## MEETING NOTES Stevens Creek Hydroelectric Project (FERC No. 2535)

Dominion Energy South Carolina, Inc. Water Quality Adaptive Management Plan

## January 30, 2025

Final JAG 3/7/25

## **MEETING ATTENDEES<sup>1</sup>**:

Ray Ammarell – Dominion Energy Will Barnes – Dominion Energy Jason Bettinger – SCDNR Amy Bresnahan – Dominion Energy Caleb Gaston – Dominion Energy Aaron Gray – GAWRD Jenn Güt – Kleinschmidt David Hedeen<sup>\*</sup> – GAEPD Andy Herndon<sup>\*</sup> – NMFS Suzy Hill<sup>\*</sup> – USACE Fritz Hoogakker<sup>\*</sup> – Dominion Energy Alison Jakupca – Kleinschmidt

Kevin Mack – NMFS Elizabeth Miller – SCDNR Jason Moak – Kleinschmidt Clint Peacock – GAWRD Will Pruitt<sup>\*</sup> – Kleinschmidt Dewey Richardson<sup>\*</sup> – GAEPD Fritz Rohde<sup>\*</sup> – NMFS Darrel Shier<sup>\*</sup> – Dominion Energy Jamie Sykes<sup>\*</sup> – USACE Paul Vidonic<sup>\*</sup> – Dominion Energy Rusty Wenerick<sup>\*</sup> – SCDES Keith Whalen – USFS

\* attended virtually

Not in Attendance: USFWS

These notes are a summary of the major points presented during the meeting and are not intended to be a transcript or analysis of the meeting.

**MEETING PURPOSE**: The purpose of the meeting was to develop the implementation measures for the Stevens Creek Hydroelectric Project (Project) Water Quality Adaptive Management Plan (AMP).

<sup>&</sup>lt;sup>1</sup> Abbreviations/Acronyms: GAPED = Georgia Environmental Protection Division; GAWRD = Georgia Wildlife Resources Department; Kleinschmidt = Kleinschmidt Associates; NMFS = National Marine Fisheries Service; SCDES = South Carolina Department of Environmental Services; SCDNR = South Carolina Department of Natural Resources; USACE = United States Army Corps of Engineers; USFWS = United States Fish and Wildlife Service; USFS = United States Forest Service



Alison, Kleinschmidt, began the meeting with a welcome and led introductions of meeting attendees. Ray, Dominion Energy, provided relevant safety information about the meeting building to in-person attendees and led a safety moment about winter weather.

Section 5.0 of the draft AMP that was included in the Project's Final License Application (FLA) filed with FERC<sup>2</sup> was reserved for further discussion with the AMP following the completion of the 2023 Water Quality Study. In a recent Additional Information Request, FERC asked that implementation measures be further clarified with the Review Committee. Therefore, the primary objective of the present meeting was to deliberate potential implementation measures for the AMP in enough detail to allow for FERC analysis.

Continuous water quality monitoring was added as an implementation measure under Section 5.0 to reflect what Dominion Energy proposed in the Project FLA. Dominion Energy has contracted with USGS<sup>3</sup> to implement continuous dissolved oxygen (DO) and temperature monitoring at USGS gage no. 02195529 (Savannah River Near Evans, GA<sup>4</sup>) and USGS gage no. 021963601 (Stevens Creek at Woodlawn Rd nr Murphy Village, SC<sup>5</sup>). Both gages have been installed and are collecting data.

Kevin, NMFS, asked if there has been any correspondence from FERC on Dominion Energy being allowed to discontinue the water quality monitoring effort under Article 405 of the Project's current license. NMFS again expressed their support of discontinuing the current monitoring. Dominion Energy had not received anything from FERC to date; therefore, they contracted with Kleinschmidt to collect the January 2025 data and are working with USGS to continue data collection as required until FERC has provided notice.

Kevin commented that the current USGS dataset from the Project is robust, and one potential use of the Project's Fishery Resources Enhancement Fund (Enhancement Fund) could be to review the data and analyze how the watershed has changed since the monitoring began; the analysis would likely show the installation of the oxygenation system in the upstream Thurmond Dam reservoir. Amy, Dominion Energy, noted that the Enhancement Fund group is due to convene, and Kevin's project idea is something that could be discussed. However, Amy was not sure if analyzing the dataset would qualify as eligible under the Enhancement Fund. Keith, USFS, remarked that it would be good to compare the USGS historical data with the continuous gages for a year or two. Jason M., Kleinschmidt, added that such a comparison would likely not need to be for all gages and/or data, but a subset.

Alison discussed the proposal of water quality monitoring data review. Dominion Energy could provide a brief a yearly report/memorandum that summarizes DO data to determine



<sup>&</sup>lt;sup>2</sup> FERC = Federal Energy Regulatory Commission

<sup>&</sup>lt;sup>3</sup> USGS = United States Geological Survey

<sup>&</sup>lt;sup>4</sup> GA = Georgia

<sup>&</sup>lt;sup>5</sup> SC = South Carolina

the percentage of instantaneous readings below 4.0 milligrams per liter (mg/L), and the number of daily average values below 5.0 mg/L. Temperature data could also be summarized to determine the range of water temperatures observed throughout the year. Additional data could include information on flows from Thurmond Dam and/or an analysis of Project flashboards; Alison noted the Review Committee could determine what information could be the most useful. Amy added that she is working with the Project plant staff to gather more information on when and how the flashboards trip so that dataset will be more robust moving forward.

Alison stated that in addition to reviewing the water quality data, the Review Committee could choose to develop an annual work plan outlining water quality-related activities performed under the AMP; however, it was noted that this may not be enough level of detail for FERC. The current due date listed for the annual report to be filed with FERC is April 30<sup>th</sup>, but Alison suggested the group consider a different date since April 30<sup>th</sup> is the due date for the Parr Hydroelectric Project annual adaptive management plan reports, of which many meeting attendees were also a part of. The annual consultation under the Project AMP would also include a meeting to occur in the early part of each year.

Kevin commented that NMFS is still interested in spill flow and/or hydraulic modeling to determine if water quality conditions in Stevens Creek are improved under certain flow conditions over the Project dam. The group discussed whether a CE-QUAL-W2 model<sup>6</sup> could produce results that would help inform the Review Committee; more information was determined to be needed. Elizabeth, SCDNR, inquired if Dominion Energy would be amenable to having a firm attend a meeting and present to the Review Committee the different options for modeling conditions at the Project. Ray responded that they were open to it, but it would need to be discussed with management. The group discussed how that measure would be incorporated into the AMP. It was noted that additional data would likely need to be collected in order to conduct a model, such as sediment oxygen demand. The AMP was revised to reflect that should the Review Committee determine a model is appropriate, a water quality model and necessary supporting data would be further explored.

Jason M. stated that there are inputs from municipalities upstream of the Project boundary, and the group could lean on SCDES for assistance to determine what these inputs consist of and any potential mitigation measures. Rusty, SCDES, responded that if water quality issues are determined to be watershed-wide, this could be addressed through a TMDL<sup>7</sup>; however, the group would likely meet resistance from the permitted dischargers. Rusty added that it would be imperative to have a good understanding of the issue before taking this step. Keith commented that since the biggest issue is DO levels, it may be helpful to have long-term



<sup>&</sup>lt;sup>6</sup> CE-QUAL-W2 is a water quality and hydrodynamic model in 2D (longitudinal-vertical) for rivers, estuaries, lakes, reservoirs, and river basin systems. W2 models basic eutrophication processes such as temperature-nutrient-algae-dissolved oxygen-organic matter and sediment relationships.

<sup>&</sup>lt;sup>7</sup> TMDL = Total Maximum Daily Load

monitoring upstream of the Project boundary. Jason M. noted that some data regarding volumes of wastewater discharge is available via the USEPA<sup>8</sup>, but he noted that they may need assistance from SCDES in navigating the dataset. Kevin added that if the group is considering contributions from Stevens Creek, it is also reasonable to discuss contributions from the Savannah River side of the Project. Language regarding the modeling assessment implementation measure was drafted, reviewed, and revised in real-time. Ray added that if the group decides on a modeling effort, Dominion Energy could solicit proposals and provide those to the Review Committee. Elizabeth commented that SCDNR would like to see actual action in the AMP. Keith responded that it was important to consider that the group should not advocate for a model just for the sake of modeling because the experts could determine that there is not a good model for answering the questions about the Project. Elizabeth noted that modeling is a rapidly developing industry and would like to see the effort re-explored in 5 to 10 years if modeling cannot answer the question now. This was amenable to Dominion Energy. Elizabeth would also like to see some monitoring proposed post AMP.

Elizabeth stated that she does not believe the water quality issue at the Project will be resolved within 5 years, and thus, language limiting the AMP period to such should be removed. Alison commented that there will need to be some sort of clause that closes the AMP. Keith noted that the group could decide to extend out the schedule of the AMP beyond 5 years. Kevin asked how 10j recommendations would be incorporated into the AMP. Alison replied that ideally the 10j recommendations would be consistent with the AMP. Clint, GAWRD, suggested that instead of attempting to define a time period for the AMP, the annual report could include a component in which the Review Committee decides each year whether or not the AMP will continue the following year. This was agreeable to Dominion Energy.

Elizabeth requested some discussion on the development of a Water Quality Management Plan (WQMP) instead of just an AMP. It was concluded that the WQMP would be the closure for the AMP, which was agreeable to the group.

It was agreed among the group that June 1<sup>st</sup> would be the filing date for the annual report with FERC as opposed to April 30<sup>th</sup>.

Keith asked if during the AMP process, it is discovered that Project operations are causing a DO issue, but modeling indicates that there are no solutions, could there be a Habitat Enhancement Program (HEP) fund developed to conduct work in the watershed to improve DO. Amy responded that Dominion Energy discussed continuing the Enhancement Fund moving forward. The decided mechanism can be discussed in the WQMP. Alison believes



<sup>&</sup>lt;sup>8</sup> USEPA = United States Environmental Protection Agency

that FERC would not include a HEP fund in the Project license so the group should have flexibility to develop and manage such a program.

Kevin suggested adding more specificity to the schedule for Year 1 and Year 2 since there is more understanding of some work that could be conducted those years.

Kevin asked Dominion Energy if they expected the agencies to review information related to FERC's Additional Information Request. Alison responded that that is not anticipated.

Jason M. asked Keith if the USFS has been able to assess the full impact of Hurricane Helene on the area. Keith responded that they are still removing trees and clearing roads, so no, an assessment of the hurricane's impact has not yet been conducted. Jason M. noted that a lot of the decaying matter resulting from the hurricane will likely enter the Stevens Creek watershed and create or further exacerbate water quality issues.

David, GAEPD, provided a comment that the AMP does not mention continuing water quality monitoring directly up- and downstream of the Project (at USGS sites 2 and 3), and that is what GAEPD is currently requesting and will request as part of the 401 Water Quality Certification (WQC). Dominion Energy does not currently have water quality monitors in those locations. The continuous water quality data collected in 2021 and 2023 indicates that there is good DO water being released from the Project, but Dominion Energy understands GAEPD's position that the compliance point for the WQC is downstream of the Project. GAEPD's preference is that the continuous monitors are installed on the Georgia side of the river. Jason M. reflected that installing a monitor directly downstream of the powerhouse should be achievable but there would be some vegetation issues to navigate with installing a monitor directly upstream of the Project powerhouse. Alison noted that Dominion Energy intends to hold a WQC meeting with the GAEPD ahead of the Ready for Environmental Analysis to be issued by FERC.

The meeting was adjourned.

## **ACTION ITEMS:**

• Kleinschmidt to revise the AMP and distribute it to the group for a 30-day review.

