



Matthew J. Strickler
Secretary of Natural Resources

COMMONWEALTH of VIRGINIA
Department of Game and Inland Fisheries

Robert W. Duncan
Executive Director

March 7, 2018

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

Re: Draft Application For Original License For Major Water Power Projects 5 Megawatts Or Less Scott's Mill Dam Hydroelectric Project, FERC P-14867-000

Dear Secretary Bose:

The Virginia Dept. of Game and Inland Fisheries (VDGIF) appreciates the opportunity to comment on the Draft License Application for the Scott's Mill Hydroelectric Project (P-14867).

To begin, we fully concur with the comprehensive suite of comments submitted by the U.S. Fish and Wildlife Service. The only additional comments we have to offer are listed below.

- **Recreation** – We would prefer to see contingency alternatives should the applicant be unable (through no fault of their own) to provide a boat access facility in the headpond of Scott's Mill Dam. The draft license application states that the applicant will attempt to coordinate boating access facility improvements with a private landowner in the headpond. Since no agreement has currently been reached, it is possible that upstream landowners may not support this proposal. As such, we would like to see alternatives listed for improving boating access on the James River at alternative locations, should access options to the headpond prove to be impractical.
- **Fish Passage** – As stated above, we fully support the USFWS comments. Additionally, we are fully supportive of the applicant's initiative to provide immediate passage for American Eel and Sea Lamprey, as well as consideration of installing a fish passage facility for resident and migratory species. As outlined by the USFWS, we would prefer to see a nature-like fishway if this proves to be a practical option. Should a nature-like

fishway prove to be impracticable, we would appreciate the opportunity to work with the applicant on alternative designs.

- Downstream Flows – Given the high quality of habitat on the north side of the James River immediately below Scott's Mill Dam, we do have concerns regarding habitat alterations resulting from the siting of the powerhouse. We encourage the applicant to consider aligning some or all of the turbines to direct flows toward the center of the river (corresponding with current conditions) as much as possible. This would be particularly important during periods of lower stream discharge.

We have nothing further to add beyond these additional comments, but simply reiterate our support of the comments provided by USFWS. Thank you again for the opportunity to provide input. Should you have any questions, or need additional information, please contact Scott Smith at (434) 525-7522 or scott.smith@dgif.virginia.gov.

Sincerely,



Scott M. Smith
Regional Fisheries Manager
Virginia Dept. of Game and Inland Fisheries

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