



October 9, 2007

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

Re: Virginia Electric & Power Company (Dominion) Project: P-906-006

Dear Secretary Bose:

Friends of the Rivers of Virginia (FORVA), the Float Fishermen of Virginia (FFV) and Coastal Canoeists have reviewed the Environmental Assessment for the new hydropower license for the Cushaw Hydroelectric Project and we have the following comments.

The Environmental Assessment (EA) does not recognize the relationship between the dam that created Cushaw pool and the impact to white water boaters. The relationship is direct. The EA states that the relationship is only “loosely connected to the project” which is completely wrong.

If the dam were not there, paddlers would have no problem getting to the public boat landing at Rocky Row Run, plus they would have another 1.6 miles of free-flowing whitewater river to paddle. However, the flat water section that the dam creates is a major obstacle. This is especially difficult for novice or older paddlers. The fact is that the hydroelectric project has a direct impact on the public’s use of the James River. Paddlers need a takeout alternative at the head of the Cushaw pool.

The EA states that the priorities for a new takeout are: 1. Lock 14; 2. CSX Culvert; 3. VDOT Picnic area. The EA does not reflect the extensive study, consideration and revisions made by the participants in the process since April 2004. The correct priorities are: 1. Lock 14; 2. Matts Creek (referred to as “Snowden” in the Dominion/DCR MOA); 3. Locher Landing.

In the event that none of these access points are found feasible, the funds were to go to: 1. an alternative site in the region as agreed to by the parties or a portage around the dam; 2. remaining funds were to go to public access to any stream in the James River Basin west of Lynchburg. The EA has this incorrect as well, stating that the funds would go a portage around the dam and an upgrade of Locher Landing. No mention was made of the alternative site in the region.

Dominion has pledged to provide \$165,000 to develop a take out at the head of pool. FERC should recognize the need for that mitigation in the EA and require Dominion to meet that requirement. We strongly disagree with the FERC recommendation against “developing a whitewater boating take-out area”. Further, addressing the matter of access “outside of the FERC license” obviates the need for the existence of FERC.

The EA states that no user groups commented on the REA notice. This is not accurate. The three groups above have consistently provided input and comments to Dominion, DCR and FERC throughout the process. The information in the EA seems to be disconnected from the entire EA process.

The recommendations of our boater groups have been accepted and endorsed by Dominion and other project participants. We believe FERC should require Dominion to provide those project improvements as agreed to in the multi-party MOA that has already been signed.

We also believe that FERC should require Dominion to provide the \$10,000 to the US Fish and Wildlife Service for the restoration of the endangered James River spiny mussel and take other measures to protect wildlife as Dominion has agreed to do.

We look forward to your prompt revision of this EA.

Sincerely,



Bill Tanger
FORVA
PO Box 1750
Roanoke VA 24008
Office: 540-777-1020

Jeff Wold
FFV
PO Box 1750
Roanoke VA 24008
Cell: 540-871-3452

Dave Bernard
Coastal Canoeists
PO Box 1750
Roanoke VA 24008
Cell: 540-951-2716