Booth@dnr.ga.gov>

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 <craig.jones@opc.com>

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 <Stephen.Wiedl@dnr.ga.gov>

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

Rocky Mountain Pumped Storage Hydroelectric Project

June 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

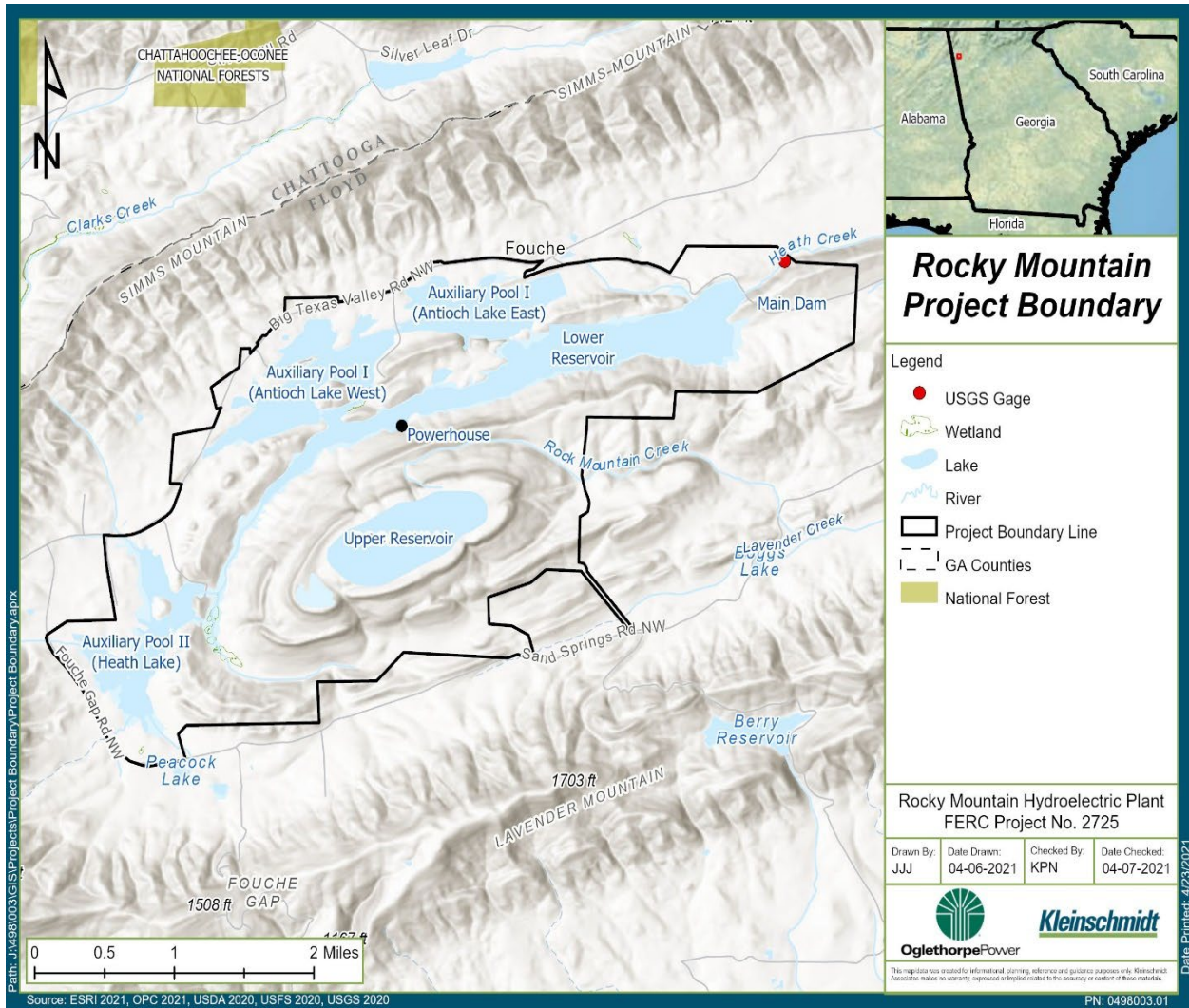


Figure 1 Project Boundary Map

2.0 WATER QUALITY 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.

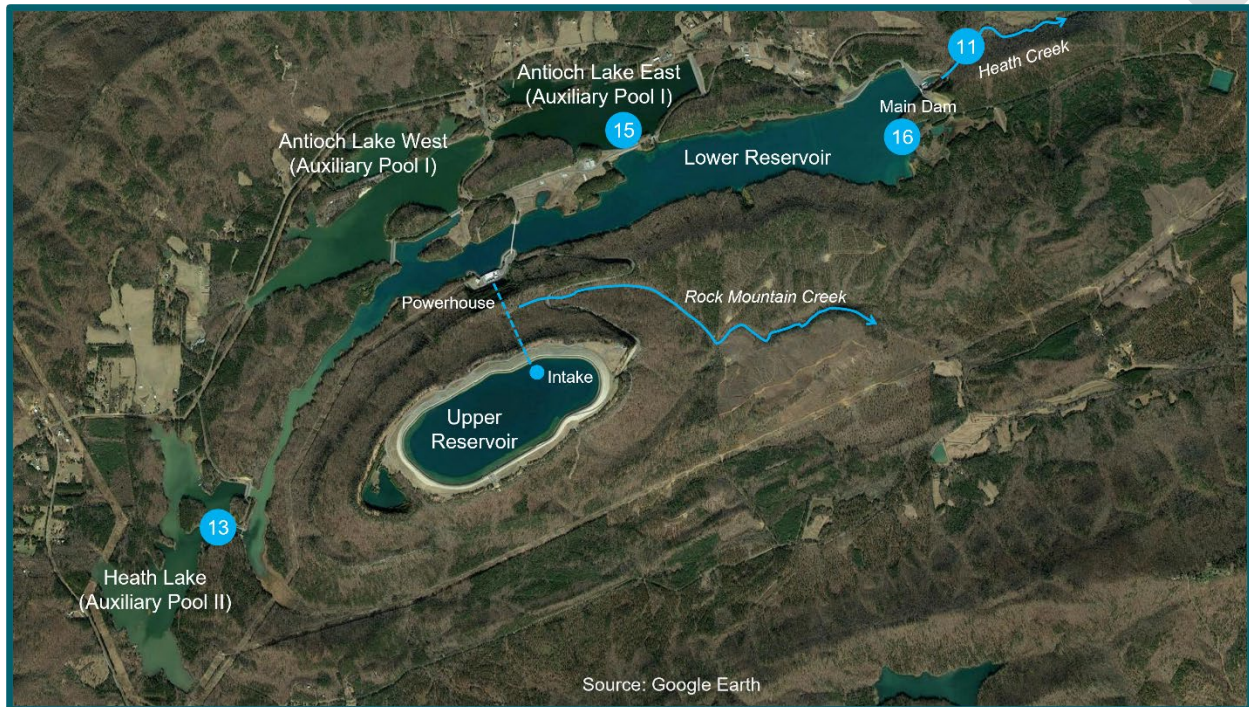
2.3 Methodology

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

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 (nitrate-nitrite), 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).

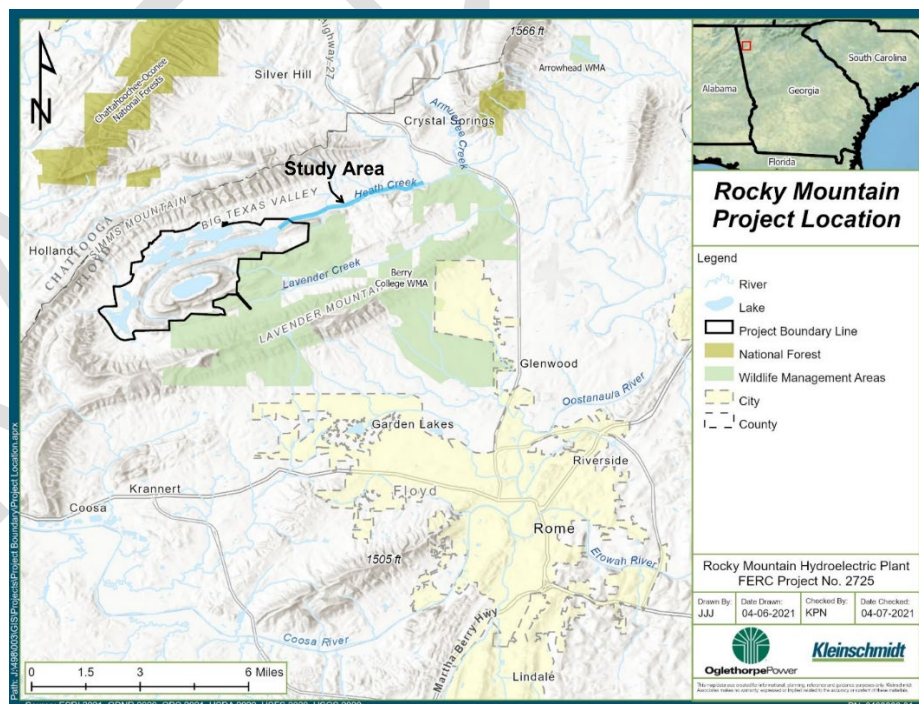


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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:			
<i>Elliptio arca</i>	Alabama spike		E
<i>Hamiota altilis</i>	Finelined pocketbook	LT	T
<i>Medionidus acutissimus</i>	Alabama moccasinshell	LT	E
<i>Medionidus parvulus</i>	Coosa moccasinshell	LE	E
<i>Pleurobema decisum</i>	Southern clubshell	LE	E
<i>Pleurobema georgianum</i>	Southern pigtoe	LE	E
<i>Ptychobranthus foremanianus</i>	Rayed kidneyshell	LE	E
<i>Ptychobranthus greenii</i>	Triangular kidneyshell	LE	
<i>Villosa umbrans</i>	Coosa creekshell	UR	R
Snails:			
<i>Leptoxis foremani</i>	Interrupted rocksnail	LE	E
<i>Pleurocera showalteri</i>	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

^b Georgia state status: E = endangered; T = threatened; R = rare.

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.

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.

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 vegetive 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

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; 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 2023¹. The purpose of these on-site 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 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.

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.

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: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:		
Interviewer:						
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> 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?		<input type="checkbox"/> 16-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55+
4. If you came with others, what are their age groups? (check all that apply)						
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)			
5. How did you hear about the area?						
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other				
6. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____						
7. What is the primary reason for your visit today? (check all that apply)						
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking			
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing			
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation			
<input type="checkbox"/> Other:						
8. If you came to fish today, how would you rate your fishing experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
9. If you came to fish today, where did you fish? (check all that apply)						
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake				
10. If you came to hunt today, how would you rate your hunting experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
11. Please rate the quality of the existing facilities at this access area. (choose one for each)						
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. What type of visitation permit do you have? (check all that apply)						
<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> 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:		Time:				
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	___ 35-44	___ 45-54	___ 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 would you rate the online booking experience for camping reservations?						
___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)		
6. What activities are you participating in while camping? (check all that apply)						
___ Boat Fishing	___ Picnicking	___ Hiking	___ Canoeing/kayaking			
___ Bank Fishing	___ Swimming	___ Biking	___ Wildlife Viewing			
___ Hunting	___ Pleasure Boating	___ Shoreline relaxation	___ Other (list below):			
7. While camping at Rocky Mountain PFA, are you staying in:						
___ Tent	___ RV	___ Tent/RV Combo	___ Group Camp			
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 quality of the existing camping facilities. (choose one description for each)						
Campsite:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Playground:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Restrooms:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Cleanliness:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Bank Fishing:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
11. What type of visitation permit do you have? (check all that apply)						
___ Daily	___ Annual	___ Campground	___ None			
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: [Steven Layman](#); [McCaslin, Tyler](#)
Subject: Draft Fish, Mussel, Terrestrial and Botanical Study Plans for RM Relicensing
Date: Wednesday, July 20, 2022 2:14:12 PM
Attachments: [image003.png](#)
[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

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Draft Study Plans

Rocky Mountain Pumped Storage Hydroelectric Project

June 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

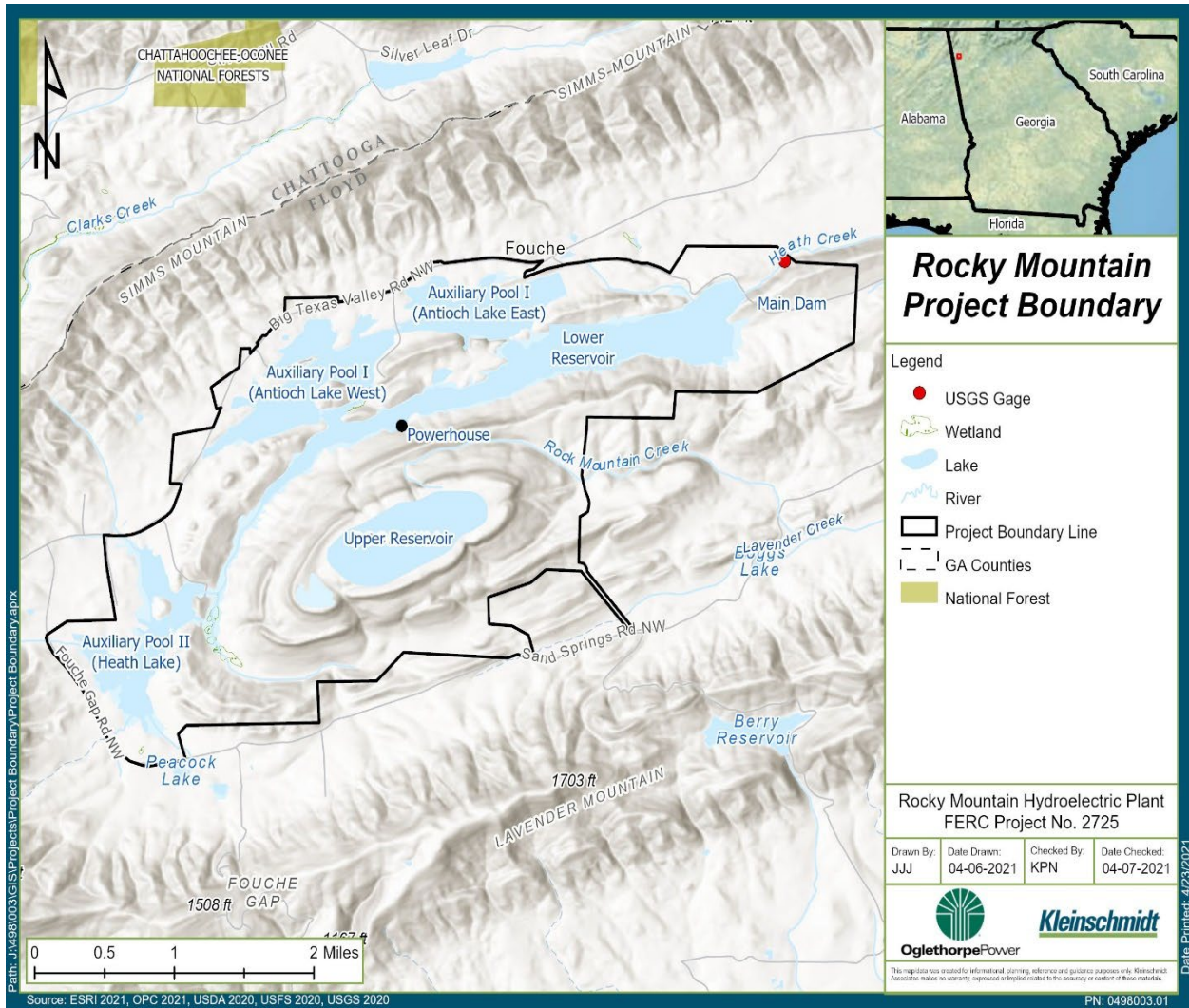


Figure 1 Project Boundary Map

2.0 WATER QUALITY 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.

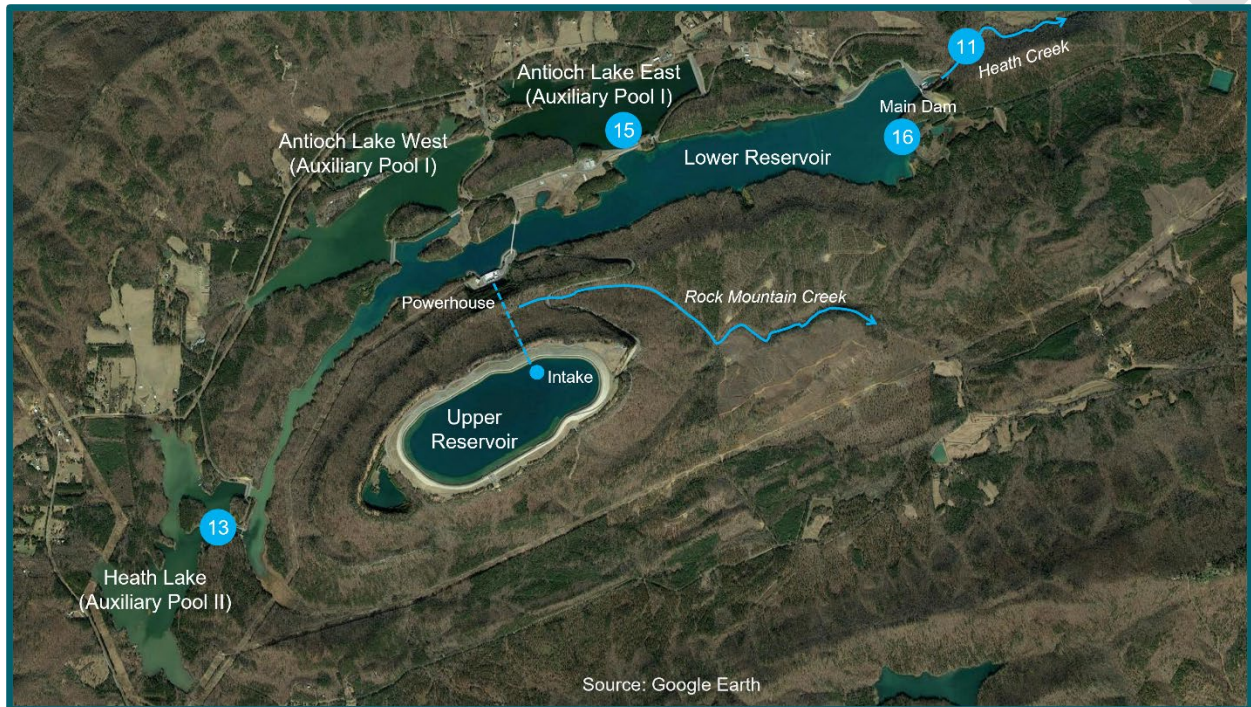
2.3 Methodology

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

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 (nitrate-nitrite), 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).

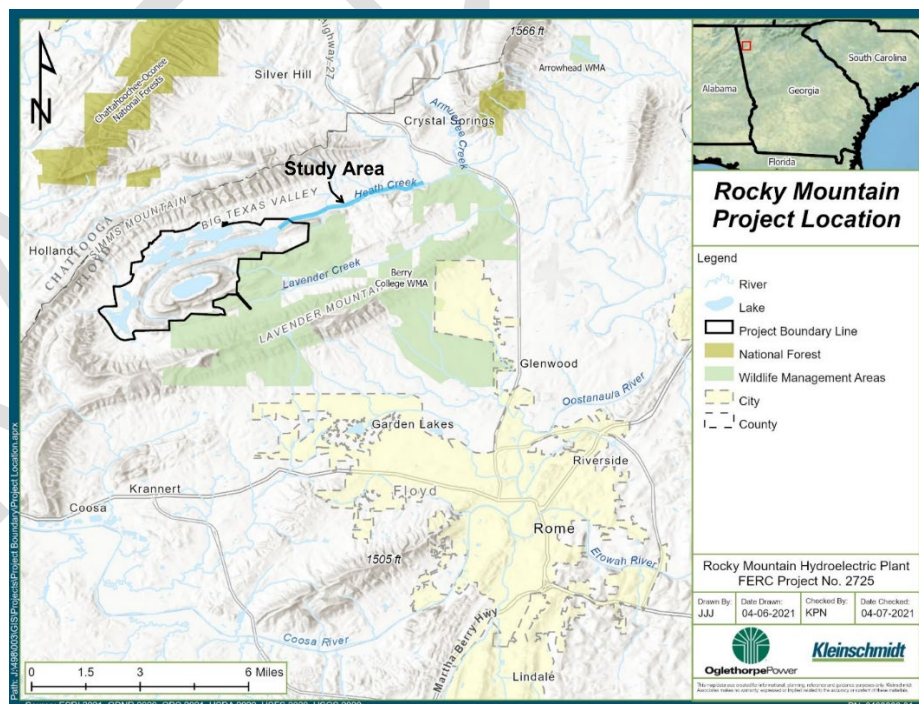


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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:			
<i>Elliptio arca</i>	Alabama spike		E
<i>Hamiota altilis</i>	Finelined pocketbook	LT	T
<i>Medionidus acutissimus</i>	Alabama moccasinshell	LT	E
<i>Medionidus parvulus</i>	Coosa moccasinshell	LE	E
<i>Pleurobema decisum</i>	Southern clubshell	LE	E
<i>Pleurobema georgianum</i>	Southern pigtoe	LE	E
<i>Ptychobranthus foremanianus</i>	Rayed kidneyshell	LE	E
<i>Ptychobranthus greenii</i>	Triangular kidneyshell	LE	
<i>Villosa umbrans</i>	Coosa creekshell	UR	R
Snails:			
<i>Leptoxis foremani</i>	Interrupted rocksnail	LE	E
<i>Pleurocera showalteri</i>	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

^b Georgia state status: E = endangered; T = threatened; R = rare.

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.

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.

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 vegetive 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

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; 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 2023¹. The purpose of these on-site 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 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.

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.

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: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:		
Interviewer:						
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> 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?		<input type="checkbox"/> 16-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55+
4. If you came with others, what are their age groups? (check all that apply)						
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)			
5. How did you hear about the area?						
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other				
6. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____						
7. What is the primary reason for your visit today? (check all that apply)						
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking			
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing			
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation			
<input type="checkbox"/> Other:						
8. If you came to fish today, how would you rate your fishing experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
9. If you came to fish today, where did you fish? (check all that apply)						
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake				
10. If you came to hunt today, how would you rate your hunting experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
11. Please rate the quality of the existing facilities at this access area. (choose one for each)						
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. What type of visitation permit do you have? (check all that apply)						
<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> 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:		Time:			
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	___ 35-44	___ 45-54
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 would you rate the online booking experience for camping reservations?					
___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
6. What activities are you participating in while camping? (check all that apply)					
___ Boat Fishing	___ Picnicking	___ Hiking	___ Canoeing/kayaking		
___ Bank Fishing	___ Swimming	___ Biking	___ Wildlife Viewing		
___ Hunting	___ Pleasure Boating	___ Shoreline relaxation	___ Other (list below):		
7. While camping at Rocky Mountain PFA, are you staying in:					
___ Tent	___ RV	___ Tent/RV Combo	___ Group Camp		
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 quality of the existing camping facilities. (choose one description for each)					
Campsite:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Playground:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Restrooms:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Cleanliness:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
Bank Fishing:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)
11. What type of visitation permit do you have? (check all that apply)					
___ Daily	___ Annual	___ Campground	___ None		
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

DRAFT Document

From: [Jones, Craig](#)
To: [Bauer, Eric F](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: Draft WQ Assessment for RM Relicensing
Date: Wednesday, July 20, 2022 2:11:25 PM
Attachments: [image003.png](#)
[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
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Draft Study Plans

Rocky Mountain Pumped Storage Hydroelectric Project

June 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

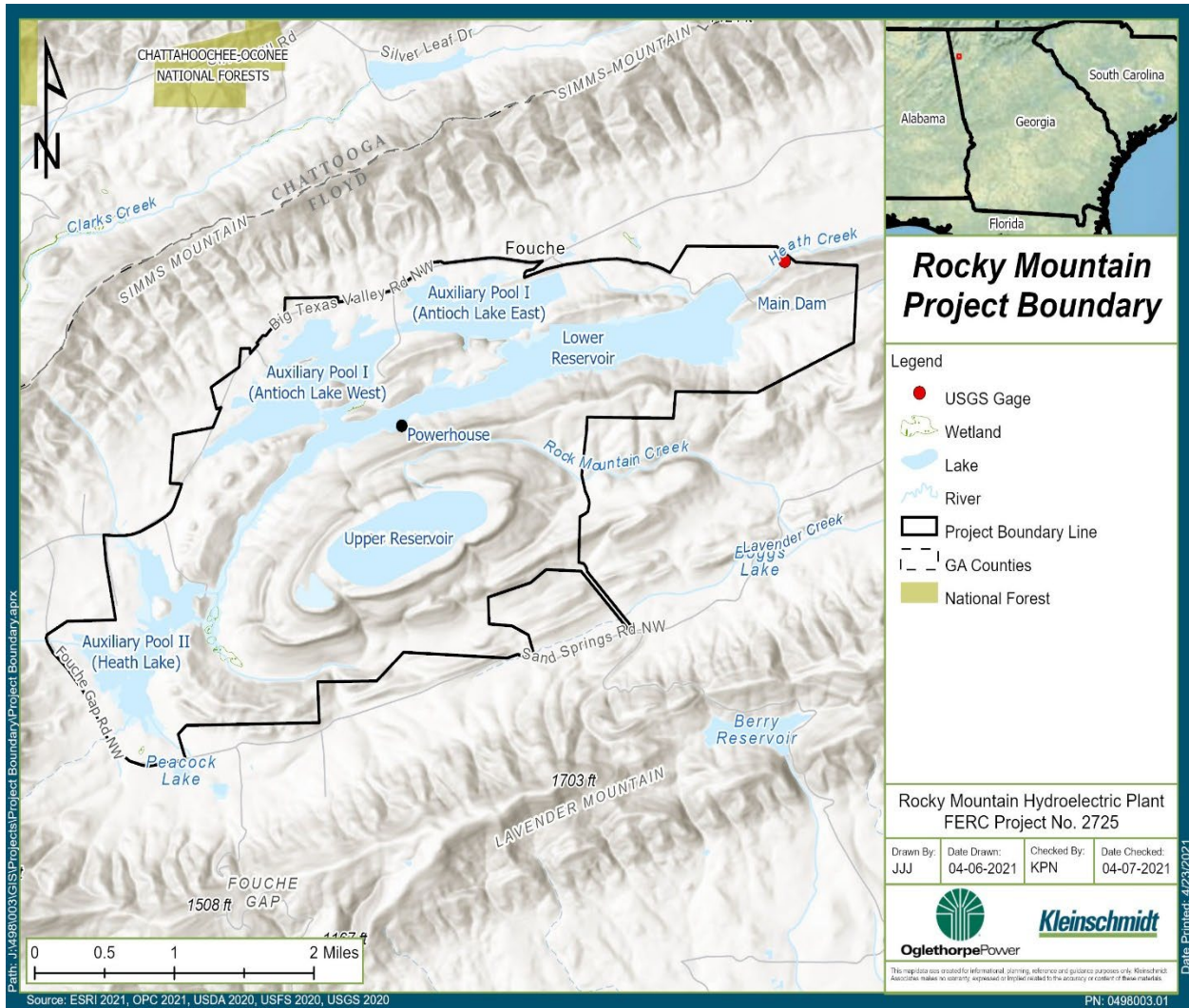


Figure 1 Project Boundary Map

2.0 WATER QUALITY 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.

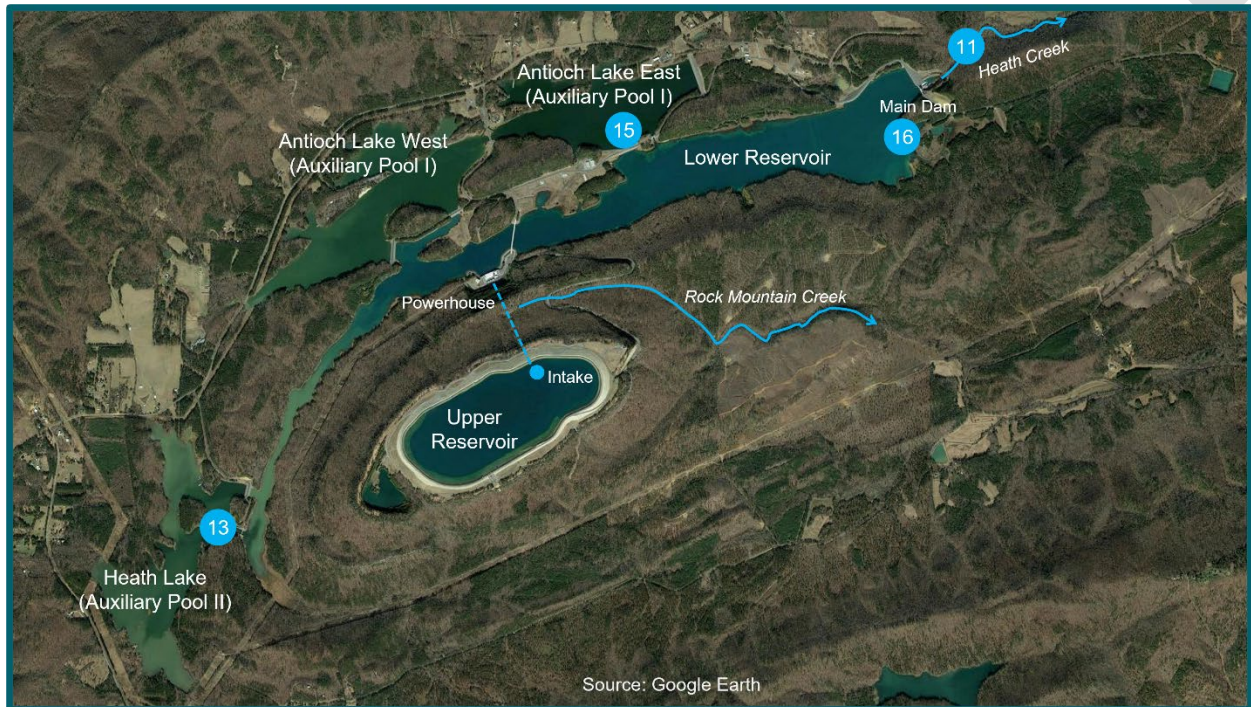
2.3 Methodology

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

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 (nitrate-nitrite), 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).

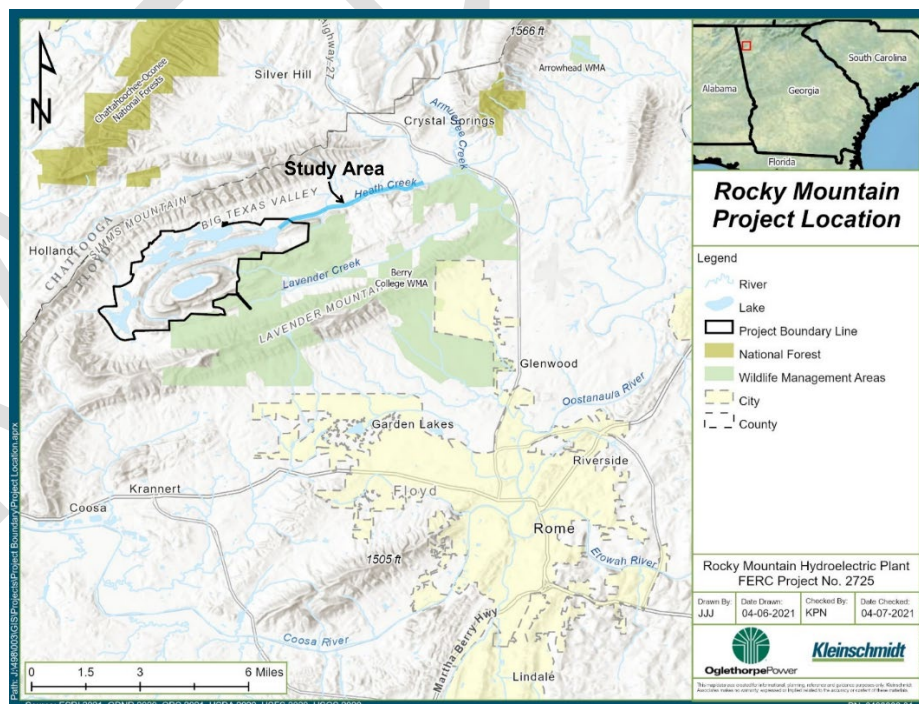


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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:			
<i>Elliptio arca</i>	Alabama spike		E
<i>Hamiota altilis</i>	Finelined pocketbook	LT	T
<i>Medionidus acutissimus</i>	Alabama moccasinshell	LT	E
<i>Medionidus parvulus</i>	Coosa moccasinshell	LE	E
<i>Pleurobema decisum</i>	Southern clubshell	LE	E
<i>Pleurobema georgianum</i>	Southern pigtoe	LE	E
<i>Ptychobranthus foremanianus</i>	Rayed kidneyshell	LE	E
<i>Ptychobranthus greenii</i>	Triangular kidneyshell	LE	
<i>Villosa umbrans</i>	Coosa creekshell	UR	R
Snails:			
<i>Leptoxis foremani</i>	Interrupted rocksnail	LE	E
<i>Pleurocera showalteri</i>	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

^b Georgia state status: E = endangered; T = threatened; R = rare.

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.

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.

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 vegetive 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

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; 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 2023¹. The purpose of these on-site 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 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.

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.

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.
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Location: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:		
Interviewer:						
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> 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?		<input type="checkbox"/> 16-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54	<input type="checkbox"/> 55+
4. If you came with others, what are their age groups? (check all that apply)						
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)			
5. How did you hear about the area?						
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other				
6. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____						
7. What is the primary reason for your visit today? (check all that apply)						
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking			
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing			
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation			
<input type="checkbox"/> Other:						
8. If you came to fish today, how would you rate your fishing experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
9. If you came to fish today, where did you fish? (check all that apply)						
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake				
10. If you came to hunt today, how would you rate your hunting experience?						
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)		
11. Please rate the quality of the existing facilities at this access area. (choose one for each)						
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. What type of visitation permit do you have? (check all that apply)						
<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> Daily	<input type="checkbox"/> 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.
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Date:		Time:				
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	___ 35-44	___ 45-54	___ 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 would you rate the online booking experience for camping reservations?						
___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)		
6. What activities are you participating in while camping? (check all that apply)						
___ Boat Fishing	___ Picnicking	___ Hiking	___ Canoeing/kayaking			
___ Bank Fishing	___ Swimming	___ Biking	___ Wildlife Viewing			
___ Hunting	___ Pleasure Boating	___ Shoreline relaxation	___ Other (list below):			
7. While camping at Rocky Mountain PFA, are you staying in:						
___ Tent	___ RV	___ Tent/RV Combo	___ Group Camp			
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 quality of the existing camping facilities. (choose one description for each)						
Campsite:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Playground:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Restrooms:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Cleanliness:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Bank Fishing:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
11. What type of visitation permit do you have? (check all that apply)						
___ Daily	___ Annual	___ Campground	___ None			
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,

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: [Jones, Craig](#)
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: [image001.png](#)
[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

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



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 <Steven.Layman@Kleinschmidtgroup.com>

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

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

Email: craig.jones@opc.com **Web:** www.opc.com



From: [Jones, Craig](#)
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: [image003.png](#)
[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

Rocky Mountain Pumped Storage Hydroelectric Project

July 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

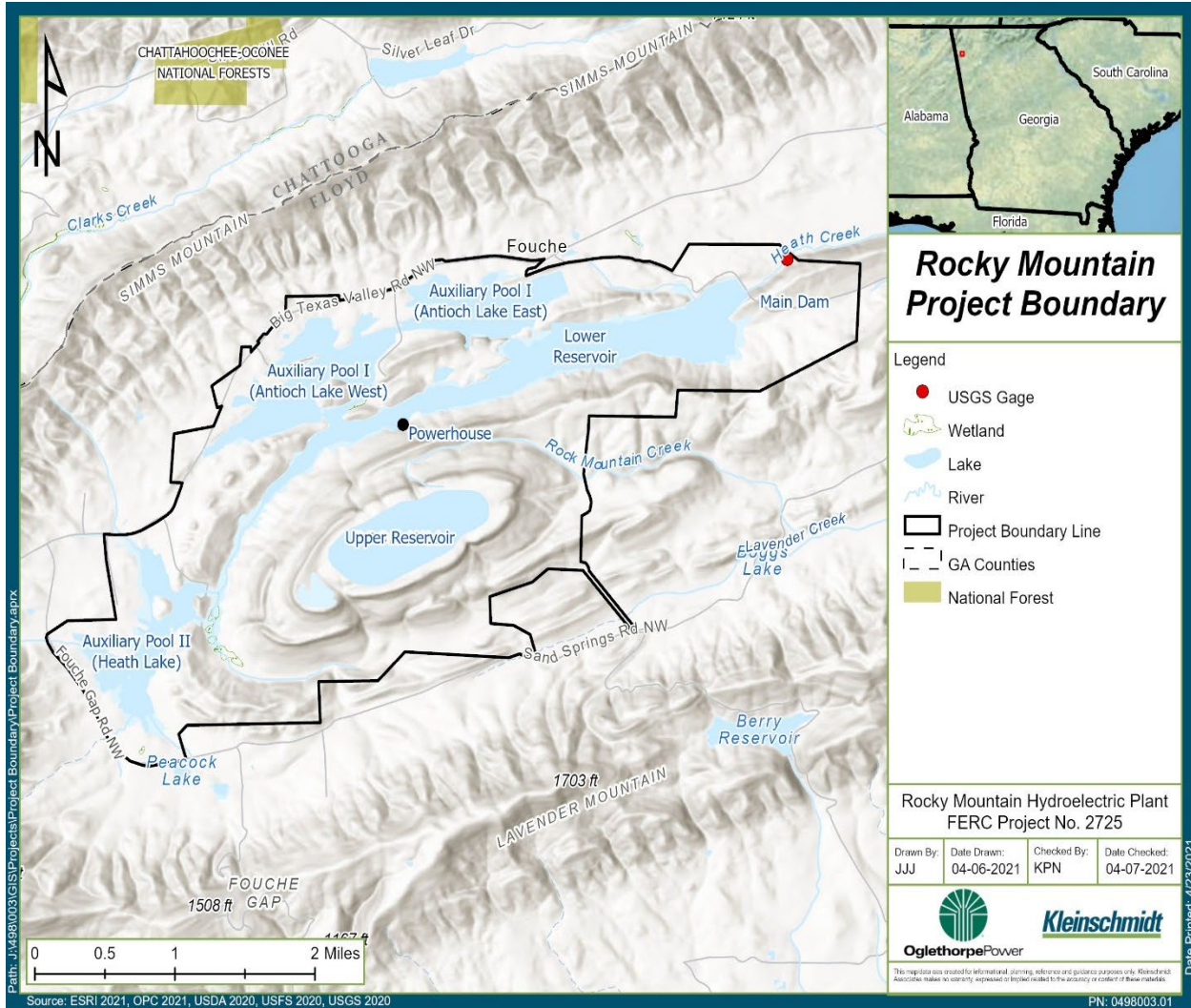


Figure 1 Project Boundary Map

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

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 farmstead	Not recommended
GP-FL-14/ CRFL14	The Clarence Montgomery Farm	20 th C. tenant house	Not evaluated

^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 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 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.

2.4 Schedule

The Cultural Resources Assessment will be completed according to the milestones in Table 2.

Table 2 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

From: [Jones, Craig](#)
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: [image003.png](#)
[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

Rocky Mountain Pumped Storage Hydroelectric Project

July 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

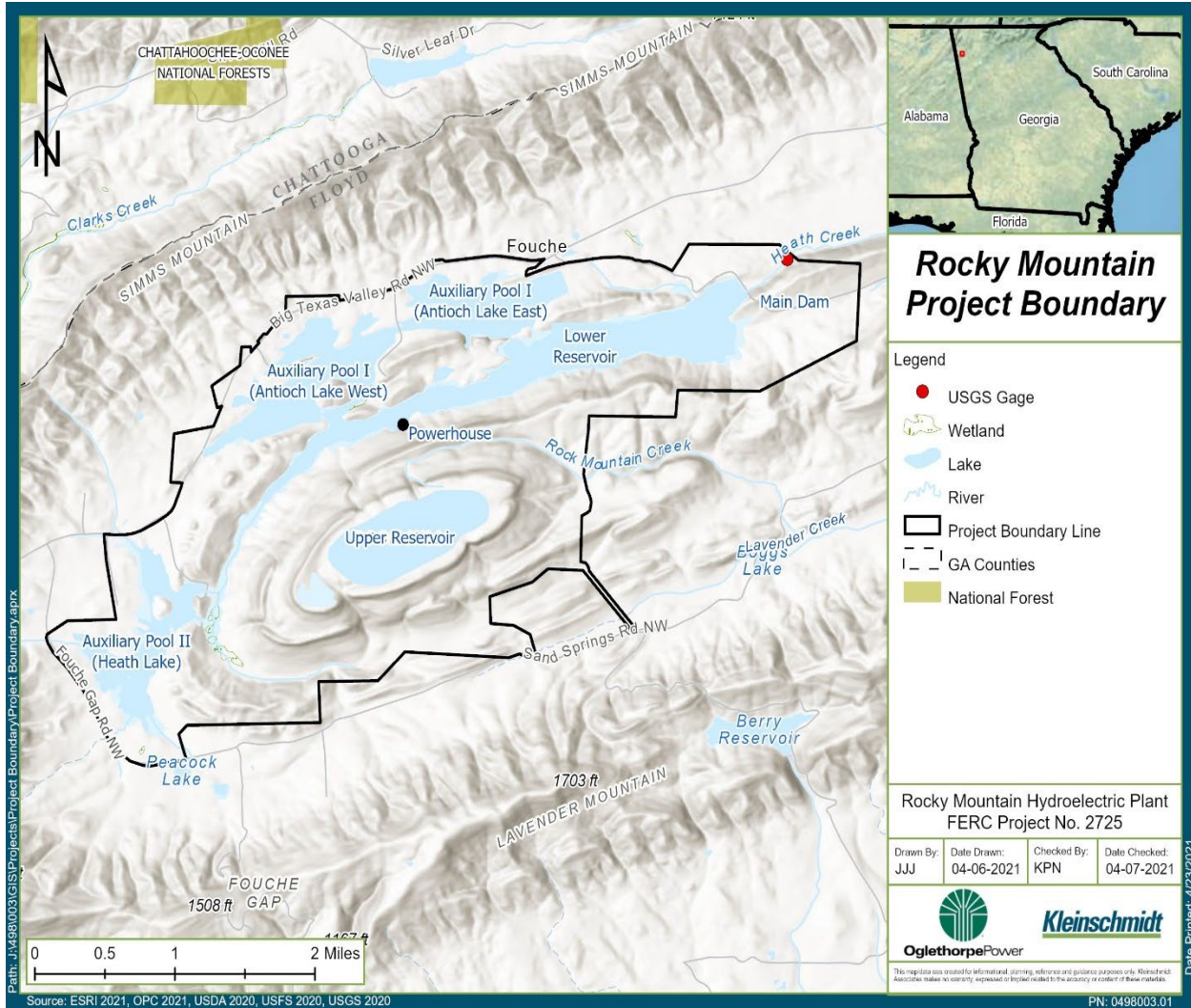


Figure 1 Project Boundary Map

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). 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)

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- Refine the site boundaries and update the site forms for three previously evaluated archaeological sites (9FL80, 9FL138, and 9FL148).
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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 include the FERC project boundary, encompassing the project facilities, Rocky Mountain PFA, and 5,000 acres of land and water.

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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	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 farmstead	Unknown ^b
GP-FL-14/ CRFL14	The Clarence Montgomery Farm	20 th C. tenant house	Unknown

^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.

^b Previously assessed as not eligible; unknown by current standards.

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 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 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.

2.4 Schedule

The Cultural Resources Assessment will be completed according to the milestones in Table 2.

Table 2 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

From: [ER](#)
To: [Jones, Craig](#)
Cc: [Steven Layman](#); [McCaslin, Tyler](#); snorris@trccompanies.com; jmeadows@nwgrc.org
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](#).



ER
Georgia Department of Community Affairs

er@dca.ga.gov

Brian P. Kemp
Governor



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,

A handwritten signature in blue ink that reads "Stacy Rieke".

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.



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, Box 7
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.

Sincerely,

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

ENV-RM-22-65

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 Townsend, 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

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

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:

1. 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 GADNR's 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 GADNR'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

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,

A handwritten signature in black ink that reads "Ted Will".

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:

1. 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 GADNR's 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.
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.

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.

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 (*Ptychobranhus 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

Digitally signed by PETER
MAHOLLAND
Date: 2022.05.13 13:42:46
-04'00'

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

From: [Jones, Craig](#)
To: [Marcinek, Paula](#); [Escobar, Anakela](#)
Cc: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: RE: RMPSP fish meeting
Date: Thursday, August 11, 2022 12:54:08 PM
Attachments: [image001.png](#)

Will do, Paula. Best, cj

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 <craig.jones@opc.com>
Sent: Thursday, August 11, 2022 11:46 AM
To: Marcinek, Paula <Paula.Marcinek@dnr.ga.gov>; 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,

cj

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 <tyler.mccaslin@opc.com>; 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 <Paula.Marcinek@dnr.ga.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>
Subject: RE: RMPSP fish meeting

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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 Layman](#)
Subject: Rocky Mountain Fish Survey Discussion
Date: Thursday, August 11, 2022 12:58:31 PM
Attachments: [image001.png](#)

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: [image001.png](#)

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>; Childers1, Richard <richard.childers1@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>
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
Get [Outlook for Android](#)

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 <richard.childers1@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>
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.

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' <richard.childers1@dnr.ga.gov>

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

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 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 <richard.childers1@dnr.ga.gov>
Cc: Shiley, Dennis <dennis.shiley@dnr.ga.gov>; Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Jones, Craig <craig.jones@opc.com>
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 richard.childers1@dnr.ga.gov. 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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GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Hakala, Jim <Jim.Hakala@dnr.ga.gov>
Sent: Wednesday, June 15, 2022 11:59 AM
To: McCaslin, Tyler <tyler.mccaslin@opc.com>
Cc: Childers1, Richard <richard.childers1@dnr.ga.gov>
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 <tyler.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

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



From: [McCaslin, Tyler](#)
To: ["kponcho@coushatta.org"](mailto:kponcho@coushatta.org)
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](#)
[image001.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

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



From: [McCaslin, Tyler](#)
To: ["er@dca.ga.gov"](mailto:tyler.mccaslin@opc.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
Date: Wednesday, August 17, 2022 5:43:00 PM
Attachments: [Rocky Mountain Responses to Agency Comments.pdf](#)
[image001.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

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



From: [McCaslin, Tyler](#)
To: ["jennifer.dixon@dca.ga.gov"](mailto: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](#)
[image001.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

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



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
Date: Thursday, August 18, 2022 7:51:04 AM
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,

Maria R. Clark

NEPA Section – Region 4
Strategic Programs Office
U.S. Environmental Protection Agency
61 Forsyth Street, SW
Atlanta, GA 30303
Phone# 404-562-9513

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,

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



Final Study Plans

Rocky Mountain Pumped Storage Hydroelectric Project

August 2022

FERC No. 2725

Prepared with Kleinschmidt Associates



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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.

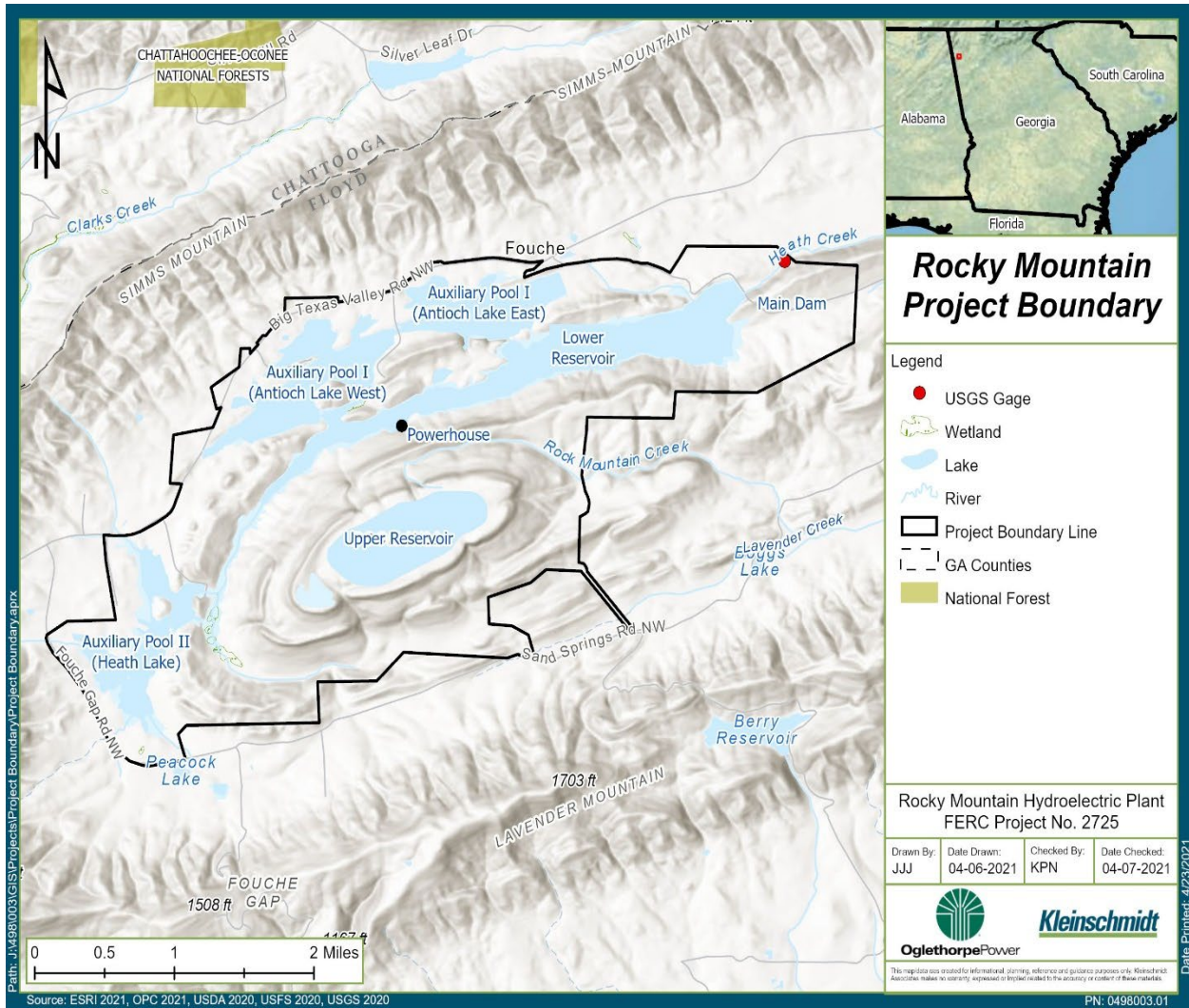


Figure 1 Project Boundary Map

2.0 WATER QUALITY 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.

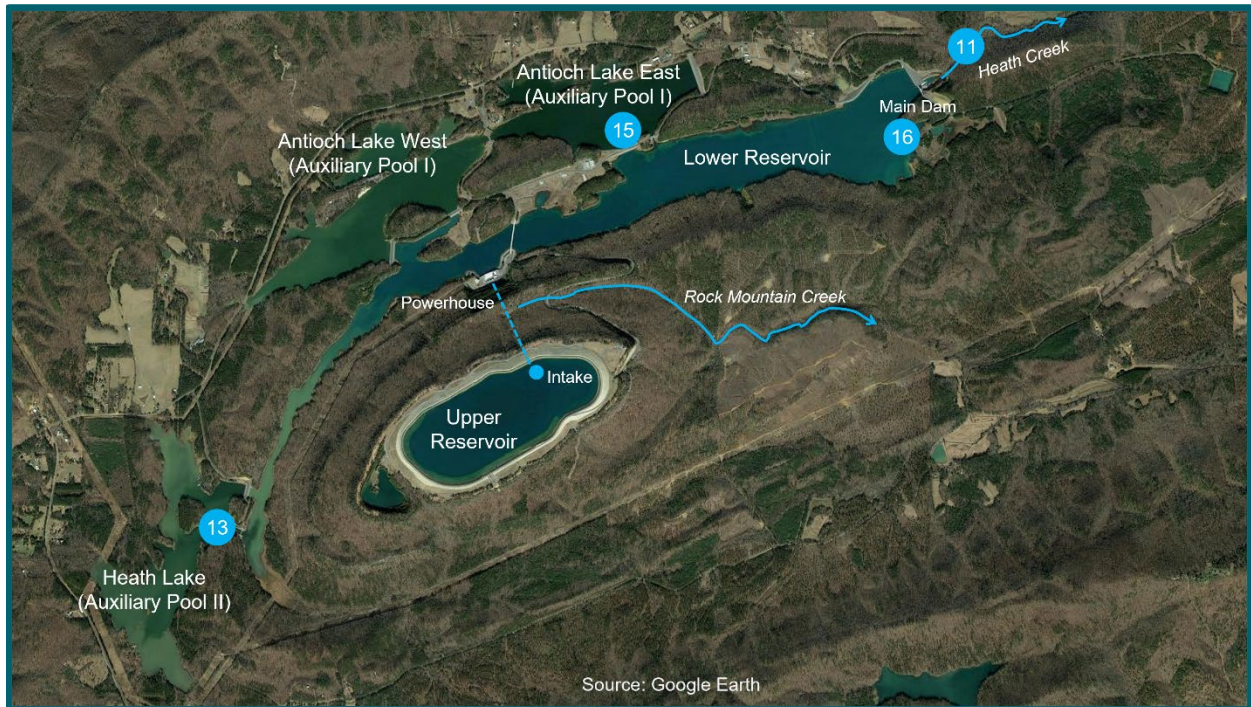
2.3 Methodology

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

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 (nitrate-nitrite), 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).

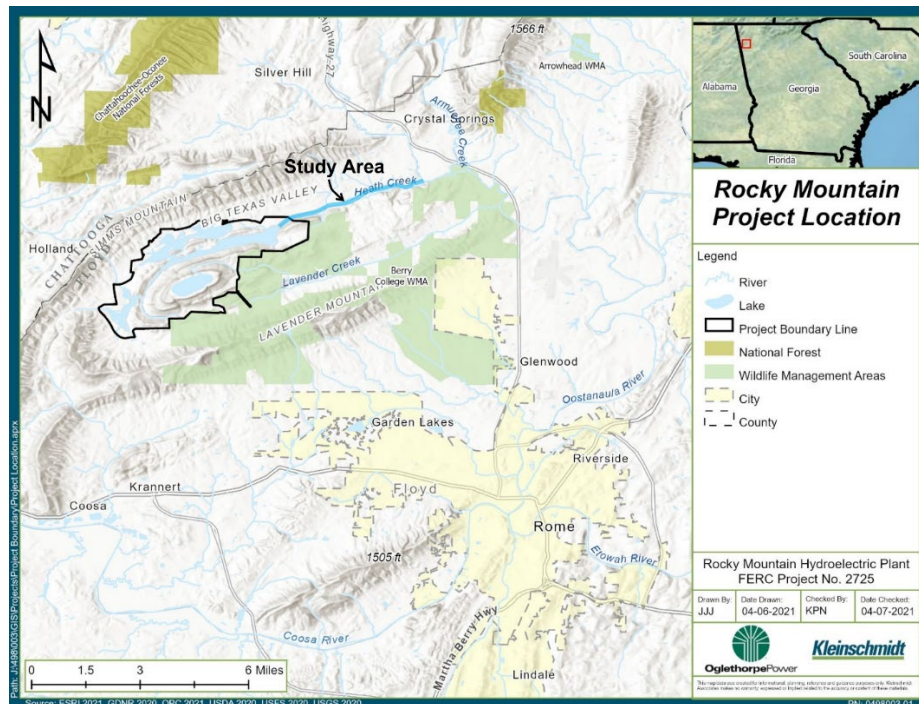


Figure 3 Heath Creek Study Area for Aquatic Resources Study

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:			
<i>Elliptio arca</i>	Alabama spike		E
<i>Hamiota altilis</i>	Finelined pocketbook	LT	T
<i>Medionidus acutissimus</i>	Alabama moccasinshell	LT	E
<i>Medionidus parvulus</i>	Coosa moccasinshell	LE	E
<i>Pleurobema decisum</i>	Southern clubshell	LE	E
<i>Pleurobema georgianum</i>	Southern pigtoe	LE	E
<i>Ptychobranthus foremanianus</i>	Rayed kidneyshell	LE	E
<i>Ptychobranthus greenii</i>	Triangular kidneyshell	LE	
<i>Villosa umbrans</i>	Coosa creekshell	UR	R
Snails:			
<i>Leptoxis foremani</i>	Interrupted rocksnail	LE	E
<i>Pleurocera showalteri</i>	Upland hornsnail		R

^a Federal status: LE = listed endangered; LT = listed threatened; UR = under review.

^b Georgia state status: E = endangered; T = threatened; R = rare.

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.

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.

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 vegetative 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

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 reconnaissance surveys	June-September 2022; 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 on-site 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 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.

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.

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.
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Location: <input type="checkbox"/> Main <input type="checkbox"/> Beach <input type="checkbox"/> Heath		Date:		Time:	
Interviewer:					
Vehicle Type: <input type="checkbox"/> Vehicle w/ Trailer <input type="checkbox"/> Vehicle w/o Trailer <input type="checkbox"/> RV/Camper					
1. What is your county and state of residence?			County:		State:
2. What is your zip code? _____					
3. How many people (including you) are in your group today? _____ people					
4. What is your age?		<input type="checkbox"/> 18-24	<input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44	<input type="checkbox"/> 45-54 <input type="checkbox"/> 55+
5. If you came with others, what are their age groups? (check all that apply)					
<input type="checkbox"/> Children (Infants-12)	<input type="checkbox"/> Youth (13-17)	<input type="checkbox"/> Adults (18-55)	<input type="checkbox"/> Senior Adults (over 55)		
6. How did you hear about the area?					
<input type="checkbox"/> Friend/Relative	<input type="checkbox"/> Social Media	<input type="checkbox"/> Other			
7. How many times (including today), have you visited Rocky Mtn PFA in the last 30 days? _____					
8. What is the primary reason for your visit today? (check all that apply)					
<input type="checkbox"/> Boat Fishing	<input type="checkbox"/> Picnicking	<input type="checkbox"/> Hiking	<input type="checkbox"/> Canoeing/kayaking		
<input type="checkbox"/> Bank Fishing	<input type="checkbox"/> Swimming	<input type="checkbox"/> Biking	<input type="checkbox"/> Wildlife viewing		
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Pleasure Boating	<input type="checkbox"/> Shoreline relaxation		
<input type="checkbox"/> Other:					
9. If you came to fish today, how would you rate your fishing experience?					
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
10. If you came to fish today, where did you fish?					
<input type="checkbox"/> Antioch Lake East	<input type="checkbox"/> Antioch Lake West	<input type="checkbox"/> Heath Lake			
11. If you came to hunt today, how would you rate your hunting experience?					
<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)	
12. Please rate the quality of the existing facilities at this access area. (choose one for each)					
Parking:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Boat Ramp:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Docks:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Restrooms:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Bank Fishing:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Beach:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Picnic Areas:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Campsites:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Trails:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> Very Poor (1)
Cleanliness:	<input type="checkbox"/> Very Good (5)	<input type="checkbox"/> Good (4)	<input type="checkbox"/> Fair (3)	<input type="checkbox"/> Poor (2)	<input type="checkbox"/> 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 people (including you) are in your group today? _____ people						
3. What is your age?		___ 18-24	___ 25-34	___ 35-44	___ 45-54	___ 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 would you rate the online booking experience for camping reservations?						
___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)		
6. What activities are you participating in while camping? (check all that apply)						
___ Boat Fishing	___ Picnicking	___ Hiking	___ Canoeing/kayaking			
___ Bank Fishing	___ Swimming	___ Biking	___ Wildlife Viewing			
___ Hunting	___ Pleasure Boating	___ Shoreline relaxation	___ Other (list below):			
7. While camping at Rocky Mountain PFA, are you staying in:						
___ Tent	___ RV	___ Tent/RV Combo	___ Group Camp			
8. Please rate the quality of the existing camping facilities. (choose one description for each)						
Campsite:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Playground:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Restrooms:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Cleanliness:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (2)	___ Very Poor (1)	
Bank Fishing:	___ Very Good (5)	___ Good (4)	___ Fair (3)	___ Poor (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.						

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.

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 farmstead	Unknown ^b
GP-FL-14/ CRFL14	The Clarence Montgomery Farm	20 th C. tenant house	Unknown

^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.

^b Previously assessed as not eligible; unknown by current standards.

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

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.

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 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.

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: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: RE: GADNR Botany suggestions for RMPSP
Date: Thursday, October 27, 2022 2:10:38 PM
Attachments: [image002.png](#)

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](#)

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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: [image001.png](#)
[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 [final study plan](#), 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 GADNR 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

GADNR 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.

GADNR Comment:

"Review EDDMapS resources to identify invasive species in southeast."

OPC Response 2:

Consistent with GADNR'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.

GADNR 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 <craig.jones@opc.com>
Subject: GADNR Botany suggestions for RMPSP

External E-Mail

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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](#)

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General outline for Land Study Plans:

Describe history of land use and management (e.g. timbering and burning).

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Chapter 4: Terrestrial and Wetlands Resource Survey

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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: [Sibley, Jackson](#)
To: [Kelly Kirven](#)
Cc: [Hakala, Jim](#); [Steven Layman](#)
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

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From: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>
Sent: Friday, March 3, 2023 11:25:56 AM
To: Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>
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
[Facebook](#) • [Twitter](#) • [Instagram](#)
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From: Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
Sent: Thursday, March 2, 2023 12:39 PM
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.

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 <Jackson.Sibley@dnr.ga.gov>
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 <Steven.Layman@Kleinschmidtgroup.com>
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

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 <Kelly.Kirven@KleinschmidtGroup.com>
Sent: Thursday, March 2, 2023 9:15 AM
To: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>
Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>
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: [image001.png](#)

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 PM

To: 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 typos.

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: eric_bauer@fws.gov (preferred)

From: Jones, Craig <craig.jones@opc.com>

Sent: Tuesday, April 4, 2023 11:06 AM

To: Bauer, Eric F <eric_bauer@fws.gov>

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

Subject: [EXTERNAL] Rocky Mountain Relicensing Next Steps

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

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: [Stacy Rieke](#); [Jones, Craig](#)
Subject: RE: Rocky Mountain Relicensing Next Steps
Date: Thursday, April 13, 2023 11:27:03 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Mary Ann and Eli,

I have included links to our [Pre-Application Document](#) and [Final Study Plan](#) located on our [relicensing website](#). We sent the privileged Appendix F of the PAD to ER@dca.ga.gov 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](mailto:Elijah.Huszagh@dca.ga.gov)
<Elijah.Huszagh@dca.ga.gov>
Cc: [Stacy Rieke](mailto:Stacy.Rieke@dca.ga.gov) <Stacy.Rieke@dca.ga.gov>; [McCaslin, Tyler](mailto:tyler.mccaslin@opc.com) <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 <Stacy.Rieke@dca.ga.gov>
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 Affairs
Direct +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 <MaryAnn.Hawthorne@dca.ga.gov>; Stacy Rieke <Stacy.Rieke@dca.ga.gov>

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,
Eli



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Elijah Huszagh, RPA
Compliance Review Archaeologist
Georgia Department of Community Affairs

Direct [404-486-6440](tel:404-486-6440)
Elijah.Huszagh@dca.ga.gov

From: Jones, Craig <craig.jones@opc.com>
Sent: Tuesday, April 4, 2023 10:59 AM
To: Elijah Huszagh <Elijah.Huszagh@dca.ga.gov>; MaryAnn Hawthorne <MaryAnn.Hawthorne@dca.ga.gov>; ER <er@dca.ga.gov>
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

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' <Santiago.Martinez@dca.ga.gov>; ER <er@dca.ga.gov>
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: [Jones, Craig](#)
To: "Wei.Zeng@dnr.ga.gov"; "stephen.Wiedl@dnr.ga.gov"; "Elizabeth.Booth@dnr.ga.gov"
Cc: [McCaslin, Tyler](#); [Steven Layman](#)
Subject: Rocky Mountain Relicensing WQ Study Update Meeting
Date: Friday, April 14, 2023 10:10:09 AM
Attachments: [image001.png](#)

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: [image001.png](#)

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 <tyler.mccaslin@opc.com>; 'Steven Layman' <Steven.Layman@Kleinschmidtgroup.com>; 'Kelly Kirven' <Kelly.Kirven@KleinschmidtGroup.com>

Subject: Study Update Meeting with GDNR

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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 ½ 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

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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°

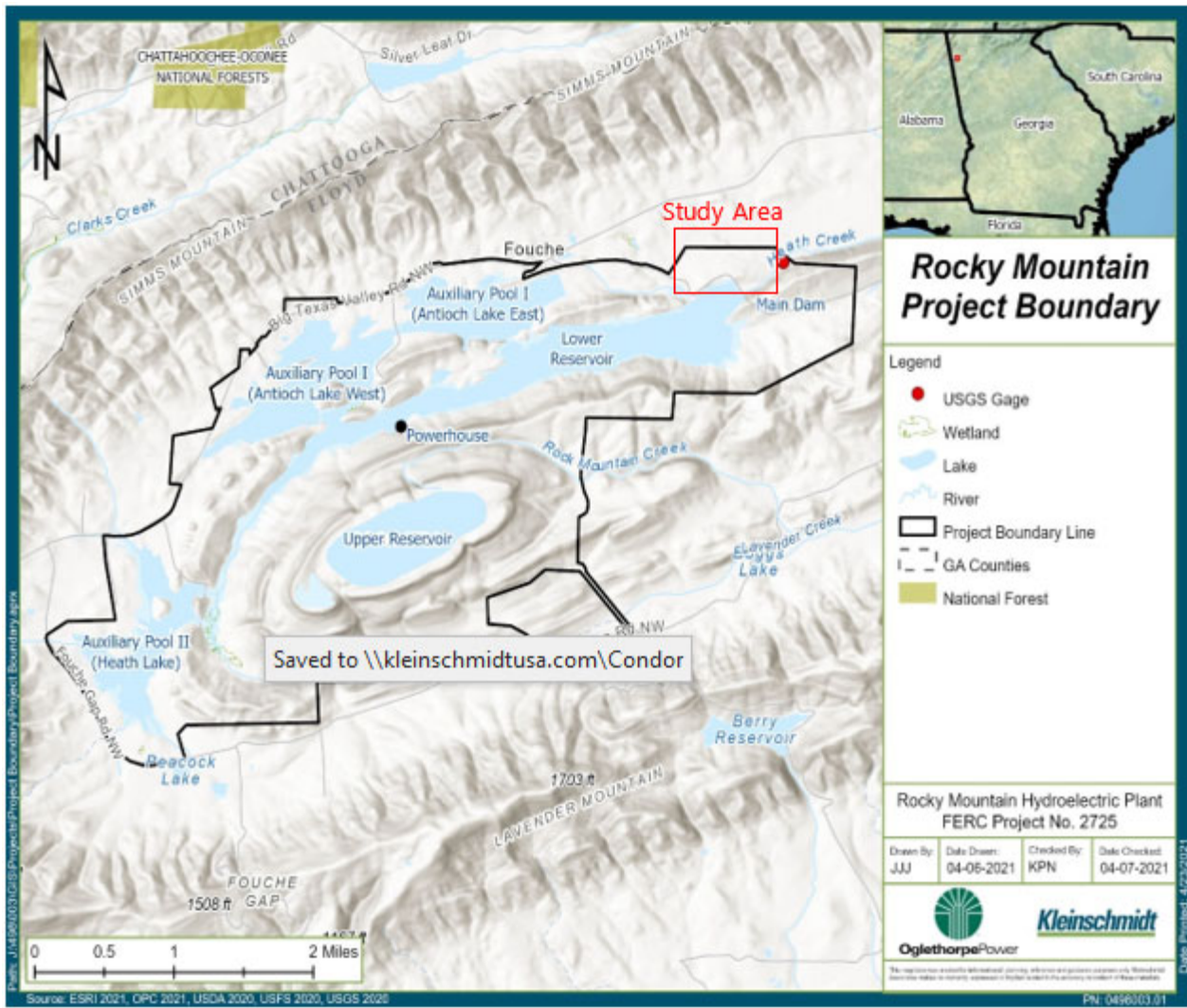


Figure 1 Project Boundary and Study Area

Trispot Darter Sampling Locations

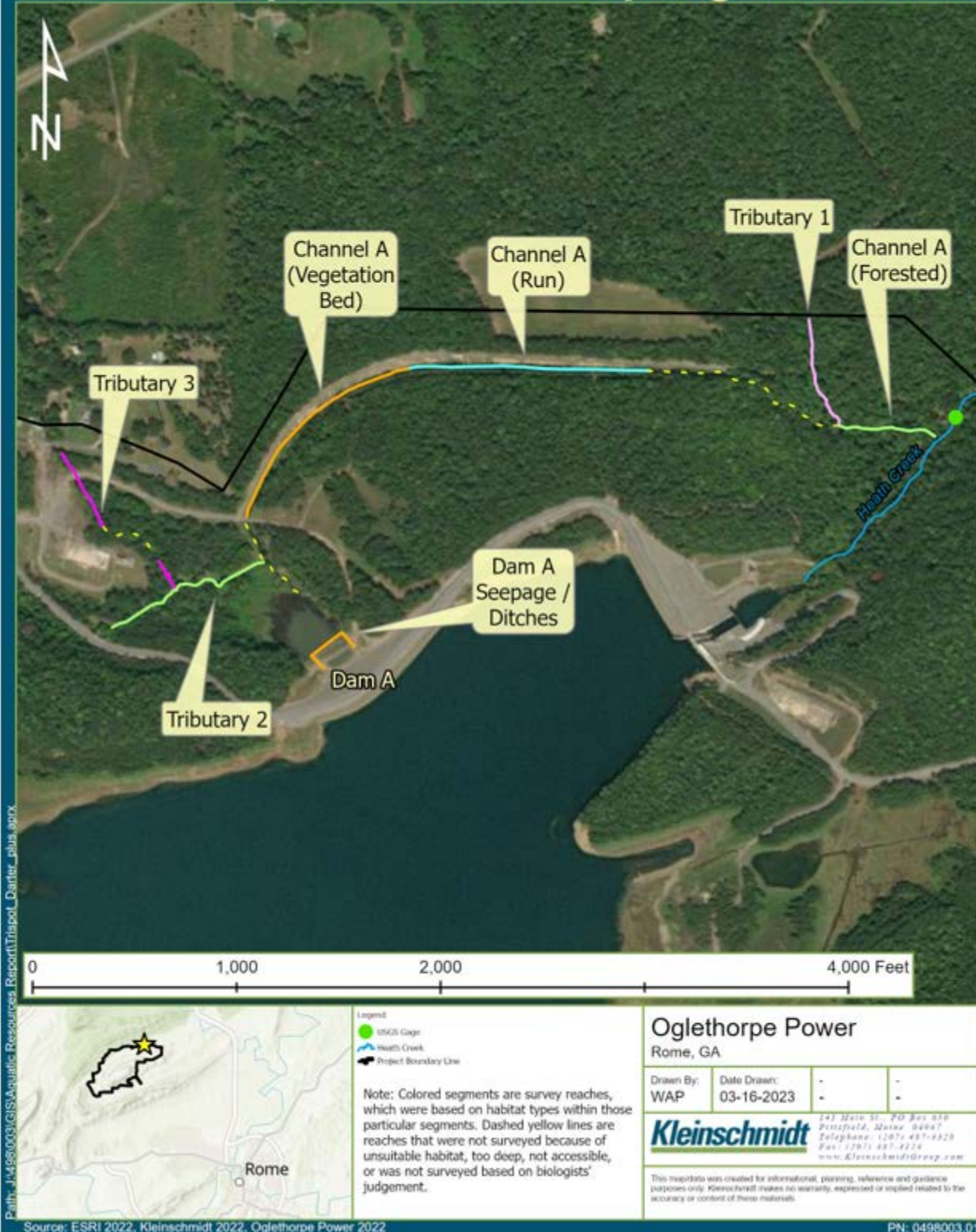


Figure 2 Survey Segments within the Study Area

Will Pruitt, CWB, CE

Project Scientist | Discipline Leader – Terrestrial, Wetlands, and Wildlife Group

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Office: 762.685.4953 | **Mobile:** 706.255.7741

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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 9th 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 typos.

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
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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, April 26, 2023 3:11 PM
To: Bauer, Eric F <eric_bauer@fws.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Steven Layman <Steven.Layman@Kleinschmidtgroup.com>; 'Kelly Kirven' <Kelly.Kirven@KleinschmidtGroup.com>
Subject: [EXTERNAL] Study Update and Preliminary Results Meeting

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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: [Jones, Craig](#)
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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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.

Month	Total Campsites	Total Visitation	Occupancy 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

Wildlife Resources Division

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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 <Jackson.Sibley@dnr.ga.gov>
Sent: Thursday, May 18, 2023 10:36 AM
To: Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>
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 <Kelly.Kirven@KleinschmidtGroup.com>
Sent: Thursday, May 18, 2023 9:17 AM
To: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>
Cc: Hakala, Jim <Jim.Hakala@dnr.ga.gov>
Subject: RE: Rocky Mountain PFA Campground Data

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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 <Jackson.Sibley@dnr.ga.gov>
Sent: Thursday, May 18, 2023 9:15 AM
To: Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
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](#)
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From: Kelly Kirven <Kelly.Kirven@KleinschmidtGroup.com>
Sent: Thursday, May 18, 2023 9:06 AM
To: Sibley, Jackson <Jackson.Sibley@dnr.ga.gov>
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

Office: 803.462.5633
Cell: 423.747.2660

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 Hedeem, GEPD

Craig Jones, Oglethorpe Power Corporation (OPC)

Tyler McCaslin, OPC

Christina Barrows, OPC

Steve Layman, Kleinschmidt Associates

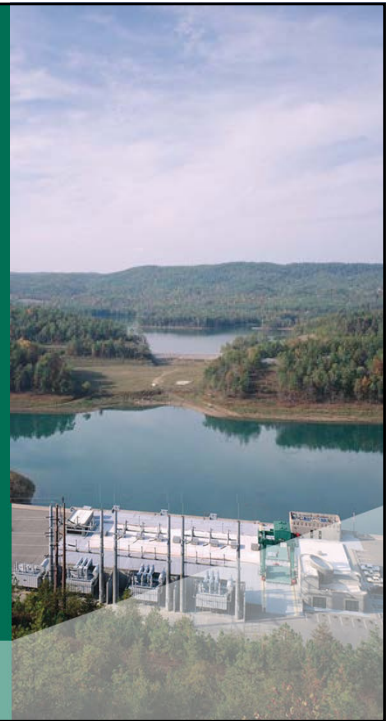
Prepared by: Steve Layman

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.

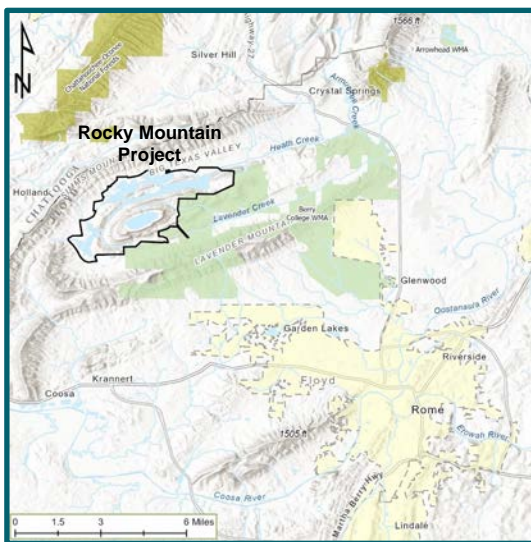
Rocky Mountain Relicensing Study Update and Preliminary Results Meeting

May 2023



1

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

2

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

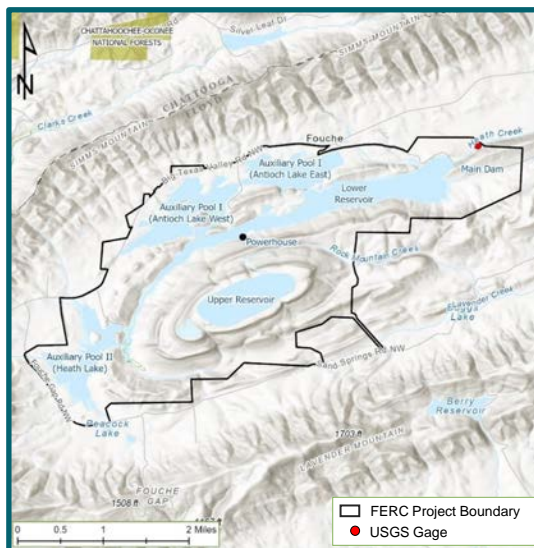


- ▶ ACT River basin – 22,739 sq mi
- ▶ Coosa River – 10,156 sq mi
 - Oostanaula River – 2,150 sq mi
 - Armuchee Creek – 226 sq mi
 - Heath Creek – 16.6 sq mi
- ▶ Nine dams on Coosa and Alabama Rivers downstream of Project

★ Rocky Mountain Project

3

Rocky Mountain Project Boundary

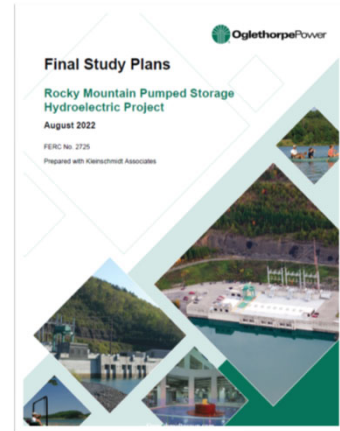


- ▶ Encompasses 5,000 acres of land and water
- ▶ Extends to about 0.3 mi downstream on Heath Creek
- ▶ Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- ▶ Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek

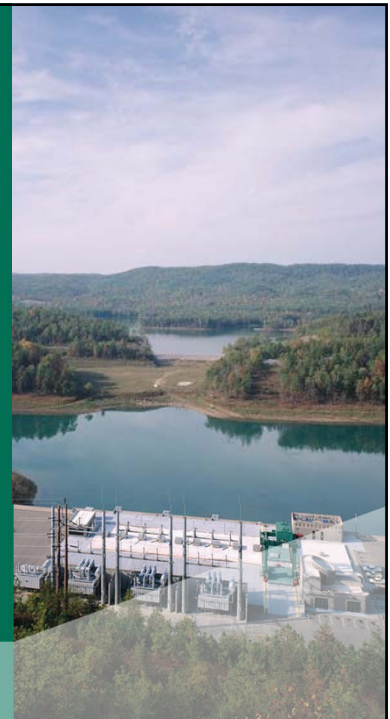
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Rocky Mountain Relicensing Studies

- ▶ 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



Water Quality Assessment



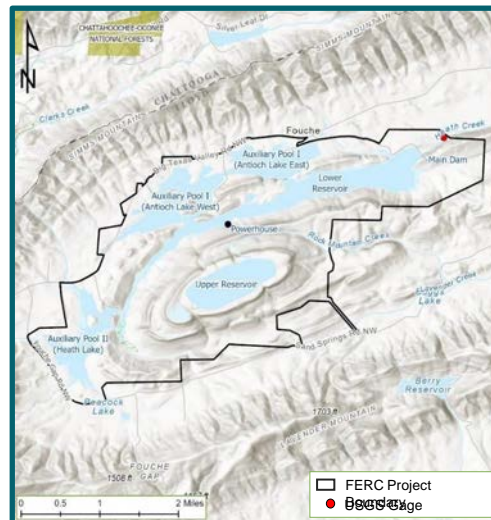
Study Objectives

- ▶ 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

7

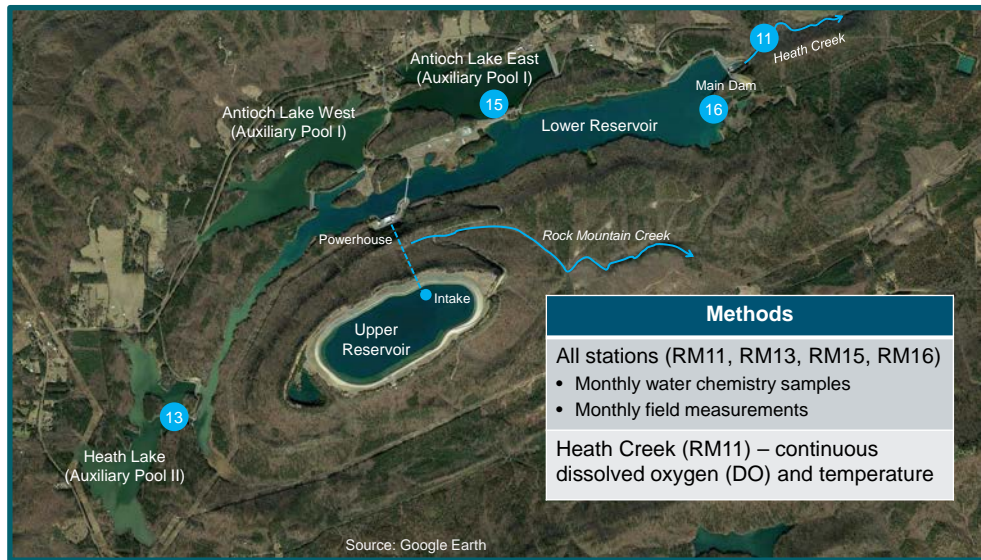
Study Area

- ▶ Lower Reservoir, Auxiliary Pool I (Antioch Lake), Auxiliary Pool II (Heath Lake), and Heath Creek downstream of the Main Dam within the project boundary



8

Water Quality Monitoring Stations



10/19/2023

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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)	

10/19/2023

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10

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 (mg/L)	# Detections	0	1	2	0
	Min	NA	0.160	0.180	NA
	Avg	NA	0.160	0.438	NA
	Max	NA	0.160	0.696	NA
TKN (mg/L)	# Detections	4	9	9	3
	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 (mg/L)	# Detections	9	3	2	8
	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 (mg/L)	# Detections	0	2	4	0
	Min	NA	0.006	0.005	NA
	Avg	NA	0.032	0.039	NA
	Max	NA	0.057	0.064	NA
Orthophosphate (mg/L)	# Detections	1	0	0	0
	Min	0.030	NA	NA	NA
	Avg	0.030	NA	NA	NA
	Max	0.030	NA	NA	NA
BOD (mg/L)	# Detections	3	5	5	2
	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)	pH	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

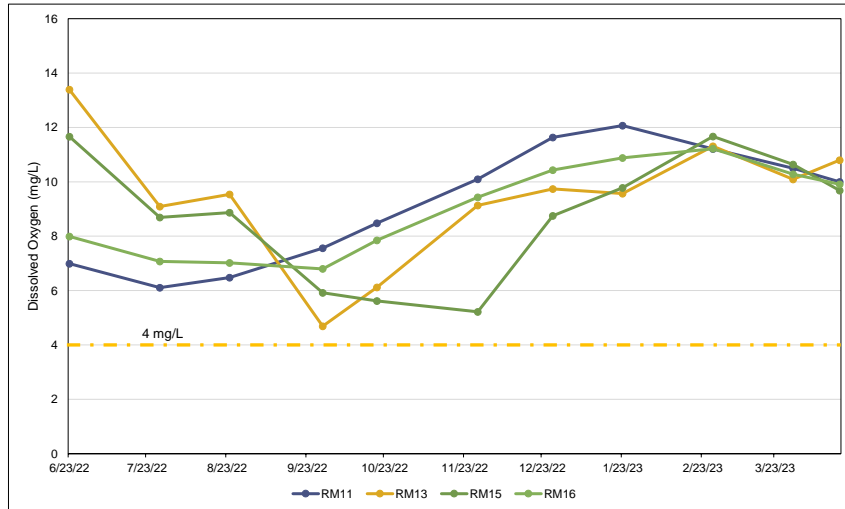
- ▶ Results met applicable water quality numeric criteria with exception of some pH values at two stations
- ▶ pH values exceeded 8.5 on a few occasions at Auxiliary Pools I and II
 - DO supersaturation indicates high levels of primary production (photosynthesis)
 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

10/19/2023

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Preliminary Results – Monthly Field DO Measurements



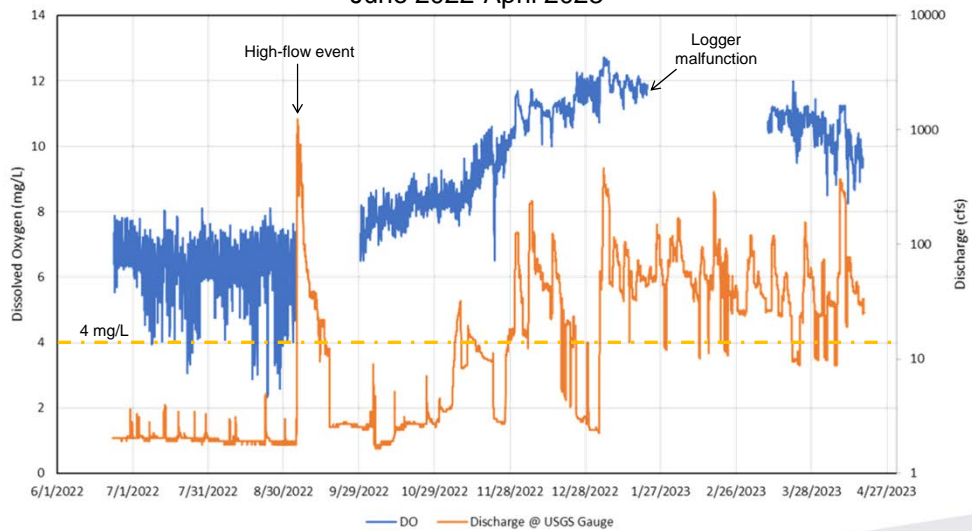
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Preliminary Results – Continuous Monitoring in Heath Creek

June 2022-April 2023



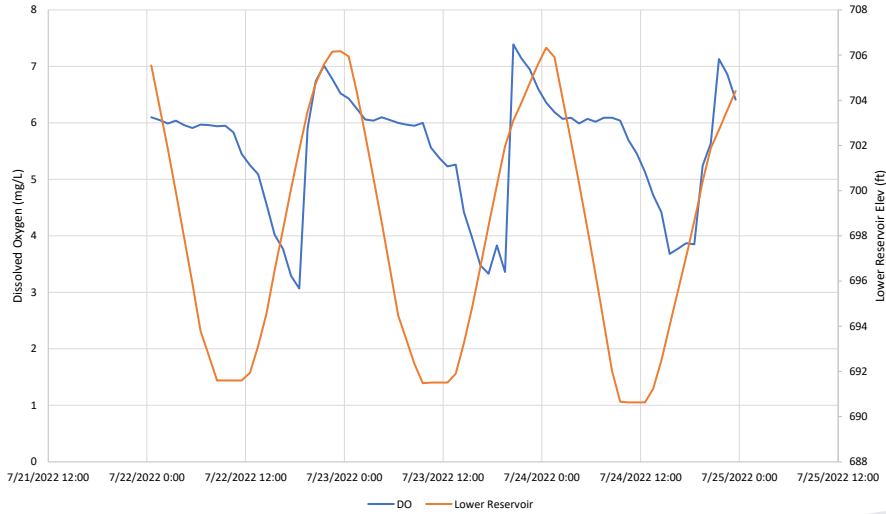
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Preliminary Results – Continuous Monitoring in Heath Creek

July 22-24, 2022



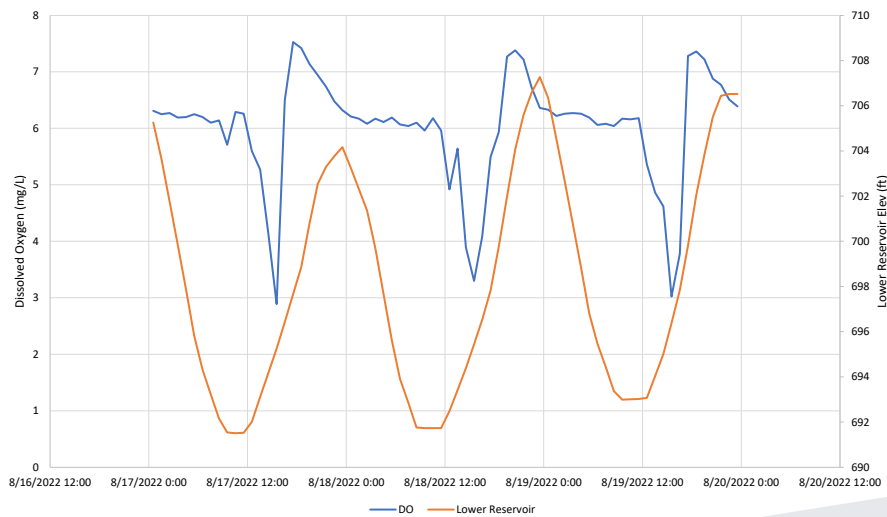
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Preliminary Results – Continuous Monitoring in Heath Creek

August 17-19, 2022



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

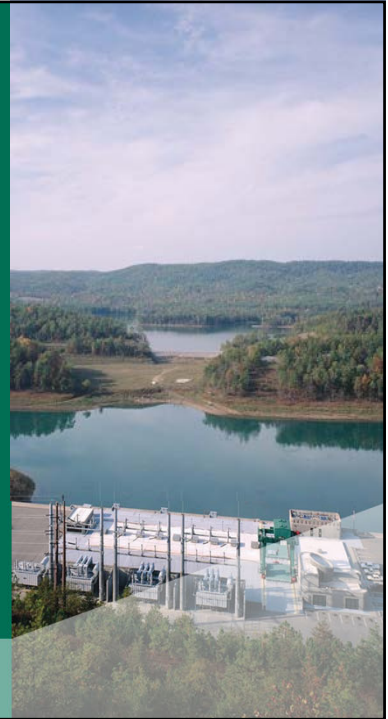
Prepared by: Steve Layman

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.

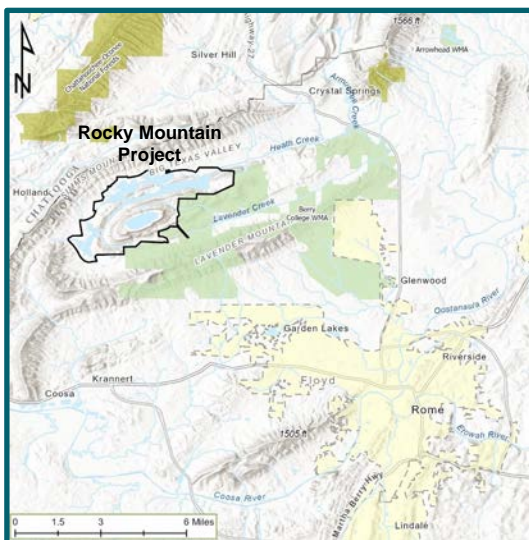
Rocky Mountain Relicensing Study Update and Preliminary Results Meeting

May 2023



1

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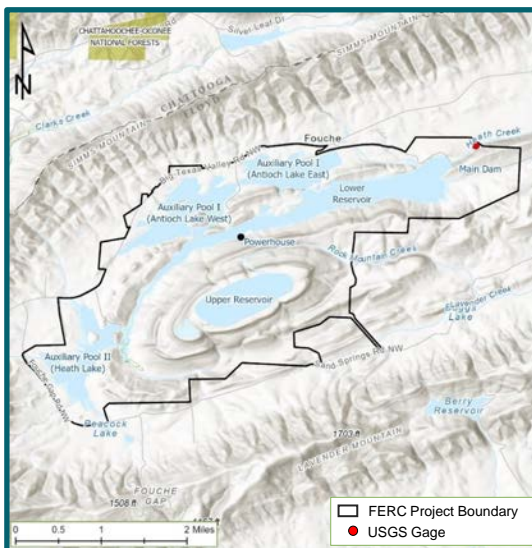


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★ Rocky Mountain Project

3

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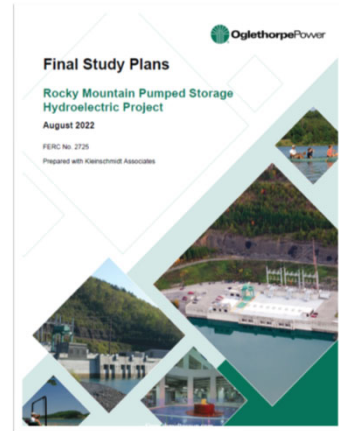


- ▶ Encompasses 5,000 acres of land and water
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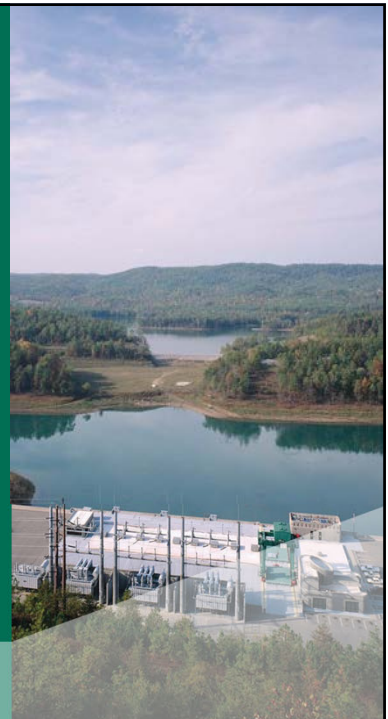
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Rocky Mountain Relicensing Studies

- ▶ Water Quality Assessment
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Water Quality Assessment



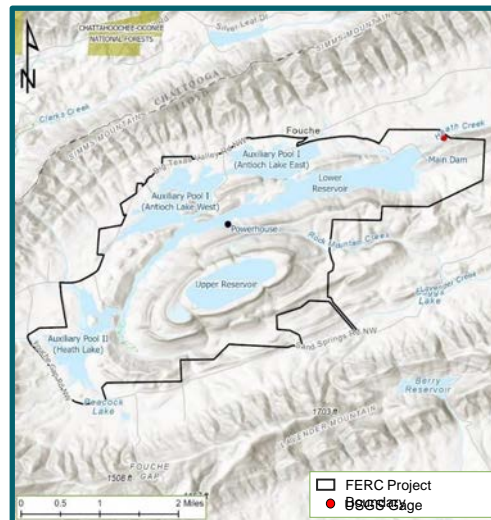
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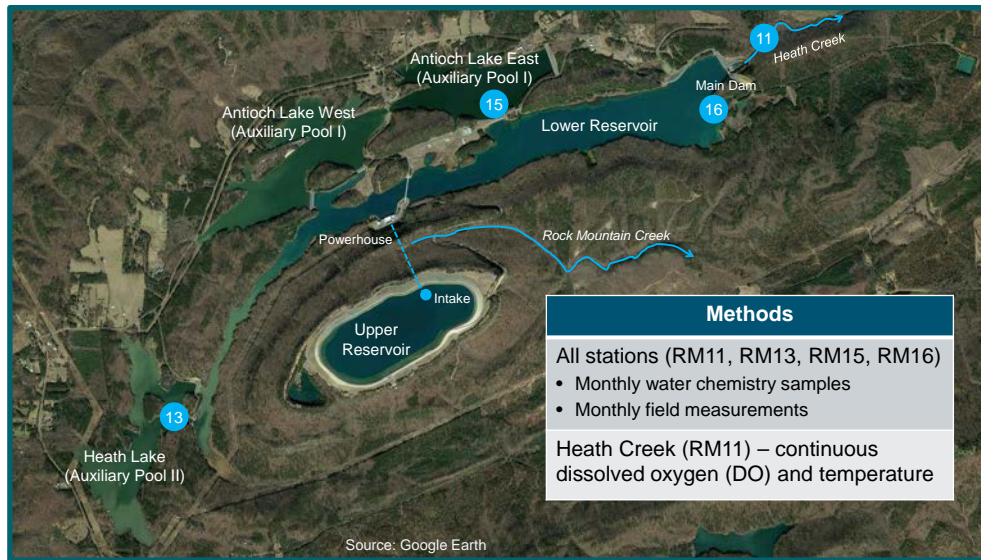
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8

Water Quality Monitoring Stations



Methods

All stations (RM11, RM13, RM15, RM16)

- Monthly water chemistry samples
- Monthly field measurements

Heath Creek (RM11) – continuous dissolved oxygen (DO) and temperature

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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
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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)
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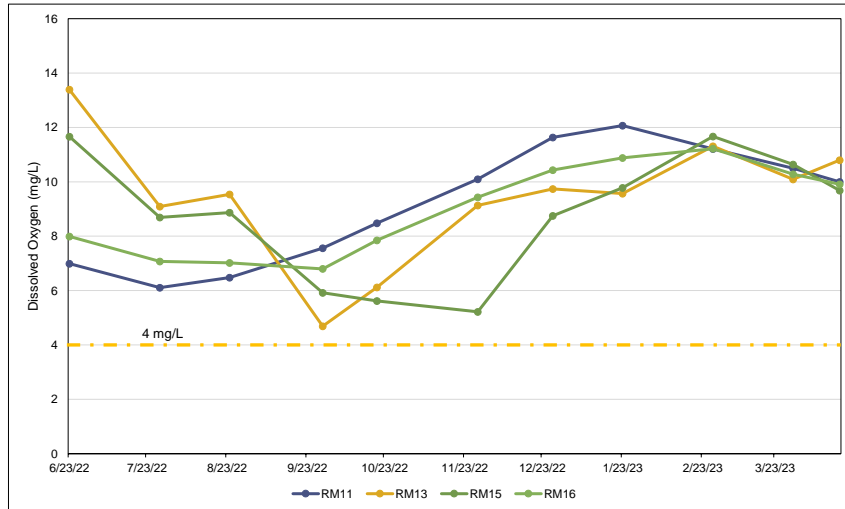
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 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

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Preliminary Results – Monthly Field DO Measurements



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Preliminary Results – Continuous Monitoring in Heath Creek

June 2022-April 2023

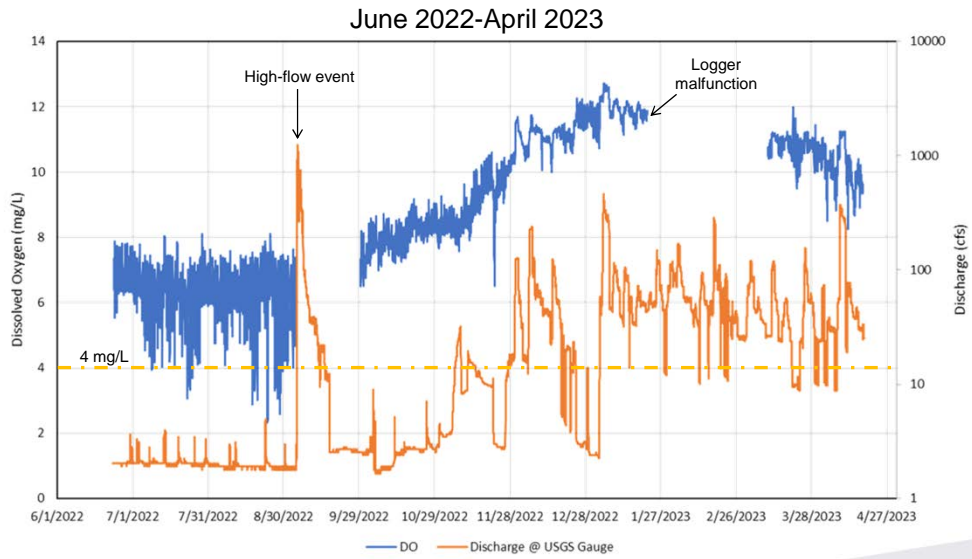


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Preliminary Results – Continuous Monitoring in Heath Creek

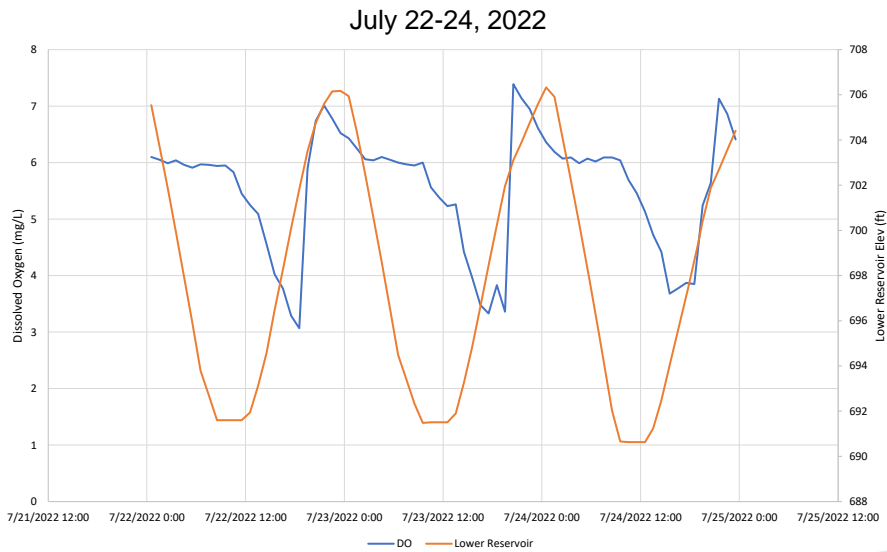


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Preliminary Results – Continuous Monitoring in Heath Creek



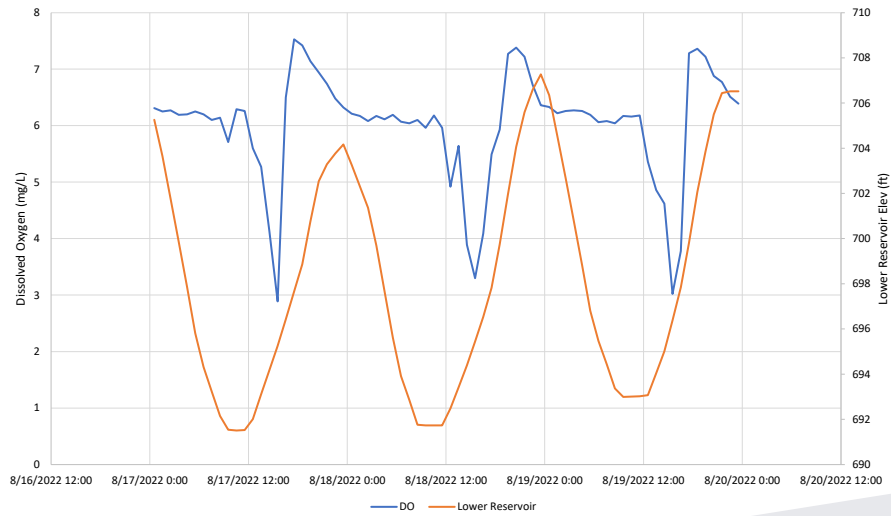
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Preliminary Results – Continuous Monitoring in Heath Creek

August 17-19, 2022



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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
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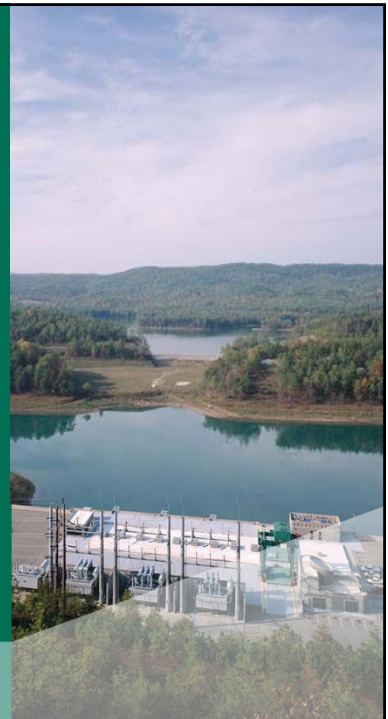
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Questions and Discussion

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Aquatic Resources Study



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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

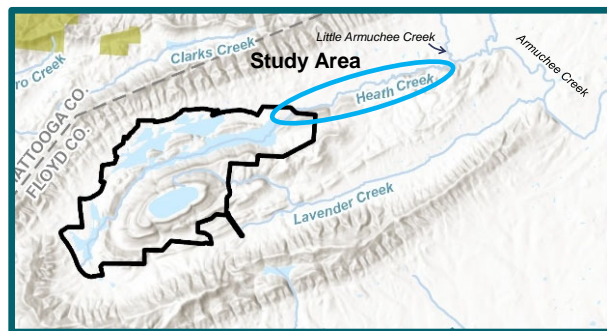
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Study Area

- ▶ Heath Creek from the Main Dam downstream to its confluence with Little Armuchee Creek
 - Approximately 4-mile reach



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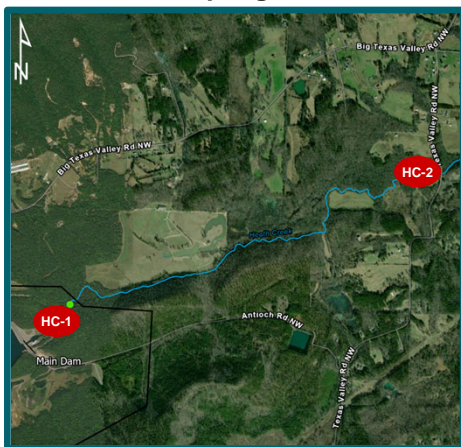
Methods

- ▶ 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

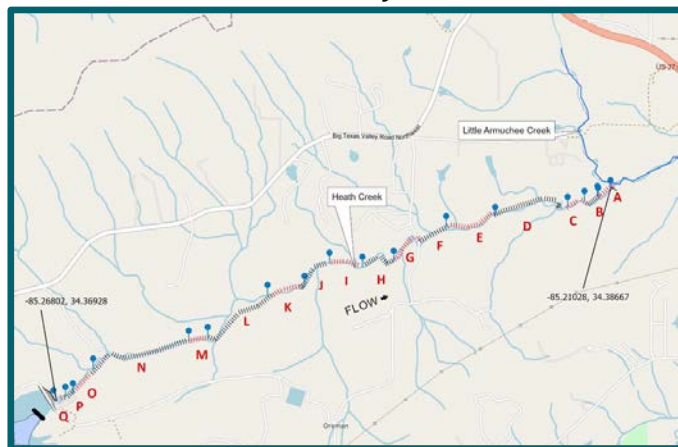


Sampling Areas

Fish Sampling Stations



Mussel Survey Reach



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
<i>Villosa vibex</i>	Southern Rainbow	93	63.3	26	1
<i>Leaunio lienosa</i> (<i>Villosa lienosa</i>)	Little Spectaclecase	53	36.1	258	4
<i>Cambarunio nebulosus</i> (<i>Villosa nebulosa</i>)	Alabama Rainbow	1	0.7	1	--
<i>Utterbackia imbecillis</i>	Paper Pondshell	--	--	2	--
Total		147			

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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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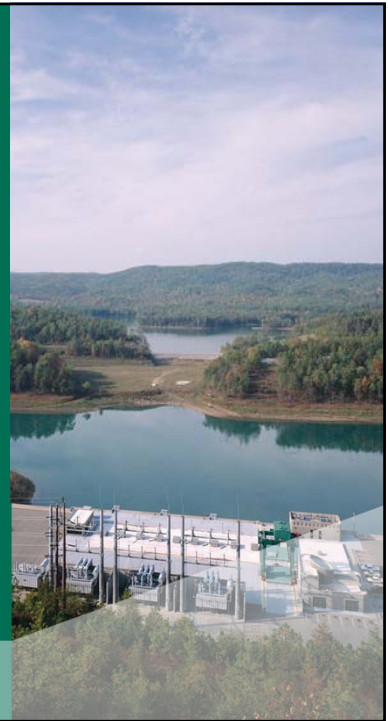
Questions and Discussion

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Trispot Darter Survey



Source: GDNr Biodiversity Portal; photo by Dave Neely



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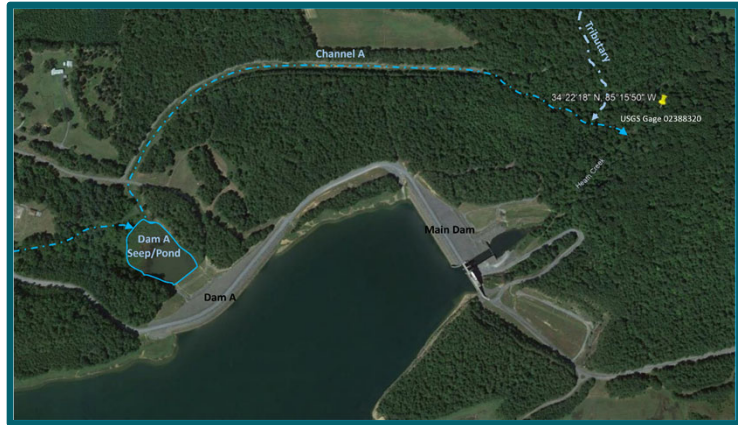
Study Objectives

- ▶ 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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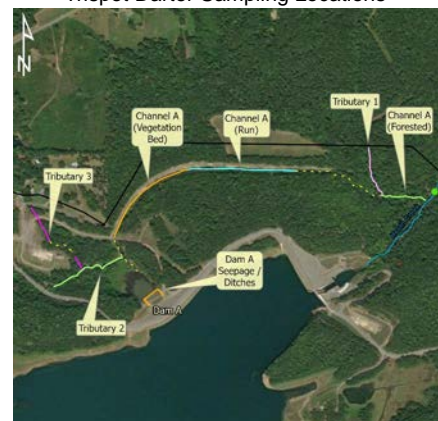
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Methods

- ▶ 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

Trispot Darter Sampling Locations



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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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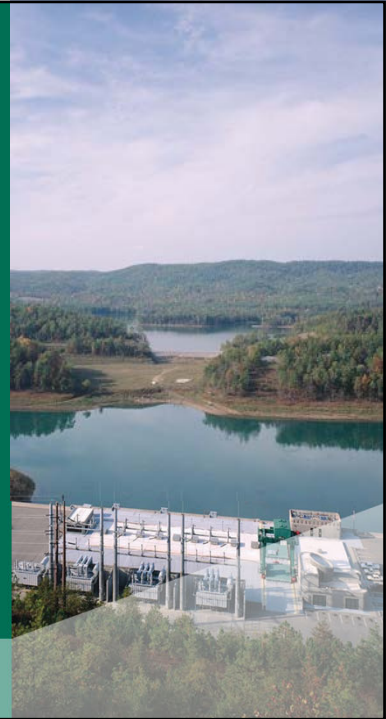
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Questions and Discussion

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Terrestrial and Wetland Resources Survey



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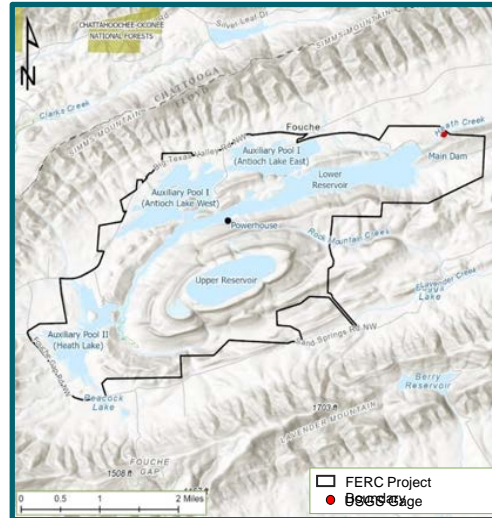
Study Objectives

- ▶ 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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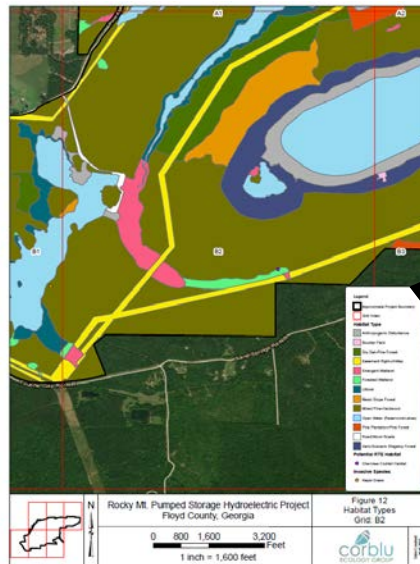
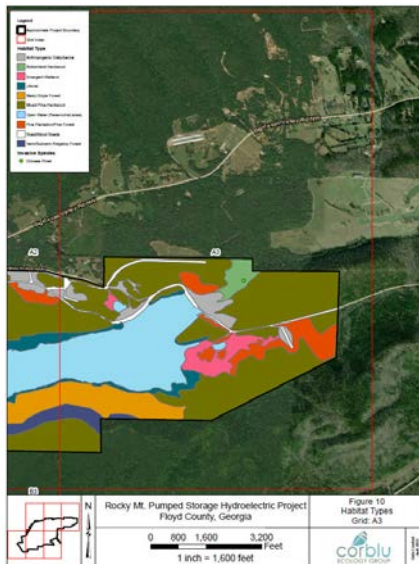
Terrestrial and Wetland Preliminary Findings

- ▶ 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



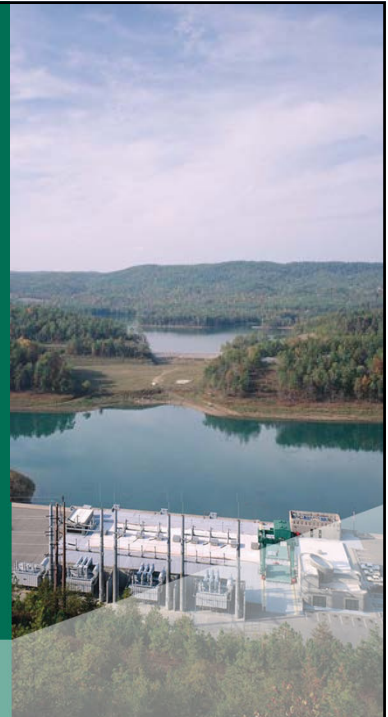
Legend

- Approximate Project Boundary
- Grid Index
- Habitat Type**
 - Anthropogenic Disturbance
 - Boulder Field
 - Dry Oak-Pine Forest
 - Easement Right-of-Way
 - Emergent Wetland
 - Forested Wetland
 - Littoral
 - Mesic Slope Forest
 - Mixed Pine-Hardwood
 - Open Water (Reservoirs/Lakes)
 - Pine Plantations/Pine Forest
 - Road/Wood Roads
 - Xeric/Subseric Ridge-top Forest
- Potential RTE Habitat**
 - Cherokee Clubtail Habitat
- Invasive Species**
 - Nepal Grass

Questions and Discussion

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Recreation Use Analysis



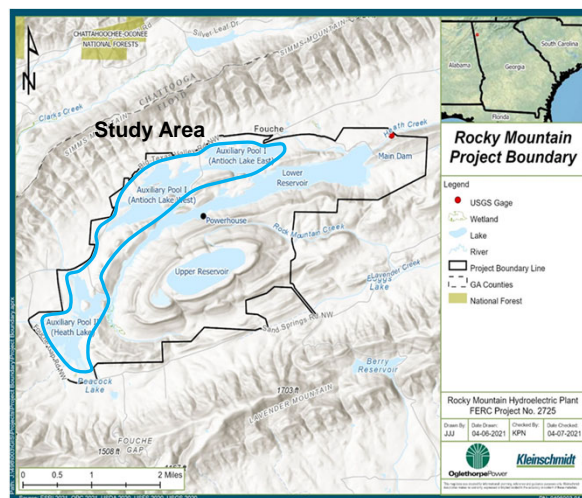
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Study Objectives

- 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

Study Area

- ▶ Rocky Mountain PFA
 - Auxiliary Pool I (Antioch Lake East and West)
 - Auxiliary Pool II (Heath Lake)



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 is conducting this survey to learn about recreational use at Rocky Mountain Public Fishing Area (PFPA), 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	Main	Beach	Heath	Date	Time
Interviewer					
Vehicle Type	Vehicle w/ Trailer	Vehicle w/o Trailer	RV/Camper		
1. What is your county and state of residence?	County	State			
2. What is your zip code?	people				
3. How many people (including you) are in your group today?					
4. What is your age?	18-24	25-34	35-44	45-54	55+
5. 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)		
6. How did you hear about the area?	Other				
7. How many times (including today) have you visited Rocky Mtn PFA in the last 30 days?					
8. What is the primary reason for your visit today? (check all that apply)					
Boat Fishing	Panhandling	Hiking	Canoing/kayaking		
Bank Fishing	Swimming	Biking	Wildlife viewing		
Camping	Hunting	Pleasure boating	Strenuous relaxation		
Other:					
9. 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)	
10. If you came to fish today, where did you fish?					
11. 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)	
12. Please rate the quality of the existing facilities at this access area (choose one for each):					
Parking	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Boat Ramp	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Docks	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Restrooms	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Bank Fishing	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Beach	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Picnic Areas	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Campsites	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Trails	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
Cleanliness	Very Good (5)	Good (4)	Fair (3)	Poor (2)	Very Poor (1)
13. List any specific improvements you would like to see at Rocky Mountain PFA, and any other comments or suggestions.					

Recreation Use Analysis Preliminary Findings

Location	Surveys Collected through April 1, 2023
Beach	109
Main	46
Heath	63
Campground	24
Total	242

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%

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

Facility Ratings – Collected at Main, Beach, and Heath

Facilities	Rating				
	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

Facilities	Rating				
	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)

Improvements, Comments and Suggestions – Beach Location
Lifeguard
Power outlets at pavilion
Clean more
Docks could use railings, need more toilets, automatic flushers, more separated dressing rooms repair some grills, need a map of the trails, cell service is lacking
Better grills, signs for trails
More parking
Concession stand
Larger beach and swimming area
Better marked trails, deeper swimming area
More docks, more picnic tables closer to water, bathroom closer to water
Pool, splash pad
Splash pads, more stuff for kids
Take some debris out of reservoir - fishing line gets snagged
More shade, get rid of ants
Tight parking spaces, get rid of ants, deeper and larger swimming area
Bigger swim area
Signs for directions
More showers in bathroom, electrical outlets and water in wrong place - when you back in the hook ups are on the wrong side, narrow camp spots
Electrical and water hookups for camping on wrong side and camping spots are narrow
Need more than 1 ramp at Antioch West, more bathrooms and showers
Floating dock with a slide to keep kids off floating buoy line, need an indoor shower in the bathroom
People leaving trash and bait cups occasionally, otherwise very clean
More signage for trails, cleaner bathrooms
Cleaner bathrooms - they can get messy by end of the day
Air circulation in restrooms
One of the trails floods when rains - very muddy
Shade options by the sand
Wider parking spots, more regular cleaning in the bathrooms throughout the day, people smoking
Doesn't like how camping requires reservations now - didn't know that

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Recreation Use Analysis Preliminary Findings

2022 Annual Recreation Use Estimates at the Rocky Mountain PFA by Month

Month	Main, Beach, and Heath Entrance Attendance	Campground Attendance
January	7,727	71
February	15,371	142
March	14,235	450
April	25,330	844
May	37,325	777
June	56,891	824
July	40,433	836
August	20,708	647
September	18,414	742
October	16,119	717
November	13,441	502
December	7,224	142
Total	273,218	6,694
Grand Total	279,912	

Source: GDNR 2022

Questions and Discussion

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

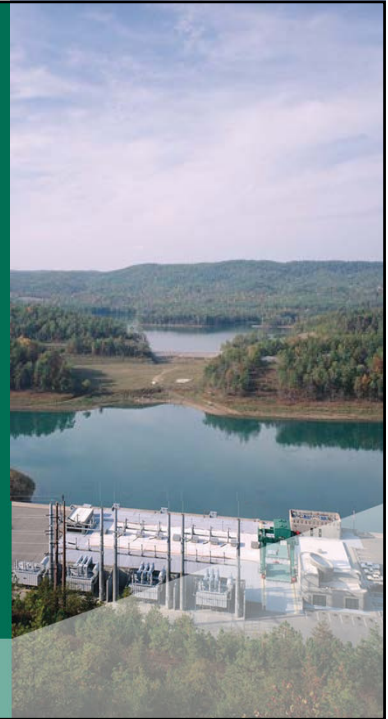
Prepared by: Steve Layman

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.

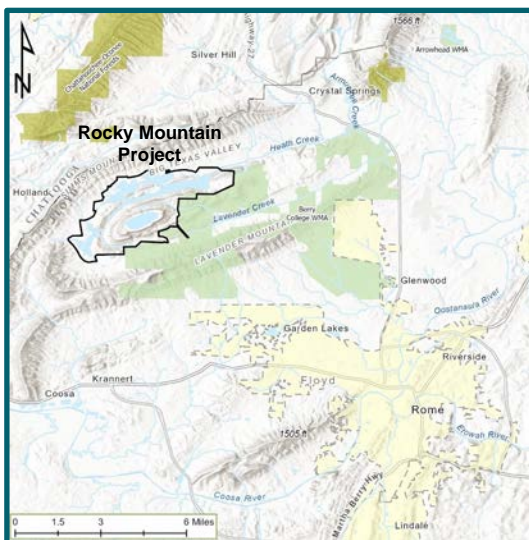
Rocky Mountain Relicensing Study Update and Preliminary Results Meeting

May 2023



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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

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



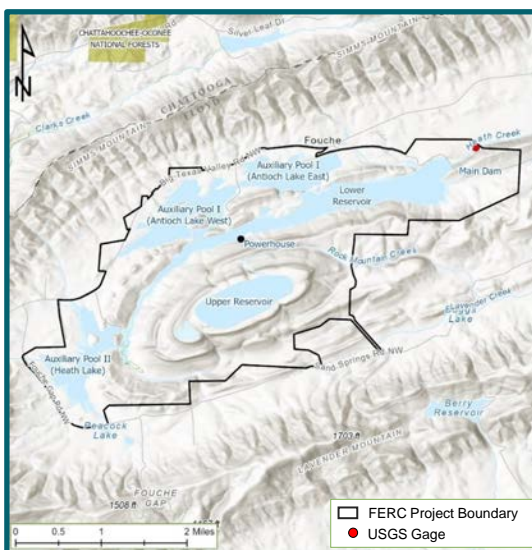
Source: U.S. Army Corps of Engineers (2014)

- ▶ 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

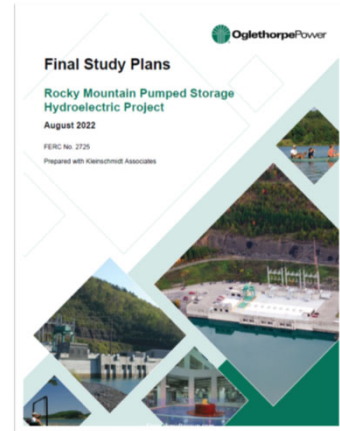


- ▶ Encompasses 5,000 acres of land and water
- ▶ Extends to about 0.3 mi downstream on Heath Creek
- ▶ Lower Reservoir and Auxiliary Pools on Heath Creek and small tributaries
- ▶ Upper Reservoir on drainage divide between Heath Creek and Rock Mountain Creek

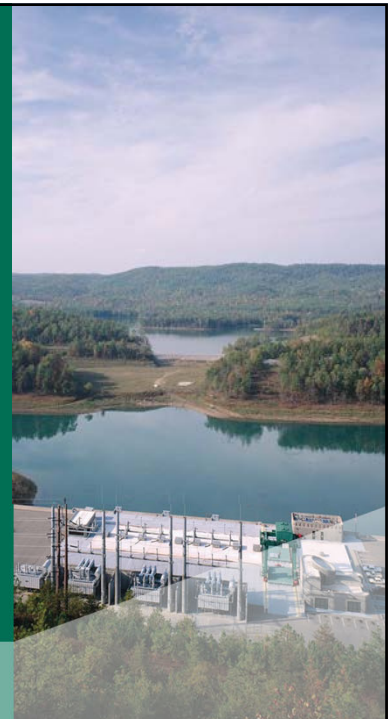
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Rocky Mountain Relicensing Studies

- ▶ Water Quality Assessment
- ▶ Aquatic Resources Study
- ▶ Terrestrial & Wetland Resources Survey
- ▶ Recreation Use Analysis
- ▶ Cultural Resources Assessment
 - Archaeological Assessment
 - Architectural Assessment
- ▶ Trisport Darter Survey
 - Scoped with FWS and GDNR in fall 2022



Water Quality Assessment



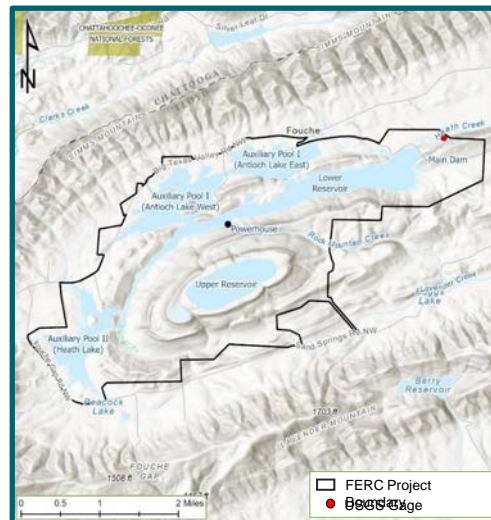
Study Objectives

- ▶ 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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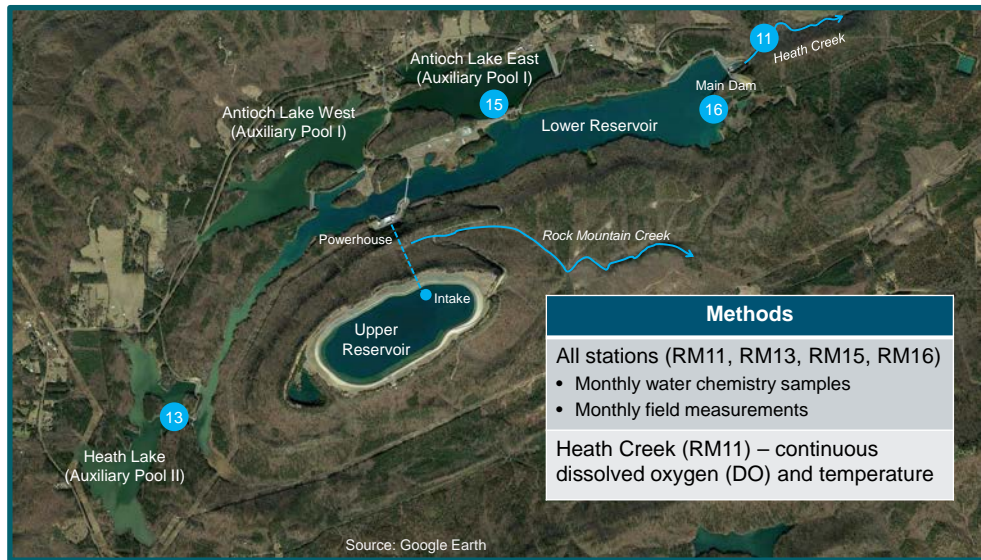
Study Area

- ▶ 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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Water Quality Monitoring Stations



Methods

All stations (RM11, RM13, RM15, RM16)

- Monthly water chemistry samples
- Monthly field measurements

Heath Creek (RM11) – continuous dissolved oxygen (DO) and temperature

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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 (mg/L)	# Detections	0	1	2	0
	Min	NA	0.160	0.180	NA
	Avg	NA	0.160	0.438	NA
	Max	NA	0.160	0.696	NA
TKN (mg/L)	# Detections	4	9	9	3
	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 (mg/L)	# Detections	9	3	2	8
	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 (mg/L)	# Detections	0	2	4	0
	Min	NA	0.006	0.005	NA
	Avg	NA	0.032	0.039	NA
	Max	NA	0.057	0.064	NA
Orthophosphate (mg/L)	# Detections	1	0	0	0
	Min	0.030	NA	NA	NA
	Avg	0.030	NA	NA	NA
	Max	0.030	NA	NA	NA
BOD (mg/L)	# Detections	3	5	5	2
	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)	pH	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

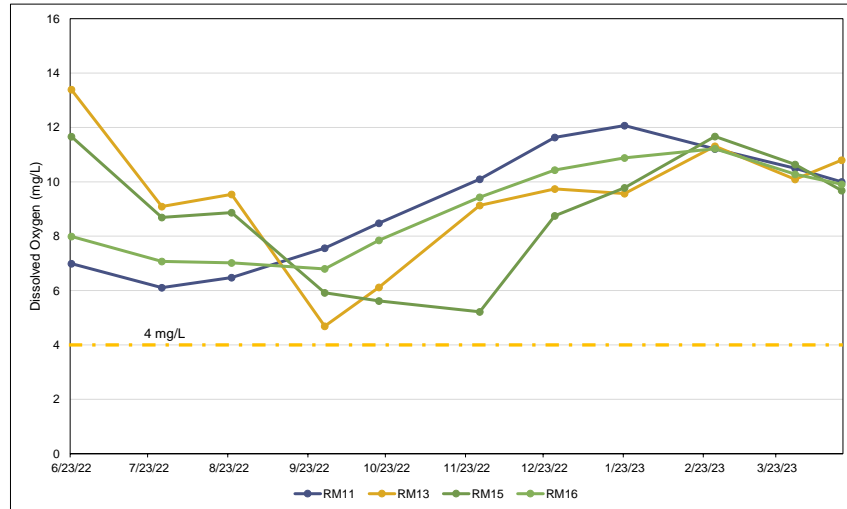
- ▶ Results met applicable water quality numeric criteria with exception of some pH values at two stations
- ▶ pH values exceeded 8.5 on a few occasions at Auxiliary Pools I and II
 - DO supersaturation indicates high levels of primary production (photosynthesis)
 - Pools fertilized to enhance fish production for Rocky Mountain Public Fishing Area
 - Maximum values also exceeded 8.5 in previous sampling

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Preliminary Results – Monthly Field DO Measurements



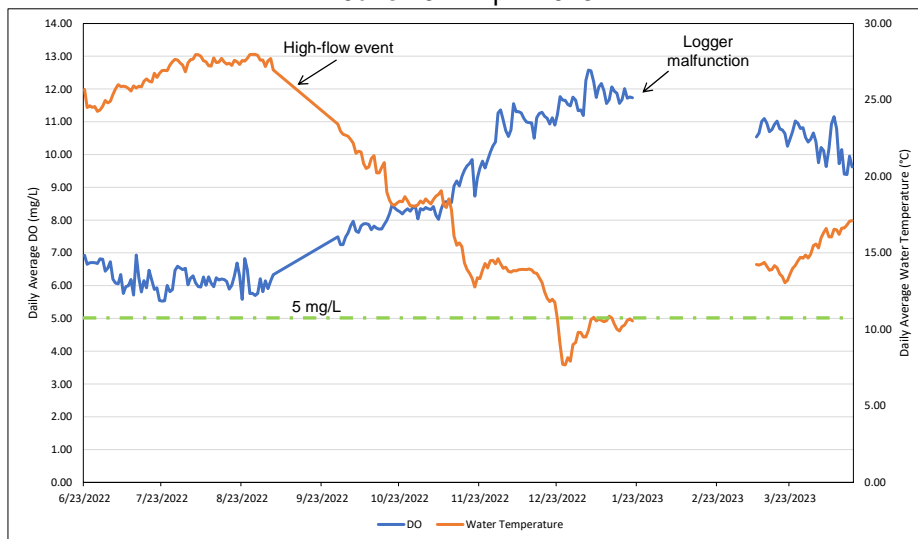
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Preliminary Results – Continuous Monitoring in Heath Creek

June 2022-April 2023

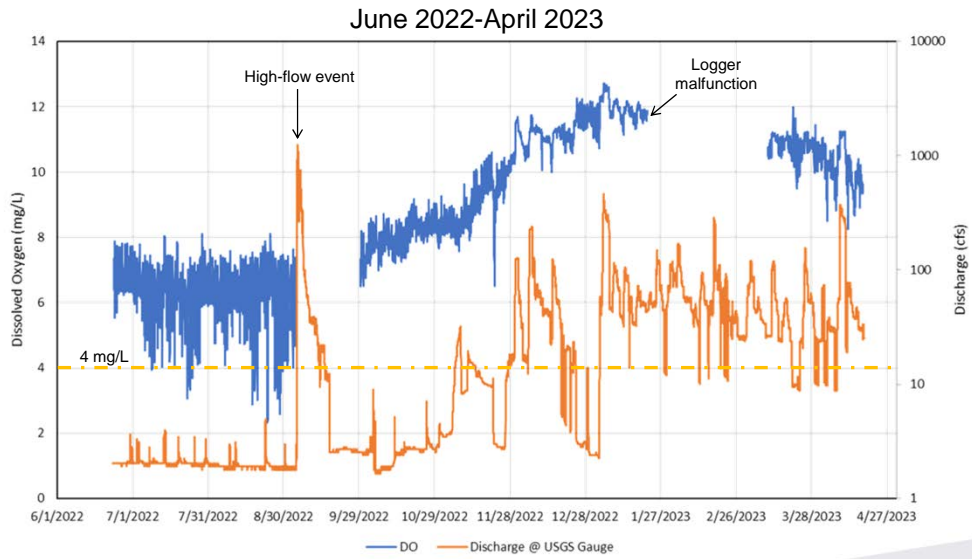


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Preliminary Results – Continuous Monitoring in Heath Creek

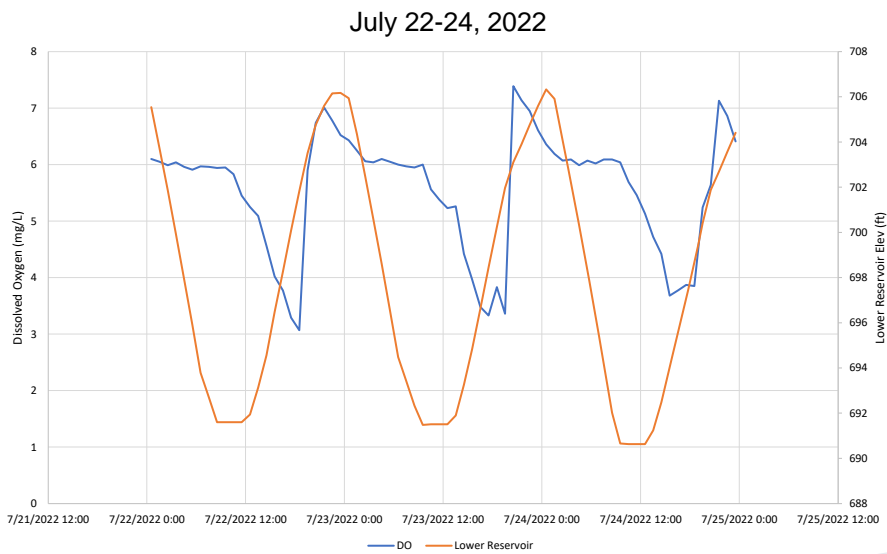


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Preliminary Results – Continuous Monitoring in Heath Creek



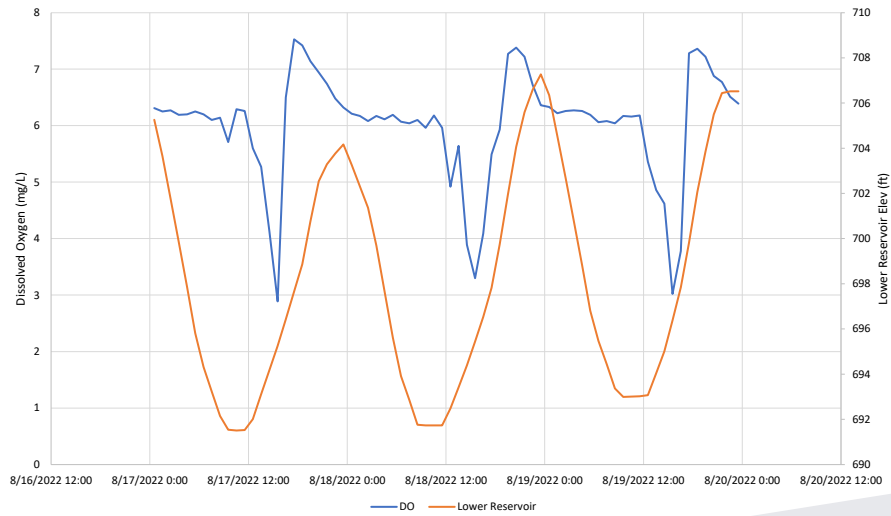
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Preliminary Results – Continuous Monitoring in Heath Creek

August 17-19, 2022



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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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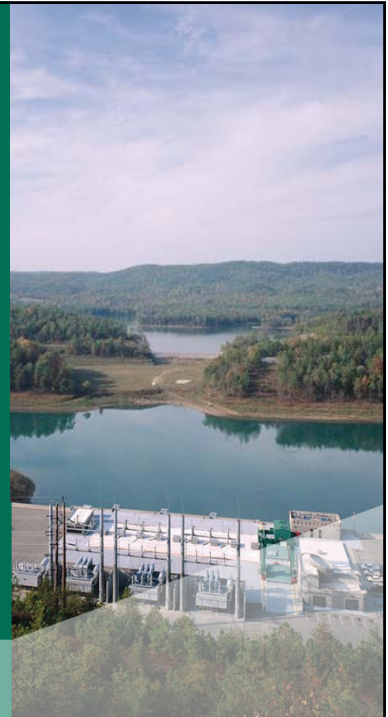
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Questions and Discussion

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Aquatic Resources Study



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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

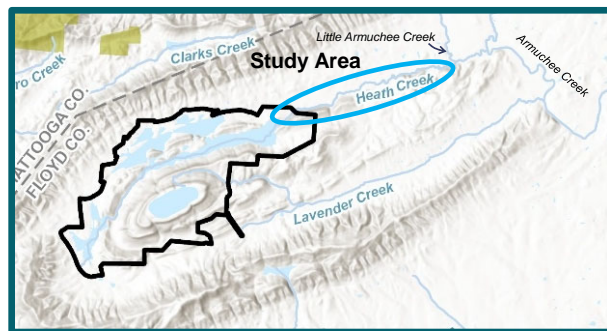
10/26/2023

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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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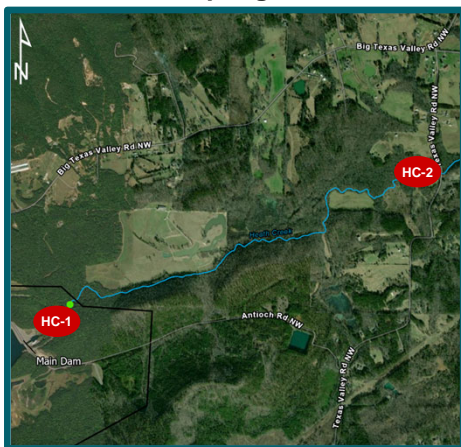
Methods

- ▶ 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

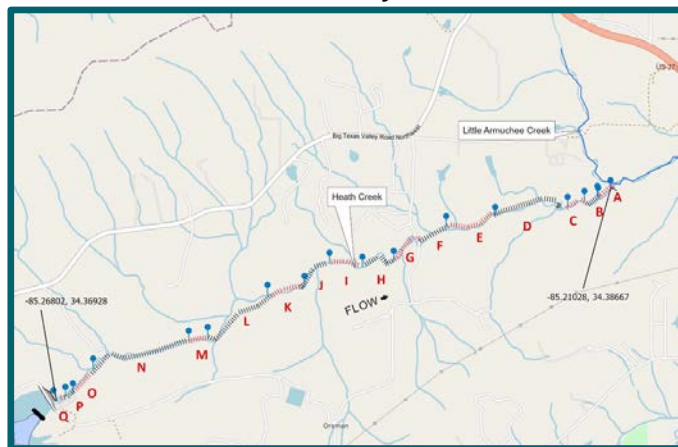


Sampling Areas

Fish Sampling Stations



Mussel Survey Reach



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
<i>Villosa vibex</i>	Southern Rainbow	93	63.3	26	1
<i>Leaunio lienosa</i> (<i>Villosa lienosa</i>)	Little Spectaclecase	53	36.1	258	4
<i>Cambarunio nebulosus</i> (<i>Villosa nebulosa</i>)	Alabama Rainbow	1	0.7	1	--
<i>Utterbackia imbecillis</i>	Paper Pondshell	--	--	2	--
Total		147			

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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

10/26/2023

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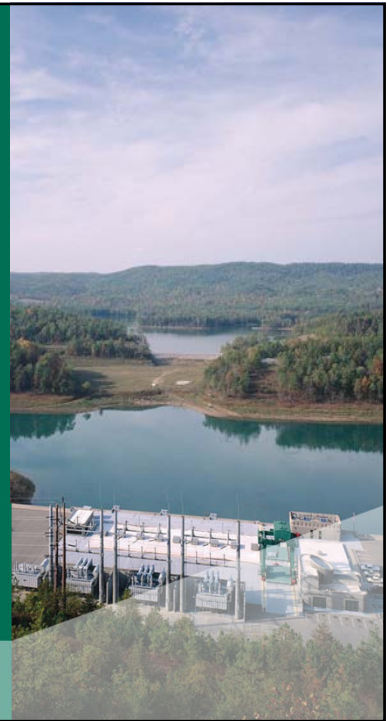
Questions and Discussion

28

Trispot Darter Survey



Source: GDNR Biodiversity Portal; photo by Dave Neely



29

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

30

Study Area

- ▶ Seepage area/pond below Dam A
- ▶ Channel A from Dam A to confluence with Heath Creek
- ▶ Other small tributaries and seepage areas



10/26/2023

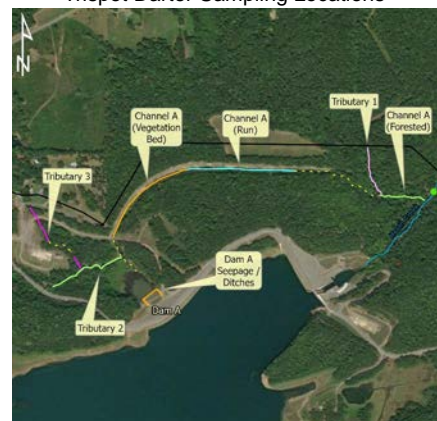
31

31

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

Trispot Darter Sampling Locations



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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

10/26/2023

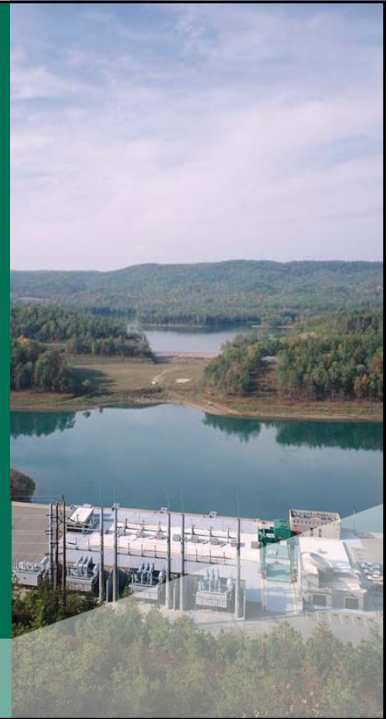
33

33

Questions and Discussion

34

Terrestrial and Wetland Resources Survey



35

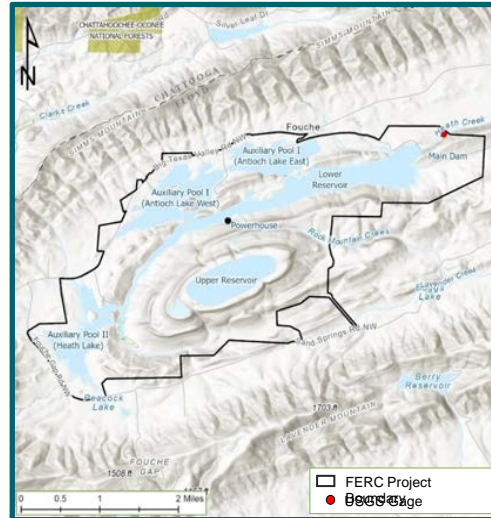
Study Objectives

- ▶ 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

36

Study Area

- ▶ Project boundary around the Lower and Upper Reservoirs, the Auxiliary Pools, and Heath Creek



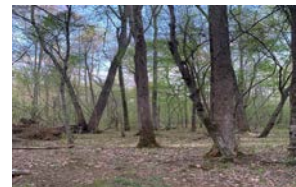
10/26/2023

37

37

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



10/26/2023

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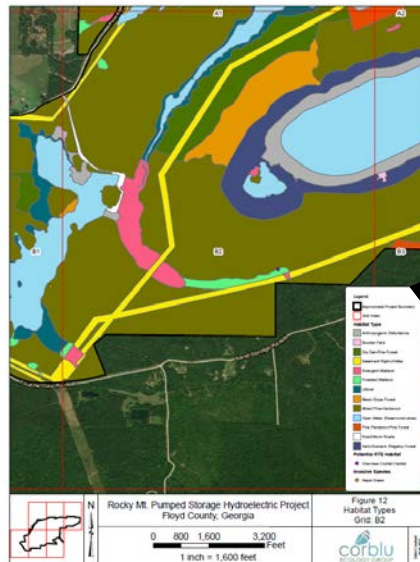
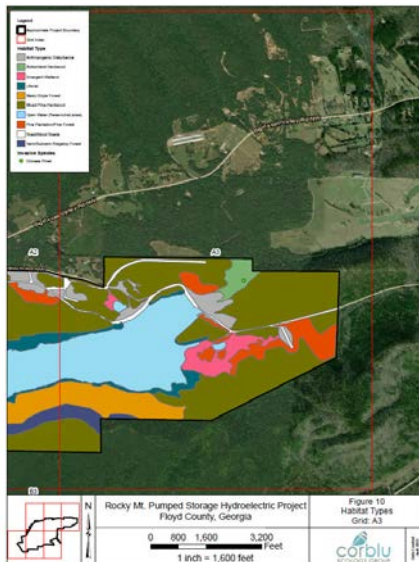
Terrestrial and Wetland Preliminary Findings

- ▶ 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)



Eric Frommer, CC BY-SA 2.0

Vegetation Community Mapping - Examples



- Legend**
- Approximate Project Boundary
 - Grid Index
 - Habitat Type**
 - Anthropogenic Disturbance
 - Boulder Field
 - Dry Oak-Pine Forest
 - Case ment Right-of-Way
 - Emergent Wetland
 - Forested Wetland
 - Littoral
 - Mesic Slope Forest
 - Mixed Pine-Hardwood
 - Open Water (Reservoirs/Lakes)
 - Pine Plantations/Pine Forest
 - Road/Wood Roads
 - Xeric/Subseric Ridge-top Forest
 - Potential RTE Habitat**
 - Cherokee Clubtail Habitat
 - Invasive Species**
 - Nepal Grass

Questions and Discussion

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

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.

From: [@Rocky Relicensing](#)
To: [@Rocky Relicensing](#)
Cc: [McCaslin, Tyler](#); [Jones, Craig](#); [Barrows, Christina](#); [Steven Layman](#); [Kelly Kirven](#)
Subject: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application
Date: Friday, November 17, 2023 10:01:51 AM
Attachments: [image001.png](#)

Some people who received this message don't often get email from rockyrelicensing@opc.com. [Learn why this is important](#)

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 has electronically filed with the Federal Energy Regulatory Commission a staff review copy of the Draft License Application for New License (DLA) for the relicensing of the Rocky Mountain Project. The original license expires December 31, 2026.

OPC has prepared this DLA according to the requirements of the Commission's regulations under the Traditional Licensing Process (TLP), which FERC approved for use by OPC on January 26, 2022.

OPC is providing electronic copies of the DLA to relevant resource agencies, tribes, non-governmental organizations, and other potentially interested parties for review and written comment. In accordance with 18 C.F.R. §16.8 (c)(5), written comments on the DLA are due within 90 days of the date of this filing (comments due February 15, 2024). Please direct comments on the content of the DLA to:

ATTN: Dr. Craig A. Jones
Vice President, EHS & Regulatory Affairs
Relicensing Project Manager
Craig.Jones@opc.com

The DLA will be available at FERC's eLibrary: <https://elibrary.ferc.gov/eLibrary/search> (reference docket number P-2725) and on the Rocky Mountain Project's relicensing website at <https://opc.com/rockymountainrelicensing/>. Additional electronic copies of the DLA are also available by request to Craig Jones at the email address below. Hard copies of the filing are available for inspection at OPC's Headquarters in Tucker, Georgia and may be mailed by request.

This filing consists of the following components:

- Initial Statement
- Exhibit A – Project Description
- Exhibit B – Project Operations
- Exhibit C – Construction History
- Exhibit D – Statement of Cost and Financing
- Exhibit E – Environmental Report (*Archaeological Report and Protected Species Occurrence Map filed as Privileged*)
- Exhibit F – General Design Information (*CEII*)
- Exhibit G – Project Boundary Maps
- Exhibit H – Miscellaneous Filing Material

Due to the sensitive nature of the information contained in the Archaeological Report (included in Exhibit E), this report was filed as privileged and is only being provided to the FERC, State and Tribal Historic Preservation Officers, and the Bureau of Indian Affairs. In addition, due to the sensitive nature of the information contained in the Protected Species Occurrence Map included in the Terrestrial and Wetlands Resources Survey Study Report, this information is only being provided to FERC, the Georgia Department of Natural Resources, and the US Fish and Wildlife Service. The information contained in

Exhibit F qualifies as Critical Energy Infrastructure Information (CEII) as defined in §388.113(c) and has been removed from the public version of the DLA.

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

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: [@Rocky Relicensing](#)
To: er@dca.ga.gov
Cc: jennifer.dixon@dca.ga.gov; Stacy.Rieke@dca.ga.gov; Olivia.Kendrick@dca.ga.gov; [McCaslin, Tyler](#); [Jones, Craig](#); [Barrows, Christina](#); [Steven Layman](#); [Kelly Kirven](#); [McCaslin, Tyler](#)
Subject: HP-201119-004 - Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Archeological Report
Date: Friday, November 17, 2023 10:07:19 AM
Attachments: [image002.png](#)
[Exhibit E - Appendix C - Study Reports privileged - Archeological Report.pdf](#)

Some people who received this message don't often get email from rockyrelicensing@opc.com. [Learn why this is important](#)

Hi everyone,

To follow up on the previous email announcing the availability of the Draft License Application for Rocky Mountain Pumped Storage Hydroelectric Project (P-2725), attached is the privileged Archeological Report from the FERC filing for Project Number HP-201119-004.

The remainder of the Draft License Application is available on our [relicensing website](#).

Please let me know if you have any questions or need any additional information.

Christina Barrows

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084
Office: 770-270-7996
Cell: 470-791-4355
Email: christina.barrows@opc.com **Web:** www.opc.com



From: [@Rocky Relicensing](#)
To: [Bauer, Eric F](#); [John_Doresky@fws.gov](#); [Peter Maholland](#)
Cc: [Steven Layman](#); [Kelly Kirven](#); [McCaslin, Tyler](#); [Jones, Craig](#); [Barrows, Christina](#)
Subject: RE: [EXTERNAL] Rocky Mountain DLA Submittal
Date: Friday, November 17, 2023 10:12:22 AM
Attachments: [image001.png](#)
[image003.png](#)
[Exhibit E - Appendix C - Study Reports privileged - Terrestrial and Wetlands Report.pdf](#)

Some people who received this message don't often get email from rockyrelicensing@opc.com. [Learn why this is important](#)

Hi everyone,

Attached is Exhibit E – Appendix C including the Terrestrial and Wetlands Report marked as privileged in the FERC filing and unavailable publicly.

The remainder of the Draft License Application is available on our [relicensing website](#).

Please let me know if you have any questions or need any additional information. We are looking forward to meeting with you soon.

Christina Barrows

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084
Office: 770-270-7996
Cell: 470-791-4355
Email: christina.barrows@opc.com Web: www.opc.com



From: Bauer, Eric F <eric_bauer@fws.gov>
Sent: Thursday, November 16, 2023 3:08 PM
To: Jones, Craig <craig.jones@opc.com>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>
Subject: Re: [EXTERNAL] Rocky Mountain DLA Submittal

External E-Mail

Thanks for the heads up Craig.

-Eric

Eric Bauer (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
Athens, GA 30601
Office: 706-535-2103

Teams: eric_bauer@fws.gov (preferred)

<http://www.fws.gov/athens>

Follow us on Facebook! <https://www.facebook.com/GeorgiaFieldOffice>

From: Jones, Craig <craig.jones@opc.com>
Sent: Thursday, November 16, 2023 3:07 PM
To: Bauer, Eric F <eric_bauer@fws.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>
Subject: [EXTERNAL] Rocky Mountain DLA Submittal

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

Good Afternoon Eric,

I'm reaching out to give you a heads up that we will be submitting the Rocky Mountain DLA tomorrow. You will be receiving an email notification with links to the documents.

The comment period will run through February 15, 2024. However, please let me know if a meeting to discuss study results would be helpful to you, and we'll be happy to set something up.

Please feel free to reach out with any questions about the filing.

Best,

Craig

Craig A. Jones, PhD

Vice President, EHS & Regulatory Affairs
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: [@Rocky Relicensing](#)
To: ["Hakala, Jim"](#); ["Peacock, Clint"](#); [Escobar, Anakela](#); ["Gregory, David"](#)
Cc: [Steven Layman](#); [Kelly Kirven](#); [McCaslin, Tyler](#); [Barrows, Christina](#); [Jones, Craig](#)
Subject: RE: Rocky Mountain DLA Submittal
Date: Friday, November 17, 2023 10:15:33 AM
Attachments: [image001.png](#)
[image003.png](#)
[Exhibit E - Appendix C - Study Reports privileged - Terrestrial and Wetlands Report.pdf](#)

Some people who received this message don't often get email from rockyrelicensing@opc.com. [Learn why this is important](#)

Hi everyone,

Attached is Exhibit E – Appendix C including the Terrestrial and Wetlands Report marked as privileged in the FERC filing and unavailable publicly.

The remainder of the Draft License Application is available on our [relicensing website](#).

Please let me know if you have any questions or need any additional information. We are looking forward to meeting with you soon.

Christina Barrows

Environmental Specialist
Oglethorpe Power Corporation
2100 East Exchange Place, Tucker, GA 30084
Office: 770-270-7996
Cell: 470-791-4355
Email: christina.barrows@opc.com Web: www.opc.com



From: Jones, Craig <craig.jones@opc.com>
Sent: Thursday, November 16, 2023 2:52 PM
To: 'Hakala, Jim' <Jim.Hakala@dnr.ga.gov>; 'Peacock, Clint' <Clint.Peacock@dnr.ga.gov>; Escobar, Anakela <anakela.escobar@dnr.ga.gov>; 'Gregory, David' <David.Gregory@dnr.ga.gov>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>
Subject: Rocky Mountain DLA Submittal

Good Afternoon Everyone,

I'm reaching out to give you a heads up that we will be submitting the Rocky Mountain DLA tomorrow. You will be receiving an email notification with links to the documents.

The comment period will run through February 15, 2024. However, as discussed in October, we will be reaching out in the near future to schedule a meeting to discuss the DLA, including study results and proposed PM&E measures.

Please feel free to reach out with any questions.

Best,

Craig

Craig A. Jones, PhD

Vice President, EHS & Regulatory Affairs
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: [@Rocky Relicensing](#)
To: [@Rocky Relicensing](#)
Cc: [McCaslin, Tyler](#); [Jones, Craig](#); [Barrows, Christina](#); [Steven Layman](#); [Kelly Kirven](#)
Subject: Oglethorpe Power Corporation - Rocky Mountain Pumped Storage Hydroelectric Project - Archeological Report
Date: Friday, November 17, 2023 10:52:08 AM
Attachments: [image001.png](#)
[Exhibit E - Appendix C - Study Reports privileged - Archeological Report.pdf](#)

Some people who received this message don't often get email from rockyrelicensing@opc.com. [Learn why this is important](#)

To follow up on the previous email announcing the availability of the Draft License Application for Rocky Mountain Pumped Storage Hydroelectric Project (P-2725), attached is the privileged Archeological Report from the FERC filing.

The remainder of the Draft License Application is available on our [relicensing website](#).

Please let me know if you have any questions or need any additional information.

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: [Acee Watt](#)
To: [McCaslin, Tyler](#)
Cc: [Jones, Craig](#); [Steven Layman](#); [Kelly Kirven](#); [Barrows, Christina](#)
Subject: RE: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application
Date: Friday, November 17, 2023 12:05:12 PM
Attachments: [image003.png](#)

Some people who received this message don't often get email from awatt@ukb-nsn.gov. [Learn why this is important](#)

This should be adequate thank you!

Have a great Friday and weekend.

Acee Watt (he/him)
Tribal Historic Preservation Officer
Office of Historic Preservation
918.871.2852
awatt@ukb-nsn.gov
ukbthpo@ukb-nsn.gov



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From: McCaslin, Tyler <tyler.mccaslin@opc.com>
Sent: Friday, November 17, 2023 10:26 AM
To: Acee Watt <awatt@ukb-nsn.gov>
Cc: Jones, Craig <craig.jones@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>; Barrows, Christina <christina.barrows@opc.com>
Subject: RE: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application

Hi Mr. Watt,

The file size is too large to email for Exhibit E as well as Exhibit E Appendix A – Consultation Record. Below are two direct links to each of the .PDF files of these documents.

Would you prefer a hard copy by mail?

<http://opc.com/wp-content/uploads/2023/11/Exhibit-E-Package.pdf>

http://opc.com/wp-content/uploads/2023/11/Exhibit-E-Appendix-A_Consultation-Record.pdf

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: Friday, November 17, 2023 10:46 AM
To: McCaslin, Tyler <tyler.mccaslin@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>; Barrows, Christina <christina.barrows@opc.com>
Subject: Fwd: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application

Tyler/Christina, Can one of you reply to Acee and provide a standalone Exhibit E?

Sent from my iPhone. Please pardon the typos.

Begin forwarded message:

From: Acee Watt <awatt@ukb-nsn.gov>
Date: November 17, 2023 at 10:41:55 AM EST
To: "Jones, Craig" <craig.jones@opc.com>
Subject: RE: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application

External E-Mail

Good morning Mr. James,

Would you be able to provide me a copy of Exhibit E for review? Thank you.

All the best,

Acee Watt (he/him)
Tribal Historic Preservation Officer
Office of Historic Preservation
918.871.2852
awatt@ukb-nsn.gov
ukbthpo@ukb-nsn.gov



This communication is confidential | Destroy if received in error and please let me know | Unauthorized use, copying or distribution is prohibited.

From: Joe Bunch <jbunch@ukb-nsn.gov>
Sent: Friday, November 17, 2023 9:37 AM
To: Acee Watt <awatt@ukb-nsn.gov>
Subject: FW: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application

fyi

From: @Rocky Relicensing <RockyRelicensing@opc.com>
Sent: Friday, November 17, 2023 9:02 AM
To: @Rocky Relicensing <RockyRelicensing@opc.com>
Cc: McCaslin, Tyler <tyler.mccaslin@opc.com>; Jones, Craig <craig.jones@opc.com>; Barrows, Christina <christina.barrows@opc.com>; Klein Schmidt Group (Steven Layman) <Steven.Layman@Kleinschmidtgroup.com>; Klein Schmidt Group (Kelly Kirven) <Kelly.Kirven@KleinschmidtGroup.com>
Subject: Rocky Mountain Pumped Storage Hydroelectric Project (P-2725) – Oglethorpe Power Corporation – Draft License Application

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), co-licensee for the existing Rocky Mountain Pumped Storage Hydroelectric Project, FERC No. 2725 has electronically filed with the Federal Energy Regulatory Commission a staff review copy of the Draft License Application for New License (DLA) for the relicensing of the Rocky Mountain Project. The original license expires December 31, 2026.

OPC has prepared this DLA according to the requirements of the Commission's regulations under the Traditional Licensing Process (TLP), which FERC approved for use by OPC on January 26, 2022.

OPC is providing electronic copies of the DLA to relevant resource agencies, tribes, non-governmental organizations, and other potentially interested parties for review and written comment. In accordance with 18 C.F.R. §16.8 (c)(5), written comments on the DLA are due within 90 days of the date of this filing (comments due February 15, 2024). Please direct comments on the content of the DLA to:

ATTN: Dr. Craig A. Jones
Vice President, EHS & Regulatory Affairs
Relicensing Project Manager
Craig.Jones@opc.com

The DLA will be available at FERC's eLibrary: <https://elibrary.ferc.gov/eLibrary/search> (reference docket number P-2725) and on the Rocky Mountain Project's relicensing website at <https://opc.com/rockymountainrelicensing/>. Additional electronic copies of the DLA are also available by request to Craig Jones at the email address below. Hard copies of the filing are available for inspection at OPC's Headquarters in Tucker, Georgia and may be mailed by request.

This filing consists of the following components:

1. Initial Statement
2. Exhibit A – Project Description
3. Exhibit B – Project Operations
4. Exhibit C – Construction History
5. Exhibit D – Statement of Cost and Financing
6. Exhibit E – Environmental Report (*Archaeological Report and Protected Species Occurrence Map*)

filed as Privileged)

7. Exhibit F – General Design Information (CEII)
8. Exhibit G – Project Boundary Maps
9. Exhibit H – Miscellaneous Filing Material

Due to the sensitive nature of the information contained in the Archaeological Report (included in Exhibit E), this report was filed as privileged and is only being provided to the FERC, State and Tribal Historic Preservation Officers, and the Bureau of Indian Affairs. In addition, due to the sensitive nature of the information contained in the Protected Species Occurrence Map included in the Terrestrial and Wetlands Resources Survey Study Report, this information is only being provided to FERC, the Georgia Department of Natural Resources, and the US Fish and Wildlife Service. The information contained in Exhibit F qualifies as Critical Energy Infrastructure Information (CEII) as defined in §388.113(c) and has been removed from the public version of the DLA.

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

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