November 27, 2024

VIA E-FILING

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Response to Additional Information Request for the Saluda Hydroelectric Project
Saluda Hydroelectric Project (FERC No. P-516-459)

Dear Secretary Reese:

On behalf of Dominion Energy South Carolina, Inc. (DESC), licensee for the Saluda Hydroelectric Project (Project; FERC No. 516), we herein file a response to the Federal Energy Regulatory Commission's (FERC or Commission) September 30, 2024 Request for Additional Information. Attachment A provides a detailed list of each item from FERC's Appendix A: Request for Additional Information, accompanied by DESC's responses. Revised project boundary data, in a geo-referenced electronic format, is being submitted separately in conjunction with this filing.

Please direct any questions pertaining to this filing to Ray Ammarell, Project Manager for DESC, at Raymond.Ammarell@dominionenergy.com.

Sincerely,

KLEINSCHMIDT ASSOCIATES

Alison Jakupca
Project Manager

ACJ:TMJ
Attachments: Attachment A – Response to Additional Information Request

ATTACHMENT A

RESPONSE TO ADDITIONAL INFORMATION REQUEST

RESPONSE TO SEPTEMBER 30, 2024 ADDITIONAL INFORMATION REQUEST

SALUDA HYDROELECTRIC PROJECT

FERC NO. 516

This document provides additional information, as requested by Federal Energy Regulatory Commission (FERC) staff within their September 30, 2024 letter. For clarity and ease of review, responses are provided under each sub-heading below.

Exhibit E

Threatened and Endangered Species

1. ***If the information is readily available, please provide the following information for the endangered red-cockaded woodpecker, the threatened Wood Stork, the endangered Carolina Heelsplitter, the endangered Canby's Dropwort, the endangered Harperella, the endangered Rough-leaved Loosestrife, and the threatened Smooth Coneflower: (1) any records or observations of these species at or near the project; (2) descriptions of the habitats found at the project and the potential for these habitats to support these species; and (3) a description of the effects of project operation and maintenance activities on these species and their preferred habitats at the project.***

DESC Response:

Red-cockaded Woodpecker (*Picoides* [*Dryobates*] *borealis*)

The Red-cockaded Woodpecker is a federally listed endangered species, with a proposed downlisting to threatened (USFWS 2024a) that was historically common in mature pine forest throughout the southeastern United States. The current range for the Red-cockaded Woodpecker is reduced due to loss of habitat (i.e., large expenses of open mature pine forests) and habitat fragmentation, where suitable habitats are too small and/or disjunct. This species needs large expanses of mature, open pine forests, particularly longleaf, slash, and loblolly pine, many of which are maintained by fire (GDNR 2019a). Nests and roost cavities are selected in large pines, which are often infected with red heart fungus. Diet primarily consists of ants, wood roaches, wood-boring beetles, and many other invertebrates found on or within pine bark.

Potential Occurrence and Habitat Range

The majority of the Saluda Hydroelectric Project (Saluda Project or Project) is located within the range of the Red-cockaded Woodpecker (USFWS 2024a). Lake Murray and other aquatic habitats comprise the majority of areal coverage of the Project boundary. Terrestrial habitats are mostly limited to shorelines and areas in the western portions on the Project boundary along the historic floodplains of the Saluda River, Little Saluda River, and Big Creek. In these western areas along the historic floodplain elevations, some terrestrial habitats are currently actively managed pine plantation. However, these active pine plantations are privately owned. Habitat suitability studies have not been conducted by Dominion Energy South Carolina, Inc. (DESC or Licensee) on these lands, and occurrences within the Project vicinity are not known.

Potential Project Effects from Operations and Maintenance Activities

The majority of terrestrials lands within the Saluda Project boundary are privately owned. As such, DESC has little control over activities such as silvicultural practices, logging, or other land-clearing activities taking place in these privately owned pine plantations. However, if tree-clearing activities are to take place on DESC-owned property, DESC will follow appropriate steps to evaluate habitats for protected species, including Red-cockaded Woodpecker, before clearing takes place. Appropriate federal and state agencies will be consulted for any work conducted in mature, open, pine stands that contain potentially suitable habitat for Red-cockaded Woodpeckers. Red-cockaded Woodpecker is not expected to be affected by Project operations or maintenance.

Wood Stork (*Mycteria americana*)

Wood Stork is a federally listed threatened species whose breeding range in the southeastern United States includes Florida, Georgia, South Carolina, and North Carolina. Wood Stork generally heavily use coastal marshes but can be found in the Piedmont regions using a variety of freshwater and estuarine wetlands for breeding, feeding, and roosting (GDNR 2019b). The species will use standing water, deepwater ponds with islands, constructed impoundments, fluctuating wetlands, marshes, and periodically inundated herbaceous wetlands.

Loss of habitats through draining or filling wetlands is the primary threat to Wood Stork populations (GDNR 2019b). Although the species uses a variety of wetlands (deep water for nesting, shallow water for foraging), wetland loss or drying through landscape

modifications or fluctuations in rainfall make Wood Storks particularly vulnerable in these habitats.

Potential Occurrence and Habitat Range

Wood Storks have been observed feeding at various locations in the upstream-end of Lake Murray (i.e., the western portions of the Saluda Project area) between 2001 and 2006. These storks were found periodically foraging in the upper reaches of Lake Murray, the Saluda River, and adjacent wetlands during the late summer and early fall. No nesting colonies were observed. The timing and location of Wood Stork observations suggests these individuals were "post-dispersal migrants" that were likely hatched in the coastal areas during summer months and migrated to the Lake Murray area to utilize seasonal/temporary food sources before returning to coastal areas in the winter.

Potential Project Effects from Operations and Maintenance Activities

The existing operation of the Saluda Project provides marsh-like wetland conditions along the mouth of the Saluda River as it enters Lake Murray, which Wood Storks have been documented to use. Although, maintenance activities and Project operations are not anticipated to adversely affect Wood Stork, DESC has proposed several measures surrounding public education and awareness of this species in consultation with resource agencies for the new license term. This includes the implementation of a Rare, Threatened, and Endangered Species Public Awareness Program, which will include information on Wood Stork identification, habitat requirements, and natural history, as well as a mechanism to report any storks observed in the Project vicinity. Additionally, DESC will coordinate annually with SCDNR and USFWS to determine whether Wood Storks were observed in the Lake Murray Vicinity during routine resource agency bald eagle surveys on the reservoir. DESC will notify the USFWS and the SCDNR in the event that Wood Storks are sighted on Lake Murray.

Carolina Heelsplitter (*Lasmigona decorate*)

The Carolina Heelsplitter is a federally listed endangered species known historically from Catawba, Pee Dee, and Savannah River basins in North Carolina and South Carolina with a possibility that the Carolina Heelsplitter was historically found in the Saluda River Basin in South Carolina (USFWS 2024b). As of 2002, six critical habitat units were designated for the species – one in North Carolina and five in South Carolina. However, the most recent 5-year review was published in 2012 and indicated 11 known surviving populations of Carolina Heelsplitter, which includes only 152 individuals (USFWS 2012). The nearest

South Carolina population is in Turkey Creek (Savannah River Basin) and its tributaries in Edgefield and McCormick counties (USFWS 2012). There were two individuals discovered in Cuffytown Creek (Savannah River Basin) in 2010 (USFWS 2012). Carolina Heelsplitter is usually found in mud, muddy sand, or muddy gravel substrates along well-shaded and stable streambanks but can also be found in clean substrates of sand, gravel, and cobble (USFWS 2024b). Trials were conducted on one individual Carolina Heelsplitter from both the Yadkin-Pee Dee River Basin and Catawba River Basin to determine the required fish host for the species (Eads et al. 2010). This study determined that several species of minnows (Cyprinidae) from both basins served as hosts for the endangered mussel and some sunfish species (Centrarchidae) supported transformation of a few juveniles; however, differences in transformation success were observed between the two basins for this species (Eads et al. 2010).

The primary factors threatening the Carolina Heelsplitter include habitat degradation resulting from impoundments and stream channelization projects, degrading streambank conditions, and sedimentation, as well as poor water quality resulting from point and non-point source pollution. (USFWS 1993).

Potential Occurrence and Habitat Range

Although the historic range of Carolina Heelsplitter may have included the Saluda River drainages, there are no known historic or recent records of the species occurring in the basin. Also, the aquatic habitats within the Project boundary are predominantly in impounded conditions, further reducing the likelihood of Carolina Heelsplitter being present in the Project area. Considering these factors, it is unlikely that this species is present within the Saluda Project area.

Potential Project Effects from Operations and Maintenance Activities

Because the species is unlikely to occur in the Project area and there are no known occurrences within the Saluda River drainage basin, Carolina Heelsplitter is not expected to be affected by Project operations or maintenance. As proposed through the Comprehensive Relicensing Settlement Agreement (CRSA), DESC would coordinate the formation of a Saluda Hydro Freshwater Mussel Working Group to provide technical expertise and guidance for mussel monitoring during the new license term. Potential participants would include representatives from state and federal resource agencies, such as USFWS and SCDNR, as well as academic and other regional mussel experts. This group would meet annually through the license term to review relevant data, evaluate the effectiveness of mussel monitoring activities and restoration efforts and establish goals

and objectives for future years. Monitoring activities would take place in accordance with the Lower Saluda River Freshwater Mussel Adaptive Monitoring and Enhancement Program filed as part of the CRSA.

Canby's Dropwort (*Oxypolis canbyi*)

Canby's Dropwort is a federally listed endangered species that generally occurs in the coastal plain regions of Georgia and the Carolinas, as well as Maryland and Delaware (USFWS 2024c). The species occurs in moist areas with acidic, organic soils and fluctuating water levels such as cypress ponds and sloughs, Carolina bays, and wet savannas. Generally, the areas have patchy or no canopy cover (GDNR 2020a).

The factors threatening Canby's Dropwort are primarily the loss of wetland habitats attributed to land conversion, wetland ditching, draining, or filling, fire suppression in wetlands habitats and surrounding woodlands, and lowering of the water table by groundwater withdrawal.

Potential Occurrence and Habitat Range

The potential range of Canby's Dropwort includes the Atlantic coastal plan from North Carolina to Georgia, as well as the Chesapeake Bay area. This potential range extends into the northeastern corner of the Saluda Project area in Richland County. However, the Project is located above the Fall Line and is not located within the coastal plain ecoregion. Further, the terrestrial habitats within the northeastern portion of the Project area are generally residential developments along the lake shore and mixed pine-hardwood upland forests. Although habitat suitability surveys have not occurred in these areas, the potential for Canby's Dropwort to occur within the Project area is unlikely. There are no known records or observations of this species at the Project.

Potential Project Effects from Operations and Maintenance Activities

The majority of terrestrials lands within the Project boundary are privately owned. However, DESC will follow appropriate steps to evaluate habitats for Canby's Dropwort if potential work or maintenance was to occur within areas containing wetlands, cypress sloughs, or other potentially suitable habitats on DESC-owned lands. Appropriate federal and state agencies will be consulted for any work conducted in these habitats. Canby's Dropwort is not expected to be affected by Saluda Project operations or maintenance.

Harperella (*Ptilimnium nodosum*)

Harperella is a federally listed endangered species that has a patchy distribution with occurrences in Alabama, Georgia, South Carolina, North Carolina, Virginia, West Virginia, and Arkansas (USFWS 2024d). Harperella occurs in cypress ponds, seeps along granite outcrops, and flooded margins of rocky streams (GDNR 2020b). In South Carolina, the plant can additionally be found in Carolina Bays or fluctuating boggy ponds in the coastal plain.

Threats to the species include alterations to the landscape to make land more suitable for agriculture, silviculture, or wildlife watering, as well as runoff of pollutants and sediments, disturbances from all-terrain vehicles, foot traffic, heavy equipment, and debris build-up (GDNR 2020b). Currently, the ditching and draining and other disturbances of Carolina Bays, particularly those that alter the natural fluctuations in water levels, are the species' greatest threat in South Carolina.

Potential Occurrence and Habitat Range

The range of Harperella includes the western portion of the Saluda Project boundary in Saluda County. The majority of terrestrials lands within the Project boundary are privately owned, and habitat suitability studies or targeted surveys for Harperella have not occurred on these lands. There are no known records or observations of this species at the Project.

Potential Project Effects from Operations and Maintenance Activities

As previously stated, the majority of terrestrial habitats within the Project boundary are privately owned. Further, DESC-owned property in the expected range of Harperella is unlikely to contain seeps along granite outcrop or cypress ponds that provide suitable habitat conditions. As such, Harperella is not expected to be adversely affected with the relicensing of the Saluda Project.

Rough-leaved Loosestrife (*Lysimachia aperulaefolia*)

Rough-leaved Loosestrife is endemic to the coastal plains and sandhills of North Carolina and South Carolina. Populations are known from several North Carolina counties, but only one extant population in South Carolina is known (USFWS 2024e). Although historic populations occurred in Darlington County, the only known South Carolina population occurs at the Fort Jackson Army Training Center in Richland County.

Rough-leaved Loosestrife generally occurs in the edges between longleaf pine uplands and pond pine areas with dense shrub and vine growth, usually on wet, peaty, and poorly drained soils, seasonally saturated sands, and shallow organic soils over wet sand. The species can also occur in large Carolina bays, in deep peat in the low shrub communities (USFWS 2024e).

The habitat where Rough-leaved Loosestrife is found is often maintained by fire. Suppression of naturally occurring fire in the pine ecotones has allowed the shrub layer to increase in stem density and height, ultimately eliminating the edge habitat and openings that this species requires. Some remaining populations can be found on roadsides or powerline rights-of-way, where regular maintenance mimics fire disturbance (USFWS 2024e).

Potential Occurrence and Habitat Range

Although no targeted surveys for Rough-leaved Loosestrife have occurred, there is a known extant population of the species in South Carolina that is limited to the Fort Jackson Army Training Center. Although the species' range includes Richland County (i.e., the northeastern corner of the Saluda Project boundary, the habitat conditions are not reflective of the conditions observed at the known population at Fort Jackson (e.g., longleaf pine uplands that are adjacent to wet, sandy soils). As a result, the potential occurrence of this species within the Project boundary is unlikely.

Potential Project Effects from Operations and Maintenance Activities

As previously stated, the species' occurrence is unlikely within the Saluda Project boundary, and measures proposed for the operation and maintenance of the Saluda Project through the new license term are not anticipated to impact this species.

Smooth Coneflower (*Echinacea laevigata*)

The Smooth Coneflower (or Smooth Purple Coneflower) is a federally listed endangered species that is currently known to occur from South Carolina, North Carolina, Georgia, and Virginia. Smooth Coneflower historically occurred in prairies and savannas maintained by fire and large animal grazing and browsing. Now these openings are primarily managed with prescribed fires. Suitable habitats for Smooth Coneflower included grassy openings and rocky glades with shallow soil over mafic bedrock and sunny roadsides or rights-of-way through these habitats (GDNR 2020c). Threats to the species include destruction of habitats by conversion of lands to pine plantations, developments, fire suppression, and

use of herbicides in rights-of-way, encroachments of invasive species, and collection/poaching (USFWS 2024f).

Potential Occurrence and Habitat Range

The potential range of Smooth Coneflower extends into the northeastern corner of the Saluda Project area in Richland County. The majority of terrestrial habitats in the Project boundary are privately owned, and DESC has not conducted targeted surveys for Smooth Coneflower or assessed potential habitats for suitability or presence of species that often occur alongside Smooth Coneflower, such as rattlesnake-master, post oak, blackjack oak, shortleaf pine, and various Helianthus sunflowers. There are no known records or observations of this species at the Project.

Potential Project Effects from Operations and Maintenance Activities

The majority of terrestrials lands within the Saluda Project boundary are privately owned. However, DESC will follow appropriate steps to evaluate habitats for Smooth Coneflower if potential work or maintenance was to occur within areas containing potentially suitable habitats on DESC-owned lands. Appropriate federal and state agencies will be consulted for any work conducted in these habitats. Smooth Coneflower is not expected to be affected by Project operations or maintenance.

2. ***The Monarch Butterfly is a candidate species for listing under the Endangered Species Act (ESA). If the information is readily available, please provide: (1) any records or observations of this species at or near the project; (2) confirmation of milkweed or nectar-bearing flowers at the project; and (3) a description of maintenance actions (e.g., routine mowing or pesticide application) that may affect Monarch Butterfly forage or habitat at the project.***

DESC Response:

The native range of the Monarch Butterfly has historically been in North and South America, but the butterfly has since spread to areas where milkweed and suitable temperatures exist, including Australia, New Zealand, and portions of the Iberian Peninsula (USFWS 2024g). Flowering plants are needed for suitable habitat for the Monarch Butterfly, specifically milkweed plants, such as common milkweed (USFS 2023), which thrive in disturbed areas that receive ample sunlight, such as agricultural areas and roadsides.

During the winter, Monarch butterflies take refuge in oyamel fir tree roosts located in mountainous regions in central Mexico (USFWS 2024g). Monarchs can be found throughout grassland, tundra, coastal, mountain, urban, rural, and wetland areas. Monarch butterflies require healthy milkweed for laying eggs on and as a food source for larvae or caterpillars. The primary factors threatening the Monarch Butterfly include the loss and degradation of habitat through agriculture, pesticides, logging, herbicides, exposure to insecticides, and climate change effects (USFWS 2020).

Potential Occurrence and Habitat Range

The entirety of the Saluda Project is located within the range of Monarch Butterfly, and potentially suitable habitat is scattered throughout terrestrial portions of the Project boundary. However, the majority of terrestrial habitats are limited to shorelines and are predominantly privately owned. Suitability of herbaceous habitats and presence of milkweed host plants within the Project boundary have not been assessed and Monarch Butterfly occurrence has not been documented.

Potential Project Effects from Operations and Maintenance Activities

The continued operation of the Saluda Project is not anticipated to adversely affect Monarch butterflies. As previously stated, pollinator habitat within the Project boundary has not been assessed and Monarch Butterfly surveys have not taken place. However, if maintenance or Project operations require vegetation clearing activities on DESC-owner property, DESC will follow appropriate steps to evaluate habitats for protected species, including the Monarch Butterfly, before clearing takes place. Appropriate federal and state agencies will be consulted for any work conducted within or adjacent to suitable pollinator habitats.

3. ***The Tricolored Bat is a proposed species for listing under the ESA. If the information is readily available, please provide: (1) any records or observations of this species at or near the project; (2) confirmation of Tricolored Bat habitat including live and dead leaf clusters of live or recently dead deciduous hardwood trees, Spanish moss, lichen or artificial roosts such as bridges or caves at the project; and (3) a description of maintenance actions (e.g., routine mowing or pesticide application) that may affect Tricolored Bat habitat at the project.***

DESC Response:

The Tricolored Bat was proposed to be endangered by the United States Fish and Wildlife Service in September 2022. The species' range covers the east coast of the United States as well as in the central United States, including South Carolina (USFWS 2024h). The Tricolored Bat has an estimated lifespan of around 15 years and is distinguished by the unique tricolored fur that appears dark at the base, lighter in the middle, and dark at the tip. However, the bat often appears yellowish, varying from pale to yellow to nearly orange, but may also appear silvery-gray, chocolate brown, or black.

During the winter, Tricolored Bats hibernate in caves and mines, although in the southern United States, where caves are sparse, the bat often hibernates in road-associated culverts, tree cavities, and abandoned water wells (USFWS 2024h). In the summer, the bats roost in dead leaf clusters, Spanish moss, lichen, pine needles, eastern red cedars, barns, beneath porch roofs, bridges, concrete bunkers, and occasionally in caves (USFWS 2024h). The diet of the Tricolored Bat consists of small insects, including caddisflies, moths, beetles, wasps, flying ants, and flies. The primary factor threatening the Tricolored Bat is white-nose syndrome, a fungal disease that has led to a 90-100 percent decline in winter colony abundance of the species in areas where the disease is prevalent (USWFS 2024h).

Potential Occurrence and Habitat Range

The entirety of the Saluda Project is located within the potential range of the Tricolored Bat. Specifically, the Project lies within the South Carolina Year-round Active Range Zone 1 for Tricolored Bat. Lake Murray comprises the majority of areal coverage of the Project boundary and may provide foraging areas near the shoreline adjacent to suitable bat habitats. Suitable habitat for Tricolored Bat is located throughout the upland areas of the Project boundary, particularly in forested areas unaffected by shoreline development. DESC is not aware of known records or observations of this species at the Project.

Potential Project Effects from Operations and Maintenance Activities

The majority of terrestrial lands are privately owned. As such, DESC has little control over activities, such as land or tree clearing, taking place in potentially suitable habitats for Tricolored Bats. However, on DESC-owned property, appropriate federal and state agencies will be consulted for any work on DESC-owned property conducted near known hibernacula, maternity roosts, or if tree clearing of suitable roost trees is proposed. DESC will follow South Carolina Forestry Best Management Practices, which specifically require all forestry practices in the state to comply with the Endangered Species Act. Generally,

the minimum conservation measures for Year-Round Active Zone 1 for Northern Long-eared Bat and Tricolored Bat includes avoiding the removal of suitable roost trees December 15 through February 15 in certain locations and habitat types (USFWS 2024i). Therefore, the Project maintenance and operation is not expected to adversely affect the Tricolored Bat.

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Georgia Department of Natural Resources (GDNR); L.G. Chafin. 2020b. Species profile for Harperella (*Ptilimnium nodosum*). Georgia Biodiversity Portal, Wildlife Resources Division, Wildlife Conservation Section, Social Circle.

Georgia Department of Natural Resources (GDNR); L.G. Chafin. 2020c. Species profile for Smooth Coneflower (*Echinacea laevigata*). Georgia Biodiversity Portal, Wildlife Resources Division, Wildlife Conservation Section, Social Circle.

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Environmental Justice

4. ***Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, and Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, as amended, require federal agencies to consider if impacts on human health or the environment would be disproportionate and adverse for environmental justice (EJ) communities in the surrounding community resulting from the programs, policies, or activities of federal agencies. To assist Commission staff with its analysis under the National Environmental Policy Act (NEPA), please provide the following:***

   a) ***A table of racial, ethnic, and poverty statistics for each state, county, and census block group within the geographic scope of analysis. In this case, the geographic scope of analysis includes areas within five miles of the proposed project boundary. The table should include the following information from the U.S. Census Bureau's most recently available American Community Survey 5-year Estimates for each state, county, and block group (wholly or partially) within the geographic scope of analysis:***

      i. ***Total population;***

      ii. ***Total population of each racial and ethnic group (i.e., White Alone Not Hispanic, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, some other race, two or more races, Hispanic or Latino origin [of any race]) (count for each group);***

      iii. ***Minority population including individuals of Hispanic or Latino origin as a percentage of total population; and***

      iv. ***Total population below poverty level as a percentage.***

   The data should be collected from the most recent American Community Survey files available, using table #B03002 for race and ethnicity data and table #B17017 for low-income households. A template table is provided below.

   b) ***Identification of environmental justice populations by block group, using the data obtained in response to part 'a' above, by applying the following***

methods included in EPA's Promising Practices for EJ Methodologies in NEPA Reviews (2016).

i. To identify environmental justice communities based on the presence of minority populations, use the "50 percent" and the "meaningfully greater" analysis methods. To use the "50 percent" analysis method, determine whether the total percent minority population of any block group in the affected area exceeds 50%. To use the "meaningfully greater" analysis method, determine whether the minority population percent in any affected block group is 10% greater than the minority population percent in the county using the following process:

1. ***Calculate the percent minority in the reference population (county)***
2. ***To the reference population's percent minority, add 10% (i.e., multiply the percent minority in the reference population by 1.1)***
3. ***This new percentage is the threshold that a block group's percent minority would need to exceed to qualify as an environmental justice community under the meaningfully greater analysis method.***

ii. To identify environmental justice communities based on the presence of low-income populations, use the "low-income threshold criteria" method. To use the "low-income threshold criteria," the percent of the population below the poverty level in the identified block group must be equal to or greater than that of the reference population (county).

c) A map showing the project boundary and location(s) of any project-related construction in relation to any identified environmental justice communities within the geographic scope. Denote on the map if the block group is identified as an environmental justice community based on the presence of minority population, low-income population, or both.

d) A discussion of anticipated project-related effects on any environmental justice communities for all resources where there is a potential nexus between the effect and the environmental justice community. Examples of resource effects may include, but are not necessarily limited to, project-related effects on: flooding; erosion or sedimentation of private properties; groundwater or other drinking water sources; subsistence fishing, hunting, or plant gathering; access for recreation; housing or

industries of importance to environmental justice communities; and construction-or operation-related air quality, noise, and traffic. For any identified effects, please also describe whether or not any of the effects would be disproportionate and adverse.

When you file your response with the Commission, please include any documentation of any consultation you conducted with entities that expressed interest in environmental justice, copies of their comments, and an explanation of how you have addressed their comments in your final response.

DESC Response:

Overview

Consistent with Executive Orders 12898[1] and 14008[2], and the NEPA Phase 2 Rule[3], the Licensee provides the following Environmental Justice (EJ) information for the Saluda Hydroelectric Project (Saluda Project or Project). This overview is meant to provide an understanding of the number of EJ communities present within the Project area and identify potential effects.

Identification of Environmental Justice Communities

No construction or changes in operations are proposed as part of relicensing the Saluda Project. Therefore, a one-mile radius around the project boundary was used to identify EJ communities for this analysis. The thresholds used for identification of populations meeting EJ status are as follows:

- The "meaningfully greater analysis" and the "50 percent" methods were used to determine EJ status based on race:
    - To meet EJ criteria using the "meaningfully greater analysis," a block group qualifies as having EJ communities if the total minority population for a block group is at least 10 percent greater than that of the county population, as follows:

[1] Exec. Order No. 12898, 59 Fed. Reg. 7629 (Feb. 16, 1994). Federal Actions to Address Environmental Justice in Minority and Low-Income Populations.
[2] Exec. Order No. 14008, 86 Fed. Reg. 7619-7633 (Jan. 27, 2021) Tackling the Climate Change Crisis at Home and Abroad.
[3] 89 FR 35442 (effective July 1, 2024)

(County minority population percentage) x (1.10) = percentage above which a block group minority population must be for inclusion as an environmental justice community.

  - To meet EJ criteria using the "50 percent" method, the total minority population must be greater than 50 percent to qualify as an EJ community.

- The "low-income threshold criteria" was used to identify environmental justice communities based on income level, where the block group must have a higher percentage of low-income households than the county.

Environmental Justice Communities Identified

Within a one-mile zone around the Saluda Project boundary there are ninety-one census block groups that could potentially be affected by the proposed FERC relicensing, including sixty-three block groups in Lexington County, nine block groups in Newberry County, twelve block groups in Richland County, and seven block groups in Saluda County. The table and map identify nine additional Census block groups within Lexington County that are contained within the reservoir and are labeled as block group 0; these block groups do not have populations living within them and are not considered as part of this EJ analysis.

There are a total of fifty-three EJ communities within the project area. All the census block groups within the project area include minority populations, thirty of which meet requirements for status as EJ communities related to race, and twenty-three block groups include low-income EJ communities. Of the ninety-one total Census block groups analyzed, seventeen include both minority and low-income EJ communities (Table 1) (Figure 1).

The final community analyzed includes individuals that are unable to speak English. Within the project area there are six Census block groups containing non-English-speaking populations (Table 2). Two block groups with non-English speaking populations are located in Lexington County, one of which is within a low-income EJ block group, and one that is not; one non-English-speaking population is located in Richland County and is not within an EJ block group; and the remaining non-English-speaking populations are in Saluda County, one of which is within an EJ block group meeting both minority and low-income thresholds, and two that are not (Table 2).

Due to the large number of Census block groups within the project area, a system using numbers and a separate key was devised for labeling the block groups on the map to

keep the map as readable as possible. Figure 1 depicts the map of Census block groups and their EJ designations, and Table 1 includes the key for identifying block groups. Table 2 shows the count and percentages for EJ designations.

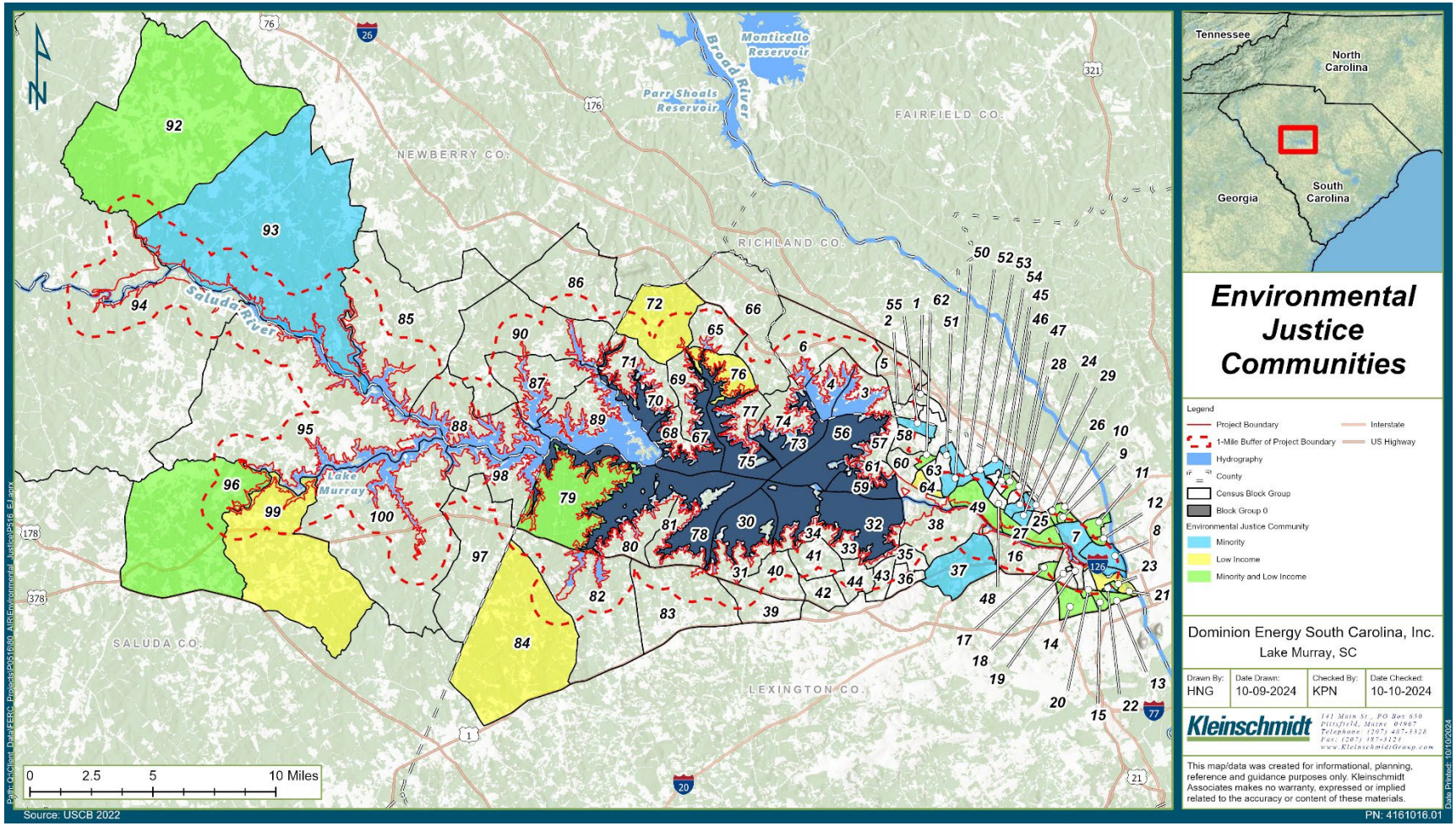

Figure 1. Environmental Justice Communities Within One Mile of the Saluda Project

Table 1. Key For Identification of Census Block Groups

Block Group Map ID	Census Tract, Block Group
1	Census Tract 010305, Block Group 4
2	Census Tract 010305, Block Group 6
3	Census Tract 010310, Block Group 1
4	Census Tract 010310, Block Group 2
5	Census Tract 010311, Block Group 1
6	Census Tract 010311, Block Group 2
7	Census Tract 010403, Block Group 1
8	Census Tract 010403, Block Group 2
9	Census Tract 010411, Block Group 1
10	Census Tract 010411, Block Group 2
11	Census Tract 010412, Block Group 2
12	Census Tract 010413, Block Group 1
13	Census Tract 020300, Block Group 3
14	Census Tract 020505, Block Group 1
15	Census Tract 020505, Block Group 2
16	Census Tract 020506, Block Group 2
17	Census Tract 020506, Block Group 3
18	Census Tract 020508, Block Group 1
19	Census Tract 020508, Block Group 2
20	Census Tract 020509, Block Group 1
21	Census Tract 020509, Block Group 2
22	Census Tract 020509, Block Group 3
23	Census Tract 020509, Block Group 4
24	Census Tract 020510, Block Group 1
25	Census Tract 020510, Block Group 2
26	Census Tract 020510, Block Group 3
27	Census Tract 020510, Block Group 4
28	Census Tract 020511, Block Group 1
29	Census Tract 020511, Block Group 2
30	Census Tract 021021, Block Group 0
31	Census Tract 021021, Block Group 1
32	Census Tract 021025, Block Group 0
33	Census Tract 021025, Block Group 1
34	Census Tract 021025, Block Group 2
35	Census Tract 021032, Block Group 1
36	Census Tract 021032, Block Group 2
37	Census Tract 021038, Block Group 1
38	Census Tract 021039, Block Group 1
39	Census Tract 021045, Block Group 1
40	Census Tract 021046, Block Group 1
41	Census Tract 021047, Block Group 1
42	Census Tract 021048, Block Group 1
43	Census Tract 021049, Block Group 1
44	Census Tract 021050, Block Group 1
45	Census Tract 021106, Block Group 1
46	Census Tract 021106, Block Group 2
47	Census Tract 021106, Block Group 3

Block Group Map ID	Census Tract, Block Group
48	Census Tract 021106, Block Group 4
49	Census Tract 021109, Block Group 1
50	Census Tract 021109, Block Group 2
51	Census Tract 021110, Block Group 1
52	Census Tract 021110, Block Group 2
53	Census Tract 021111, Block Group 1
54	Census Tract 021111, Block Group 3
55	Census Tract 021113, Block Group 2
56	Census Tract 021114, Block Group 0
57	Census Tract 021114, Block Group 1
58	Census Tract 021114, Block Group 2
59	Census Tract 021115, Block Group 0
60	Census Tract 021115, Block Group 1
61	Census Tract 021115, Block Group 2
62	Census Tract 021116, Block Group 1
63	Census Tract 021116, Block Group 2
64	Census Tract 021116, Block Group 3
65	Census Tract 021204, Block Group 1
66	Census Tract 021204, Block Group 2
67	Census Tract 021205, Block Group 0
68	Census Tract 021205, Block Group 1
69	Census Tract 021205, Block Group 2
70	Census Tract 021206, Block Group 0
71	Census Tract 021206, Block Group 1
72	Census Tract 021206, Block Group 2
73	Census Tract 021207, Block Group 0
74	Census Tract 021207, Block Group 1
75	Census Tract 021208, Block Group 0
76	Census Tract 021208, Block Group 1
77	Census Tract 021208, Block Group 2
78	Census Tract 021303, Block Group 0
79	Census Tract 021303, Block Group 1
80	Census Tract 021303, Block Group 2
81	Census Tract 021303, Block Group 3
82	Census Tract 021309, Block Group 1
83	Census Tract 021310, Block Group 1
84	Census Tract 021404, Block Group 1
85	Census Tract 950601, Block Group 3
86	Census Tract 950603, Block Group 2
87	Census Tract 950604, Block Group 1
88	Census Tract 950604, Block Group 2
89	Census Tract 950604, Block Group 3
90	Census Tract 950604, Block Group 4
91	Census Tract 950700, Block Group 1
92	Census Tract 950700, Block Group 2
93	Census Tract 950700, Block Group 3
94	Census Tract 960100, Block Group 1
95	Census Tract 960100, Block Group 2
96	Census Tract 960202, Block Group 2

Block Group Map ID	Census Tract, Block Group
97	Census Tract 960301, Block Group 1
98	Census Tract 960301, Block Group 2
99	Census Tract 960302, Block Group 1
100	Census Tract 960302, Block Group 2

Table 2. Block Groups and Environmental Justice Communities within One Mile of the Saluda Project

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
South Carolina	5142750	3240171	1316074	10304	84972	2443	19361	150550	318875	37%	14%	0%
Lexington County	295934	215263	44153	494	6029	202	1316	9288	19189	27%	11%	0%
Census Tract 020509, Block Group 3	718	203	232	0	102	0	0	22	159	72%	6%	0%
Census Tract 021110, Block Group 1	1165	943	174	0	10	0	0	38	0	19%	4%	0%
Census Tract 021032, Block Group 1	1054	930	0	0	0	0	124	0	0	12%	3%	0%
Census Tract 020506, Block Group 3	1597	888	591	0	79	0	0	11	28	44%	19%	0%
Census Tract 020511, Block Group 1	1106	647	290	0	97	0	0	62	10	42%	0%	0%
Census Tract 021039, Block Group 1	3745	3338	0	0	258	0	53	78	18	11%	1%	1%
Census Tract 020508, Block Group 2	900	859	0	0	0	0	0	7	34	5%	1%	0%
Census Tract 020509, Block Group 1	476	424	25	0	0	0	0	0	27	11%	1%	0%
Census Tract 021109, Block Group 2	1251	856	342	0	53	0	0	0	0	32%	2%	0%
Census Tract 021116, Block Group 3	802	628	133	0	17	0	0	19	5	22%	16%	0%
Census Tract 020510, Block Group 4	1388	658	701	0	7	0	0	22	0	53%	12%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 021109, Block Group 1	1889	1270	270	0	25	0	14	158	152	33%	11%	0%
Census Tract 020510, Block Group 2	1163	888	174	6	77	0	0	18	0	24%	7%	0%
Census Tract 021206, Block Group 2	744	559	170	0	0	0	0	0	15	25%	13%	0%
Census Tract 021106, Block Group 2	997	659	288	0	10	0	0	0	40	34%	16%	0%
Census Tract 021046, Block Group 1	2547	2162	129	0	14	0	0	30	212	15%	8%	0%
Census Tract 021116, Block Group 1	739	255	459	0	16	0	9	0	0	65%	12%	0%
Census Tract 021303, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 020510, Block Group 3	930	125	781	0	0	0	0	24	0	87%	23%	0%
Census Tract 020300, Block Group 3	497	79	178	0	0	0	0	12	228	84%	12%	0%
Census Tract 020509, Block Group 4	452	170	254	0	0	0	0	18	10	62%	19%	0%
Census Tract 020505, Block Group 2	1301	328	535	0	0	0	0	19	419	75%	28%	0%
Census Tract 021110, Block Group 2	1498	827	465	0	96	0	0	51	59	45%	1%	0%
Census Tract 021111, Block Group 3	509	185	299	0	0	0	0	0	25	64%	9%	0%
Census Tract 021048, Block Group 1	2412	2131	122	0	27	0	0	61	71	12%	6%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 021038, Block Group 1	4143	2635	309	0	951	0	0	150	98	36%	4%	0%
Census Tract 021032, Block Group 2	2757	2176	139	0	202	0	0	7	233	21%	3%	0%
Census Tract 021303, Block Group 3	1805	1698	0	0	0	0	0	16	91	6%	0%	0%
Census Tract 021208, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 020505, Block Group 1	2580	1550	423	0	47	25	0	26	509	40%	19%	0%
Census Tract 021115, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021207, Block Group 1	2934	2642	48	0	38	0	0	0	206	10%	6%	0%
Census Tract 021208, Block Group 1	2610	2140	156	0	32	0	0	186	96	18%	14%	0%
Census Tract 021309, Block Group 1	1965	1784	0	0	0	11	0	101	69	9%	2%	0%
Census Tract 021310, Block Group 1	2689	2360	16	0	13	0	0	8	292	12%	6%	0%
Census Tract 021050, Block Group 1	2478	1972	200	0	42	0	0	72	192	20%	3%	0%
Census Tract 021115, Block Group 2	734	718	0	0	0	0	0	0	16	2%	9%	0%
Census Tract 021106, Block Group 3	724	609	88	0	8	0	0	0	19	16%	3%	0%
Census Tract 021116, Block Group 2	1231	909	148	14	28	0	0	17	115	26%	6%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 020509, Block Group 2	1477	1197	155	0	0	0	0	19	106	19%	14%	1%
Census Tract 020508, Block Group 1	1154	970	112	0	37	0	12	10	13	16%	1%	0%
Census Tract 021106, Block Group 1	926	862	41	17	6	0	0	0	0	7%	5%	0%
Census Tract 020511, Block Group 2	1013	420	368	15	24	0	0	141	45	59%	4%	0%
Census Tract 021303, Block Group 2	1345	1264	0	0	0	0	0	61	20	6%	5%	0%
Census Tract 021206, Block Group 1	2311	1979	133	16	16	0	46	55	66	14%	2%	0%
Census Tract 021206, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021205, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021025, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021021, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021025, Block Group 1	1820	1716	0	0	44	0	0	44	16	6%	7%	0%
Census Tract 021204, Block Group 1	2183	1905	156	0	27	0	3	44	48	13%	6%	0%
Census Tract 021115, Block Group 1	1701	1252	231	0	20	0	0	73	125	26%	7%	0%
Census Tract 021021, Block Group 1	2062	2019	0	0	8	0	0	0	35	2%	3%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 021204, Block Group 2	2107	1991	34	0	0	0	0	42	40	6%	11%	0%
Census Tract 021045, Block Group 1	3693	2983	305	0	51	0	0	303	51	19%	4%	0%
Census Tract 021106, Block Group 4	1389	1168	136	50	0	0	0	35	0	16%	0%	0%
Census Tract 021205, Block Group 1	1418	1338	0	0	23	0	19	0	38	6%	4%	0%
Census Tract 021047, Block Group 1	3485	3311	0	0	0	0	0	0	174	5%	3%	0%
Census Tract 021025, Block Group 2	2318	2266	0	0	0	0	0	17	35	2%	11%	0%
Census Tract 021205, Block Group 2	1675	1570	0	0	0	0	0	11	94	6%	4%	0%
Census Tract 020506, Block Group 2	1817	1548	94	0	24	0	0	0	151	15%	3%	0%
Census Tract 021114, Block Group 1	1605	1337	148	7	9	0	0	52	52	17%	7%	0%
Census Tract 020510, Block Group 1	1042	523	515	0	0	0	0	4	0	50%	0%	0%
Census Tract 021114, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan
Census Tract 021208, Block Group 2	1674	1624	0	0	0	0	0	50	0	3%	0%	0%
Census Tract 021113, Block Group 2	2316	1094	1031	0	47	0	0	61	83	53%	8%	0%
Census Tract 021207, Block Group 0	0	0	0	0	0	0	0	0	0	nan	nan	nan

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 021111, Block Group 1	995	573	239	0	70	0	13	16	84	42%	5%	0%
Census Tract 021114, Block Group 2	2036	1503	364	0	39	0	29	46	55	26%	3%	0%
Census Tract 021404, Block Group 1	1616	1211	19	0	0	0	166	12	208	25%	36%	0%
Census Tract 021303, Block Group 1	1219	847	363	0	0	0	0	9	0	31%	17%	0%
Census Tract 021049, Block Group 1	2447	2049	186	0	96	0	14	50	52	16%	11%	0%
Newberry County	37918	22804	11381	81	83	0	118	368	3083	40%	14%	0%
Census Tract 950603, Block Group 2	1336	1179	157	0	0	0	0	0	0	12%	11%	0%
Census Tract 950700, Block Group 2	774	420	343	11	0	0	0	0	0	46%	14%	0%
Census Tract 950700, Block Group 3	1987	1114	634	0	0	0	0	6	233	44%	10%	0%
Census Tract 950604, Block Group 2	1229	1013	216	0	0	0	0	0	0	18%	0%	0%
Census Tract 950604, Block Group 1	569	412	135	0	0	0	0	2	20	28%	6%	0%
Census Tract 950601, Block Group 3	1249	880	360	0	0	0	0	9	0	30%	11%	0%
Census Tract 950604, Block Group 3	1161	1118	6	0	0	0	0	15	22	4%	6%	0%
Census Tract 950700, Block Group 1	1097	694	383	0	0	0	0	0	20	37%	12%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	Total Population (Count)	White Alone, Not Hispanic (Count)	African American/ Black (Count)	Native American/ Alaska Native (Count)	Asian (Count)	Native Hawaiian & Other Pacific Islander (Count)	Some Other Race (Count)	Two Or More Races (Count)	Hispanic Or Latino (Count)	Total Minority Population (%)	Below Poverty Data (%)	Non-English Speaking Persons Aged 5 Years And Greater (%)
Census Tract 950604, Block Group 4	534	447	77	0	0	0	0	10	0	16%	13%	0%
Richland County	416161	169599	195151	615	11991	465	2376	13348	22616	59%	17%	0%
Census Tract 010411, Block Group 2	1680	324	1254	0	21	0	0	62	19	81%	25%	0%
Census Tract 010310, Block Group 2	2676	2245	146	0	188	0	0	0	97	16%	1%	0%
Census Tract 010411, Block Group 1	2052	659	1081	0	146	0	12	109	45	68%	17%	0%
Census Tract 010305, Block Group 4	2132	1237	575	0	155	0	0	44	121	42%	2%	0%
Census Tract 010311, Block Group 2	3312	2699	289	0	206	0	0	51	67	19%	6%	1%
Census Tract 010311, Block Group 1	3590	2836	372	0	116	0	0	108	158	21%	12%	0%
Census Tract 010403, Block Group 2	2335	1012	1034	0	85	0	0	135	69	57%	6%	0%
Census Tract 010413, Block Group 1	783	260	493	0	0	0	0	13	17	67%	20%	0%
Census Tract 010403, Block Group 1	1148	470	592	0	0	0	0	61	25	59%	0%	0%
Census Tract 010310, Block Group 1	2059	1939	82	0	0	0	0	7	31	6%	0%	0%
Census Tract 010412, Block Group 2	2359	691	1603	9	0	0	26	12	18	71%	22%	0%
Census Tract 010305, Block Group 6	1102	805	200	0	16	0	0	43	38	27%	4%	0%

	Race and Ethnicity Data										Low-Income Data	Language Data
Geographic Area	**Total Population (Count)**	**White Alone, Not Hispanic (Count)**	**African American/ Black (Count)**	**Native American/ Alaska Native (Count)**	**Asian (Count)**	**Native Hawaiian & Other Pacific Islander (Count)**	**Some Other Race (Count)**	**Two Or More Races (Count)**	**Hispanic Or Latino (Count)**	**Total Minority Population (%)**	**Below Poverty Data (%)**	**Non-English Speaking Persons Aged 5 Years And Greater (%)**
Saluda County	18952	11047	4369	26	47	0	89	318	3056	42%	19%	1%
Census Tract 960302, Block Group 1	576	547	29	0	0	0	0	0	0	5%	30%	0%
Census Tract 960202, Block Group 2	2080	527	595	0	0	0	0	6	952	75%	42%	3%
Census Tract 960302, Block Group 2	1378	1122	48	18	0	0	0	0	190	19%	8%	2%
Census Tract 960100, Block Group 1	1386	824	515	0	0	0	47	0	0	41%	16%	0%
Census Tract 960301, Block Group 1	815	714	30	0	0	0	0	71	0	12%	15%	0%
Census Tract 960100, Block Group 2	1308	1102	43	0	6	0	0	94	63	16%	11%	0%
Census Tract 960301, Block Group 2	741	592	0	0	41	0	0	0	108	20%	10%	0%

Source: U.S. Census 2022

Discussion

DESC proposes to continue utilizing the Saluda Project primarily for reserve generation on an as-needed basis with a normal target reservoir elevation[4] (el.) range between 352.5 feet (ft) and 356.5 ft, with a maximum operating pool elevation of 358.5 ft, and a minimum operating pool elevation of 343.5 ft. The six-foot operating range between el. 352.5 ft at the end of December and full pool el. 358.5 ft provides adequate usable storage for reserve generation requirements in most years, and the normal maximum operating pool elevation of 356.5 ft provides approximately 99,000 acre-feet of storage below full pool el. 358.5 ft for higher than anticipated inflow during storm events. Additionally, with the Licensee's computer-based Flow Forecast Model, which affords a more accurate prediction of inflow compared to past methods, DESC is able to anticipate high inflow events better and act accordingly by reducing the reservoir in advance of a flood, helping to control downstream impacts.

As related to erosion or sedimentation of private properties, the soil types in the reservoir are potentially susceptible to erosion caused by wave action and reservoir fluctuations. To mitigate significant erosion, the Licensee has undertaken shoreline stabilization projects that reduce the effects of erosion surrounding the reservoir. Additionally, DESC has been working with the South Carolina Department of Natural Resources (SCDNR) as well as other lake interest organizations to improve the shoreline of the reservoir by developing the Lake Murray Shoreline Habitat Enhancement Plan, the purpose of which is to provide improved wildlife habitat, protect water quality, and re-establish vegetation surrounding the shoreline. Activities outside the Licensee's control have the potential to contribute to shoreline erosion of private properties as well, such as boat use and maintenance, debris disposal, recreation, and improper fertilizer and pesticide use. Due to shoreline and erosion concerns that are not a direct result of project operations, DESC has developed a public education and outreach program intended to educate the public about how Lake Murray is managed, including the Shoreline Permitting Program, and education about use of Best Management Practices (BMPs). DESC holds public shoreline management workshops, conducts annual training for property owners, realtors, and construction contractors, and speaks at homeowner organizations' meetings to provide

[4] Unless otherwise indicated, all elevation references in this response are given in North American Vertical Datum 1988; conversion to traditional plant datum (used in numerous supporting studies for this license application and often erroneously referred to as mean sea level) requires the addition of 1.50 feet.

BMP and lake management information to all existing and potential lake shore property owners.

The reservoir for the Saluda Project, Lake Murray, is used as a municipal water source, with five municipal water intakes within the lake. The potential for adverse effects to the municipal water supply exists when low inflow periods prevent the reservoir from reaching the target operating elevation during the spring and summer months, or when drought conditions occur. To address concerns related to potential effects from low flows and drought periods, the Licensee has developed a Maintenance, Emergency, and Low Inflow Protocol (MELIP) as part of the Settlement Agreement signed by the Licensee and nineteen agencies and non-governmental organizations (NGO's). The intent of the MELIP is to allow the Saluda Project to continue fulfilling the three following primary functions for as long as possible during drought periods: reserve electric generation, municipal water supply, and critical downstream flows.

The Saluda Project provides ample passive and active recreation opportunities that are open to the public without discrimination. Activities available include picnicking, boating, bird watching, scenic viewing, fishing, golfing, hunting, and camping, as well as swimming, and other water sports. The SCDNR is responsible for regulating fishing and hunting activities, which are limited by state law within certain proximities to residences and marinas. Members of the public and EJ communities that are properly licensed and abiding by state laws are not restricted by DESC from subsistence hunting, fishing, and plant gathering.

Finally, the Saluda Project is an existing project that has been in place since 1930. The Licensee is not proposing significant civil construction-related activities as part of this relicensing, and does not anticipate construction-related noise, traffic, or air quality issues. Operation-related traffic and noise would be limited to the day-to-day vehicle usage of station operators, as well as seasonal recreation activities. The noise and traffic related to operation of the Saluda Project are not anticipated to be any higher or more burdensome than other industrial activities occurring in the area. Additionally, because hydroelectric does not burn fossil fuels, and produces clean electricity, air quality from project operations will not be affected.

Collaboration between the Licensee and state agencies, public interest groups, and NGOs has led to the creation of an extensive Settlement Agreement (SA) whereby the Licensee has agreed to have in place BMPs, and resource management plans to balance both developmental and non-developmental resources over the coming license term. Due to

these negotiations and the subsequent SA, DESC has put measures in place to limit the effects of the Saluda Project on resources where there may be a nexus with EJ communities. Therefore, there are no anticipated disproportionate and adverse effects to EJ communities from relicensing and continued operation of the Saluda Project.

Consultation with Environmental Justice Communities:

When you file your response with the Commission, please include any documentation of any consultation you conducted with entities that expressed interest in environmental justice, copies of their comments, and an explanation of how you have addressed their comments in your final response.

DESC Response:

South Carolina Electric & Gas Company (SCE&G), the predecessor to DESC, conducted an extensive public outreach effort as part of the Saluda Project relicensing process. This effort included creating a public information website, www.saludahydrorelicense.com, to share project-related updates with interested members of the public. Additionally, numerous public meetings were held throughout the pre-filing period to gather input and maintain transparency.

Specifically, SCE&G hosted public workshops in October 2004 in each county where the Project is located (Newberry, Saluda, and Lexington/Richland Counties) to solicit feedback on project-related concerns. Quarterly public meetings were also conducted during the pre-filing process, offering both morning and evening sessions to maximize public participation and provide updates on key relicensing issues.

To foster collaboration, SCE&G formed Resource Groups comprised of interested stakeholders committed to identifying project issues and developing recommendations to address them. These groups met regularly throughout the relicensing process, serving as a platform for discussion and cooperation.

Public comments submitted during the pre-filing process were cataloged on the relicensing website, which also included a calendar of upcoming meetings. The comprehensive database of public consultation efforts were submitted to FERC along with the Final License Application and the CRSA to document the collaborative and transparent nature of the relicensing process.

Exhibit G

5. ***Revised Exhibit G maps were filed on October 31, 2018. However, revised project boundary data were not concurrently filed in a geo-referenced electronic format. Please file the revised project boundary data in a geo-referenced electronic format in accordance with section 4.51(h) [see section 4.41(h)] of the Commission's regulations. If possible, please use a polygon geometry type (i.e., closed shape(s)) to represent the revised project boundary, rather than a polyline geometry type (i.e., noncontinuous lines). Also, if readily available, please include point or polygon data for all existing, existing future, and proposed future recreational features. In addition, please state the total area of the proposed boundary, in acres.***

DESC Response:

Revised project boundary data and proposed future recreational features data in a georeferenced electronic format are being filed separately, in conjunction with this filing. The total area of the proposed boundary is 67,560.81 acres.