

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL POWER COMMISSION

In the Matter of) Project No. 2317
)
APPALACHIAN POWER COMPANY)

COMMENTS OF GRAYSON COUNTY, VIRGINIA;
ASHE COUNTY, NORTH CAROLINA;
AND ALLEGHANY COUNTY, NORTH CAROLINA,
ON THE COMMISSION STAFF DRAFT ENVIRONMENTAL
IMPACT STATEMENT

GRAYSON COUNTY, VIRGINIA
By Lorne R. Campbell, Of Counsel,

ASHE AND ALLEGHANY COUNTIES,
NORTH CAROLINA
By Edmund I. Adams, Of Counsel,

NEW RIVER CHAPTER OF THE
IZAACK WALTON LEAGUE OF AMERICA, INC.
By Lorne R. Campbell and Edmund I. Adams, Of Counsel,

THE UPPER NEW RIVER VALLEY ASSOCIATION
By Lorne R. Campbell and Edmund I. Adams, Of Counsel,

April - 1973

INTRODUCTION

We deem it appropriate to file these consolidated Comments on behalf of all the people in the project area of Virginia - North Carolina.

In the past, others have claimed to speak for our people. The elected governing boards of the three counties are the makers of these Comments; by this action they discharge their constitutional duties to their people. Others who have heretofore and may hereafter presume to speak for our people have no right or authority to do so.

The Staff Draft Environmental Impact Statement was written and circulated only after the Supreme Court denied certiorari in the Greene County case, where the Court of Appeals for the Second Circuit held that the FPC must write and circulate its own Environmental Impact Statement rather than merely adopt an applicant's statement as its own. And the FPC Staff must do more than comment on an applicant's statement. Here, the Commission has previously circulated applicant's statement as its own. Yet on Page 2 of the SDEIS we are told that "this is a revision of the earlier Staff Draft". (April, 1971). Anyone who compares the two statements can readily determine that the SDEIS is indeed a mere revision of the earlier statement prepared by Applicant, and not the independent work of Staff. Its most notable characteristics are its omissions. The only significant difference is the elimination of water storage in the reservoirs for the purpose of

low-flow augmentation for water quality control, and an attempted re-allocation of that water storage for other contrived purposes.

In the April 1971 Statement, we are told who the Intervenorers are, when, how and why they intervened, and some testimony from their witnesses as well as the Applicant's, is mentioned. Except for brief mention of two or three intervenors in the first few pages of the current statement, nowhere are we informed what the objections to the project are -- or even that there ARE objections.

The statement provides a great deal of information on the people of the project area; We are told what their average income is, how many live in each square mile and in each dwelling, what kinds of animals inhabit their woods, which fish spawn in their rivers, the types of trees that grow in their forests, how much rain rains on them, and from where, how fast and how cold are the winds that blow on them. But nowhere are we told that these same people have been fighting the project almost since its very conception. This total disregard for the opinions and objections of the people of the area--whose lives and land will be completely altered--shows gross negligence (to put it as kindly as possible) on the part of Staff. Staff's assessment of the environmental impact on the project area is: "What is now bucolic would become busy."

Several major briefs have dealt almost exclusively with the effects of the project on the ecology of the area. Detailed studies

were made and recorded on how the change in flow and temperature of the waters would adversely affect fish propagation, aquatic organisms, recreational fishing and canoeing. Although much of the information in the SDEIS was lifted out of them, there is no acknowledgment in the Statement that any of these studies was ever made. Nor is there included any information from them which is unfavorable to the project. We deeply resent the practice of those connected with the Commission and the Department of Interior of deliberately ignoring and suppressing all that great body of information filed with the Commission which demonstrates that the project ought not to be licensed. The accompanying air of pretended impartiality has deepened our feeling.

Staff occupies itself with economic matters in much of its statement. To the extent that Staff has failed to recognize the difference between economic and environmental issues and has addressed itself to economic questions, we do likewise, because we are merely commenting on what Staff has said. Practically all the economic information used in the Statement came from Applicant. Staff has carefully ignored evidence put in the record by project opponents. Much of Applicant's evidence relied on by Staff has been proven false, or at least made to appear of questionable validity, in the hearings. As a demonstration of what we mean, we are attaching

some economic information as appendices to these Comments and will ask to make this information a part of the record.

Staff includes a section titled Current River Flows. The text is one paragraph long and tells us that "Generally higher flows occur in late winter and spring . . . with lower flows occurring in late summer and fall." The accompanying graphs and charts stuck at the end of the report are never explained or mentioned in the text.

The effect of the project on fish and wildlife is succinctly summarized: "The presence of the reservoirs would restrict the movements of game and other animals to a greater extent than the river does at present."

We are never informed where the power to be produced by the project is needed at present and in the future.

The treatment of the drawdown issue is a masterful concealment of facts and figures.

Alternatives to the Blue Ridge Project are not carefully studied-- they are little more than mentioned.

The careless, vague, contradictory, ambiguous and meaningless rhetoric that characterizes this statement appears over and over again with absolutely no attempt as supportive evidence or detail. Phrases such as: "exercise a profound effect"; "very substantial reductions"; "generally suitable"; "at times"; "as the need arises"; "minimal

environmental impact"; "would undoubtedly result"; "significantly affecting"; "possibly some"; and "offer some hazard" continually take the place of specific information and undermine the credibility of the entire statement. Most significantly, Staff's steadfast determination to ignore virtually every piece of evidence and every legitimate argument in opposition to the project renders the SDEIS useless for its intended purpose.

These Comments are also filed on behalf of the New River Pioneer Chapter of Daughters of the American Revolution, and Young's Chapel Baptist Church.

COMMENTS

(For continuity and clarity, comments will follow the order of the material as it is presented in the Draft Environmental Statement. Page and paragraph numbers will introduce each comment.)

p1/#2: Power produced by the Blue Ridge Project would be used "to serve customers in: Virginia, Indiana, Kentucky, Tennessee, Michigan, Ohio and West Virginia," and "will be available IF NEEDED (emphasis added) to serve consumers in the eastern and central United States." That's an awfully big "if" since we are later informed (p 45) that brownouts in recent summers are evidence of power shortages. There certainly haven't been any recent brownouts in the region served

by Appalachian Power Company. Who needs this power and where is it going? If the Applicant doesn't know--they don't need the project, and if they do know, why isn't the information documented for the public?

p5/#2: "The primary purpose of the storage was to dilute the pollution . . ." The use of "was" indicates that Staff considers the pollution dilution issue obsolete. That being the case, is their recommendation of the modified proposal still to be considered the "'most comprehensive' plan of development . . ." ? (p5/#1)

p6/#4: We all know that Administrative Law Judge Levy twice recommended that the project be built. But Staff fails to note that he has been given jurisdiction over the project for a third time and that intervenors have filed a motion to disqualify him on grounds of prejudice in favor of the Applicant. (Judge Levy also presided over the Greene County case.)

p8/#4: The last sentence of this paragraph grandly informs us that "The metamorphic rocks exercise a profound effect upon the ecology of the stream." However, it never bothers to inform us what this effect is.

p9/#4: The project area's "rugged mountainous terrain and narrow stream valleys have limited its accessibility and restricted its development." Development of what, and accessibility to whom? If an area is not suited to sprawling urban and industrial complexes is it necessarily

"restricted" in its development? Where is there an authoritative analysis of (1) whether the region should be "developed", and if so, (2) what the nature of that development should be?

p10/#2: First we are told that "Much of the area is not capable of sustaining intensive agriculture . . ." but that "The bottom lands along the river . . . provide rich soil for agriculture use use." These same bottom lands will, of course, be flooded by the project.

p10/#2: It is comforting that the water of New River is recognized as being relatively pure ("no water pollution problems") as compared to that in the middle and lower reaches of the river. Could this profound observation possibly be responsible for the concept of using this "relatively pure" water for pollution dilution?

p10/#4: Reports prepared years ago refer to 1985 as the cutoff year for the 12-foot drawdown. Would it not be more realistic to figure this cutoff point in number of years after construction?

p10/#5: The recommendations by Staff for the uses and amount of storage capacity in the lower reservoir give that reservoir a working drawdown of 56 feet: "The usable reservoir storage capacity for power and other purposes would be 626,000 acre-feet between elevations 2,390 and 2,446." --a drawdown of 56 feet.

Previous reports have said that the top 12 feet of the reservoir would be reserved for flood control storage giving us a normal working

drawdown of 44.4 feet. Even if these 12 feet (160,000 acre-feet of storage) were not used, the drawdown would still be 56 feet figuring from maximum surface elevation of the reservoir. But this 12-foot space is, in fact, going to be used: "The 140,000 acre-feet of water that would be stored in the lower reservoir during emergency power operations can be temporarily stored in the space reserved for flood control because equivalent space for flood control purposes would be available in the upper reservoir." (p 22)

And again: "The islands in the lower reservoir would not be as attractive for recreation as those in the upper reservoir, because they would be in the flood control pool and thereby subject to PERIODIC FLOODING (emphasis added) up to elevation 2,446." (p 28)

On page 32, Staff figures the drawdown in the lower reservoir at 30 feet but estimates this drawdown for only 280,000 of the 626,000 acre-feet of "usable storage" in that reservoir. Staff admits that the figure does not include "the allocation of 346,000 acre-feet of storage for flood control." Why is the drawdown figured for less than one-half the acre-feet of the reservoir's "usable storage capacity"? All of the 626,000 acre-feet will be used in the lower reservoir-- not only in case of a flood, but for other uses when water will be "temporarily stored in the space reserved for flood control purposes would be available in the upper reservoir."

This is a working drawdown of 56 feet. By scattering the information concerning uses for the lower reservoir throughout the statement (pp. 5, 10, 11, 12, 22-24, 26, 28, 32-33, 34) Staff has avoided mentioning the 56-foot drawdown. In doing so they have deliberately avoided mention of the most obvious and pernicious consequence of the project, both for local residents as well as future recreation use.

The drawdown has been one of the primary questions around which all of the opposition to the project has been united. By failure to address itself to this question--indeed by obscuring it utterly--the statement seriously undermines its usefulness and credibility as a "scientific" document, and opens to question both the mentality and motives of those responsible for preparing it.

Vague rhetoric, insufficient and contradictory information are one thing--we have seen it in all previous reports. But for a document which purports to be a reconsideration of all available evidence gathered in a decade of litigation, to ignore the major argument of the opposition is more than sloppy homework. It is a deliberate suppression of basic facts.

p11/#3: "The project would have no significant effect upon navigation." Of What? And who determines what constitutes a "significant effect"?

p12/#1&2: The Statement does not tell us whether or not the pumping and generating cycles are simultaneous--but from the process

descriptions we assume they are not. By adding up the hours for each cycle we conclude: Something would be pumped or generated approximately 23 hours per day.

Is this power needed? Where is it needed? How far into the future will it be needed? "If, as Appalachian proposed, the project moves up to higher positions on the AEP System load curve over time, the hours of generation and, therefore, energy production at the Upper Development would decline and eventually level off in later years." And, "the associated annual pumping requirement would also decrease." This means that in the future Blue Ridge WILL NOT BE USED TO ITS FULL CAPACITY. Again we ask, is this power needed or not? Why build a project whose "energy production . . . would decline and eventually level off" in later years? What is meant by "later years"?

Appalachian has stated that even if the water quality storage requirement (which was responsible for the modified proposal in the first place) is abolished, they need the entire project for power production. They applied for a license for the original project in 1965; the modified project was proposed in 1968-- a period of three years. Within this three-year period, the original proposal was declared obsolete because of unexpected increased requirements for power; indeed a project twice as large was needed to meet these requirements. Now they tell us that in the future the project will not be used to its

full capacity. Is the long-range purpose of Blue Ridge to be used only as a tie-in in case of "emergency conditions" in the Midwest or Northeast? If so, how often would these "emergency conditions" arise?

p13/top of page: "...polluting effects associated with pumping . . . WOULD LIKELY (emphasis added) occur at times when other polluting influences, such as automobiles and daytime industrial and commercial activity, are at relatively low levels." On page 19 Staff describes the area as "sparsely settled" and maintains that the "industrial development of the region has been retarded by the primitive nature of the roads in the area and by the absence of suitable industrial sites with access to the river," and that "the economy of the project area is based primarily on agriculture and small manufacturing." There are no "other polluting influences" in the area. The project would be the first.

p14/#1: What are the "very substantial reductions in water surface elevation and surface area" at the Sutton and Summersville reservoirs? and what are the results? Without these facts and figures, no meaningful comparisons between the Sutton and Summersville and the proposed Blue Ridge reservoirs are possible.

p14/#2: Claytor Project: Usable storage capacity with a 27-foot drawdown is 100,000 acre-feet, but Appalachian has chosen to use only 34,000 acre-feet of storage with an 8-foot drawdown. Why? What

happened with the larger drawdown? The omission of this type of detail renders this information useless.

p16: Much is made over the issue of flood control and the benefits to be derived from that aspect of the project. Flood damages in the New River Vally are negligible--much less than in the portion of this river basin that already has flood control dams. Consider: Average annual damages in the Kanawha Valley are estimated at \$1,200,000 This is with flood control protection from Bluestone, Sutton and Summersville Reservoirs.

Average annual flood damages from the Blue Ridge site to Bluestone Reservoir are only \$57,000. In other words, the undammed portion of the river incurs flood damages that are approximately 4% of those realized in the heavily dammed portion of the river.

(Staff omitted the above information from their current statement. It is found in the April 1971 Statement on pages 63-64.)

If the flood of record recurred in the Kanawha Valley, damages under present (dammed) conditions would exceed \$200,000,000. In the Blue Ridge, flood of record would result in damages of only \$2,350,000 under present (undammed) conditions. Agriculture in the three counties produces and sells products in excess of that amount every year.

p18/#3-5: Staff refers to the designation by Congress of the three counties of the project area "as part of the underdeveloped

Appalachian region." This designation occurred in the Appalachian Regional Development Act of 1965. The Act applied to a large region in several states. The project area is on the fringes of that region. It is time to update that 8-year old information in respect to the counties of the project area.

Despite the possible inundation of 40,000 acres and the isolation of approximately 16,000 more acres for non-power generating purposes, the people of these counties have managed to bring in new non-polluting industries which have developed to the point where there is now a serious labor shortage. This shortage would be greatly aggravated by displacement of some workers and isolation of others. Where is there a study of how industrial workers will get to the factories across Applicant's "great inland sea"?

p19/#1: Perhaps the average income in the counties is low, but so is the cost of living. Almost without exception, each family in the county maintains a small fruit and vegetable garden in addition to raising cattle, hogs and chickens. Many of the older members of the community have retired to their farms and provide these services for brothers, sisters, sons, daughters and grandchildren. It is estimated that a family of five that raises, slaughters and butchers one beef cattle can cut their food costs by one-third each year.

p19/#2: "The industrial development of the region has been retarded by the . . . absence of suitable industrial sites with access to the river." There are flourishing industries all over the world that have no access to any river because they don't need it. If it is contemplated that there will be industries which use water from the impoundments, what about the environmental impact of these industries?

p19/#3: ". . . present-day recreation employment in the project area appears insignificant and . . . such recreation employment as presently exists will decline in the future in the absence of the proposed Blue Ridge Project." This is absolutely not true. There is already as much "white -water" recreation on the river as it now is, as there would be on the proposed impoundments. Virginia's Department of Conservation and Economic Development is currently spending thousands of dollars in the Grayson Highlands Park and has proposed millions of dollars for the national recreation areas in Whitetop and Mount Rogers. These developments will in no way be prevented or affected by the project or lack of it.

p21/#5: How often would the additional 140,000 acre-feet of storage in the Upper Reservoir be required for spinning-reserve operations? Staff's answer "at times" is not suitably informative.

p22/#2: Staff's conclusion that we should augment the flow below Bluestone Dam at further sacrifice to the lower Blue Ridge Project

Reservoir could set a dangerous precedent as irresponsible and foolhardy as the idea of pollution dilution.

This concept of sacrificing one project in order to benefit another distant one has already become a never-ending vicious circle. Will a dam have to be built upstream of Blue Ridge one day to help augment its low flows? The concern should place more emphasis on what's best for the immediate project, not what it can do somewhere else for something else. If a project can coincidentally do both, fine, but this multi-purpose mentality has already ruined too many rivers and reservoirs. In this light, the omission of how this extra drawdown--or lack of it--would affect the lower Blue Ridge Reservoir decidedly ignores the most detrimental and questionable aspect of the project; moreover, it calculatedly misleads the casual observer and insults the intelligence of any informed reader.

p24/#1: The Blue Ridge project would not only augment low flows below Bluestone, but it will also permit a reduction of that reservoir's flood control storage and its pool will be maintained at a higher elevation. Bluestone is not going to augment its own flows, it is not going to be used for power. ("the construction of power-generating facilities has been deferred"--why?)

Will Bluestone be used solely for recreation? With all the talk about the power shortage crisis and the great need for the Blue Ridge Project, why isn't every available dam being used for power? How can

we believe more dams are needed when existing ones are not being used:

p24/#2: ". . . the project would replace a natural stream, located in a sparsely populated area." It would also replace a good deal of the sparse population. Staff's condescending and callous attitude towards the people of the area and their "natural stream" is nowhere more obnoxious than in this casual dismissal of the loss of that stream to this sparse population.

Our stewardship of the land has been unmatched in the East.

How unwise we have been all these years in protecting our "natural stream", enjoying its beauty and the sport it provides, using its banks and hillsides for agriculture, its tributaries for water! How much better off we would be with pools of stagnant water, drawdowns, mud flats, power pumps, transmissions lines, sirens and dams!

p25/#1: Where exactly is the power to be produced by the Blue Ridge Project needed? The only information given is "Consumers in the seven States served by the AEP System would be directly benefited, but those in much of the eastern United States would receive more reliable electric service as well as a result of interconnections." Since "From the standpoint of power production, Blue Ridge would thus have an enormously beneficial impact"---at immeasurable sacrifice to the ecology and environment of this area, where this "beneficial impact" will take place should be disclosed. The fact is, the region which has been scared

by brownouts is not served by AEP.

p26/top of page: With a 56-foot drawdown, access to the lower reservoir will be more than "relatively difficult."

p26/#2: Why must there always be water for recreation. This statement presumes that "water-oriented activity" is the only conceivable and acceptable form of outdoor recreation or entertainment.

p26/#4: After all the moaning about the present limited water-oriented activities in the area, Staff informs us that "The hearing record shows a very substantial demand EXPECTED (emphasis added) for water-oriented outdoor recreation . . ." This evidence is totally unsupported by activity in nearby dams such as Watauga, South Holston, Claytor, Summersville, etc.

It seems unlikely that one-third of the nation would drive one whole day for water-oriented activities at the Blue Ridge Reservoirs since only a few hours beyond Blue Ridge are many beautiful coastal areas in Virginia, North Carolina and South Carolina. These same coastal areas offer wonderful "water-oriented activities" but we must note their deficiency in "mountain oriented recreation activities."

p27/#1: If the Blue Ridge Project is built, Oak Hill Academy might have to relocate in Ashe County, North Carolina, but it is presently located in Grayson County, Virginia, and has been for 95 years.

p27/#2: Is Appalachian actually going to own, develop, operate and maintain the overlook areas? Will area power users ultimately be paying for these developments? Or will the overlook areas be sub-leased to a giant MacDonald's complex?

p28/top of page: "Appalachian would acquire all islands in fee, in both reservoirs, and make them available to the public." When they're under water or above it? And how many more islands "not as attractive for recreation" would be created when the lower reservoir is drawn down to elevation 2,390?

p28/#1: Appalachian is going to "donate" some 30 access points to appropriate State agencies. Therefore, the State will have to bear the cost of developing, operating and maintaining these areas without even the taxes from the land to assist them.

p28/#4: The New River is presently a "continuously navigable waterway." Staff contends that the canoe portages around the two dams "would have the EFFECT (emphasis added) of making the New River a continuously navigable waterway . . ."

p28/#5: "Releases for power generation would have a MINIMAL ENVIRONMENTAL IMPACT. They could, however, offer SOME HAZARD to recreationists in the river immediately below the lower dam at the commencement of a generating period." (Emphasis added). This environmental impact is never described or defined for those of us who

would like to judge for ourselves just how "minimal" it will be.

What is the hazard that will be "offered" to recreationists below the lower dam? How far below the dam will this hazard be "offered"?

p29/#3: Virginia and North Carolina have indicated a stable reservoir is a must for the development of state parks adjoining the proposed project. Both States set a limit of a 10-foot drawdown as "stable".

p29/#4: Water-oriented activities, according to Staff, must include an area in the proposed Virginia State Park from which one may observe the mud flats and the drawdowns.

p30/#3: Why is the Commission keeping secret what type of local zoning ordinances for shoreline control would "satisfy" them? "Such waiver could continue to apply so long as adequate local zoning laws continued to exist and to be enforced." And if they're not enforced will the FPC order the State to turn the land over to Appalachian?

p32/Top of page: "Commission Order No. 313 states that project lands and waters should be open for free public use although it accepts the imposition of reasonable fees for the use by the public of facilities provided to implement outdoor recreational use of the project lands and waters." This self-contradictory statement might be clarified by Staff

defining what they mean by "free" and "reasonable fees", but the success of such clarification seems dubious.

p32/#1: ". . . Article 19 in the Form L-4 applies to free public access to project lands and waters and provides further for a Licensee to issue permits and make reasonable charges for the development 'of access roads, wharves, landings, and other facilities on its lands.'" Article 19 also bestows upon the Applicant the right to "reserve from public access such portions of the project waters, adjacent lands and project facilities as may be necessary for the protection of life, health and property." The property they will be protecting will be their own and they will have absolute control.

p33/#1: The Applicant is predicting that the drawdown in the Blue Ridge reservoirs will be 1.5 feet in 2,000. Considering that they could not predict their own power needs for three years, it is difficult to believe they are now capable of predicting how the project will be used 27 years from now. In 1965 Appalachian applied for a license for their more modest original proposal. After intervention by the Interior Department and recommendation by Staff for the modified proposal, they applied for a license for a project twice as large as the original one. At that time they said that even if they did not have to meet the water quality storage requirement, they needed the larger reservoirs to

meet their power needs. If a power company cannot anticipate its power needs three years in advance, how can they presume to predict specific drawdowns for a reservoir in the year 2000?

Staff informs us that "The upper reservoir drawdown would be even less with no water quality control operations." On page 21/#4 Staff has said that "This environmental statement is predicated upon no storage being included in the project reservoirs specifically for the purpose of water quality control." Is the water quality issue resolved or isn't it? If it is no longer an issue--as Staff has stated-- then it cannot possibly affect the drawdown of the upper reservoir. The truth is that they hope to get the modified project built, and then put the drawdown for "flushing" West Virginia back into it.

p33/#2: Staff acknowledges that the drawdowns "would have an impact on fish and other aquatic organisms, on fishing success and on the scenic value of the shoreline". They dismiss this impact with the statement: "None of these effects should be significantly adverse, however." We first question the use of the phrase "should be". Secondly, we wonder how adverse an effect must be to be "significant"-- and to whom? And if, by chance, these effects are "significantly adverse", what recourse do we have?

p33/#3: Who is going to fund research for "vector problems" and "vector-transmitted disease" and subsequent maintenance for

"vector control measures"? Or is this another benefit the Applicant will donate to the appropriate state agency?

p34: The historical indifference and insensitivity of the Appalachian Power Company to the welfare of the individuals who will be flooded out or otherwise forced out of their homes and livelihoods does not pave the way for any post project licensing interest in relocation. Applicant's true colors are nowhere better demonstrated than in the land-acquisition practices of itself and of its wholly-owned subsidiary, Franklin Realty Company. When they acquire land, they hurriedly shoo everyone off and refuse to rent or lease. This takes the land out of agricultural production, helping to make the area's economy look bad. Taxes are less on run-down farms, too.

p35/#1: We cannot agree with the concept that this project will bring economic diversification to this area. The short-term construction of the project, with its resulting environmental disruption, can't be considered a contribution to the enhancement of the economic development of this community. No comparable development has followed similar reservoirs. There is absolutely no basis for the grand conclusion that "Construction of the project would establish a tax base in the counties affected." The question of how the counties can ever recover from the removal of 60,000 acres of land, with its farm buildings, livestock and

machinery, from the tax books, is never met. The scrupulously-avoided truth is that the counties will probably never recover, and certainly not in less than 30 years. There can be no corresponding reduction in the cost of services provided by the counties, so our taxes will have to be increased. Our taxpayers would thereby actually indirectly subsidize the project.

p35/#2: Grayson County has not been informed of the projected income or tax benefits purportedly evolving from this project. The Grayson County Commissioner of Revenue has actively sought supportive evidence to this claim and been given none.

p36/#4: "In the project area, because of the rugged topography, many of the older roads are narrow and crooked and tend to restrict traffic movement." Staff would be hard-pressed to find anyone in Grayson County who has ever been in a traffic jam.

p37/#1: "The unpleasant sounds associated with heavy construction would be heard only in sparsely populated, rural areas, several miles removed from population centers." Does Staff assume that the ears of those in sparsely populated rural areas are more jaded than those in population centers? But these "unpleasant sounds" would only last about six years--as would the pollution and siltation of the river and the destruction and disruption of vegetation in the reservoir sites.

p37-38: Re: discharge of pollutants into the atmosphere due to pumping operations: ". . . it is impossible to know what plants, in what locations, or at what times, would contribute emissions. Any power company who does not know this information prior to the construction of a project is not capable of constructing or maintaining that project.

p38/#1&2: More comforting logic: Don't be upset by the amount of coal consumed by the project since more would be consumed if the project were built differently and thus would result in strip mining. But we don't have to worry about strip mining in any case since "those who mine coal used by Appalachian will be required to comply with all applicable Federal and State mining regulations." And we are informed that any "alternative to Blue Ridge would, therefore, be likely to result in more strip-mining than would Blue Ridge." Does this mean that if an alternative plan were required Appalachian would no longer comply with all applicable Federal and State mining regulations?

p39/#3: How are these fishing benefits computed? Where is the evidence? And who would be the recipient of these increased benefits? Who will stock and maintain the fisheries?

p40/#2: "The lower reservoir COULD (emphasis added) provide a suitable habitat for a trout fishery benefits to be realized by the project, why do they now invoke the conditional "could"?

p40/#3: The proposed drawdown in the upper reservoir, according to our reading of the record, prohibits fish propagation, but of course, no one has defined "minimal adverse effect".

p40/#5: Where is the evidence that the area below the lower dam could become a trout fishery? And how far away will the water be oxygenated enough to permit this? How many fish will die before reaching the properly oxygenated portion of the river?

p40-41: By the time the water "reaches Bluestone Dam it will have warmed sufficiently to provide optimal water temperatures for the important species of game fish found there." Is this as opposed to the "unimportant" species of fish found here in Grayson?

p41/#3: Re historic sites: It might be observed in passing that the one million year old New River is of historical value and should not be replaced and destroyed by a dam whose benefits are often proclaimed but never enumerated.

p42: First we are informed that "precise routings (of transmission lines) have not been determined, . . . but there is sufficient information concerning routing to permit an assessment of the environmental implications of these lines." Then we are assured that "the adverse environmental effects of the transmission lines should be reduced to the fullest feasible extent."

We are glad Staff recognizes that "inundation of the project lands would terminate their present uses". Can they recommend any substitutes?

p43/#6: "However, it should be noted that the air pollutants resulting from the Blue Ridge Project would be less than those created by an alternative steam electric generating plant" (and more than those created by NO plant) "and also, the population increases in the project area would themselves create people-induced pollution." The more pollution the merrier?

p43/#7: Transmission "lines and towers would be designed and placed to minimize their intrusiveness . . ." Will they be designed to simulate trees, flowers, mountains, streams or groundhogs?

p45/#1: There have been no "brownouts in recent summers" in Virginia. Again--where is this power needed and where is it going?

Previously we have been told that power production at Blue Ridge will continuously decrease in the future, now we are told that all of the production of Blue Ridge would be "essential and, in fact, would meet only a small part of the foreseen future need." Is the project needed and going to be used to its full capacity or isn't it?

p46/#2: Staff is saying that because of the cost and "increased burden of time" required to study alternatives to the Blue Ridge Project--

we're stuck with what we've got. It is incredible that the Staff of the agency which licenses these projects can make such a statement.

It has been said before, but bears repeating, that Applicant and the various government agencies have failed to honestly and fairly present this project to the people of North Carolina, West Virginia and Virginia, and no open, frank and full disclosure had been made of all its implications and consequences.

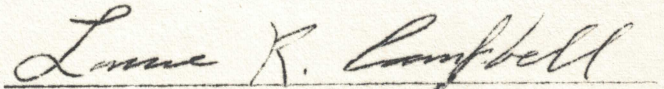
When a representative of Applicant makes a public statement that the long range purpose of the project is the installation of a nuclear power plant--then later denies it, it is no wonder the people of these counties feel the mistrust they do. When Applicant tries to coerce the Grayson County Board of Supervisors to sign an agreement for a set tax rate on a project that has not yet been licensed or built, we can understand their lack of faith in the post-license promises made.

p59/#2: As a condition of the license, the Licensee can make no substantial change in the project without approval by the Commission. Why is there no provision for other parties to object to changes in the license?

pll9: This chart of cost and benefits of the project is misleading and totally unexplained. Applicant, of course, bears the cost and receives the benefits from the power facilities, and it is assumed that

all other costs and benefits listed are those of the State(s). For a closer look at the "benefits" as they actually are, see Appendix A.

The other appendices contain some recent information about the economy of our area. They are included here to refute all that great body of propaganda about our economy. Compare, for instance, p18/#1 with Appendix F. We discredited Applicant's Exhibit No. 277, the basis of Staff's data, in the hearings two years ago.



Lorne R. Campbell
Of Counsel



Edmund I. Adams
Of Counsel

APPENDIX A

TOTAL ANNUAL COSTS
of project
\$36,727,550

TOTAL ANNUAL BENEFITS
of project
\$43,524,300

Subtracting the total costs from the total benefits we arrive at \$6,796,550 as the annual benefits to be realized from the project. Now let us take a look at the costs and benefits of the power facilities:

TOTAL ANNUAL COSTS
of power facilities
\$27,863,000

TOTAL ANNUAL BENEFITS
of power facilities
\$37,112,000

Subtracting the costs of the power facilities from the benefits, we see that Applicant will benefit \$9,249,000 from their power facilities.

The total benefit for everything - - including Applicant's power facilities is only \$6,796,550. When we subtract the Applicant's total annual benefits from the project's total annual benefits, we are left with a DEFICIT of \$2,452,450.

\$6,796,550 TOTAL ANNUAL PROJECT BENEFITS
- 9,249,000 TOTAL ANNUAL BENEFITS OF POWER FACILITIES
- \$2,452,450 TOTAL ANNUAL BENEFITS OF PROJECTS
EXCLUDING POWER FACILITIES

APPENDIX B

ANNUAL COSTS AND ANNUAL BENEFITS

	Annual Costs	Annual Benefits
<u>Power Facilities</u>	\$27,863,000	\$37,112,000
subtotal	27,863,000	37,112,000
	\$9,249,000	Annual realized benefits from power facilities.
<u>All other Projects</u>		
Recreation	2,747,000	6,112,000
Fish		92,600
Wildlife	13,750	
Roads and Bridges	6,104,000	(Net Gain)
<u>Downstream-Project Induced</u>		
Recreation		(Net Gain)
Trout Fishery		116,700
Wildlife		
Flood Control		91,000
Low-Flow Augmentation for Fish and Recreation		
Navigation		(Net Gain)
subtotal	\$8,864,750	\$6,412,300
	-\$2,452,750	Annual benefits other than power benefits.
Total	\$36,727,750	\$43,524,300

APPENDIX C

ASHE COUNTY ECONOMIC DATA

1. Population..... 19,571
2. Income from Agricultural Production
 - 1954.....\$3,162,000
 - 1964..... 9,800,000
 - 1972.....13,225,000
3. Industrial Employment

	<u>Number of Employees</u>
1969.....	1,846
1970.....	2,300
1971.....	2,315
1972.....	2,500
(Feb) 1973.....	2,910

1972 Industrial Payroll exceeded \$15,000,000
4. Gross Retail Sales
 - 1959.....\$11,408,089
 - 1962..... 14,259,269
 - 1965..... 17,237,064
 - 1968..... 20,068,293
 - 1970..... 25,116,405
 - 1971..... 26,380,952
 - 1972..... 30,952,118

5. Bank Deposits

1970.....	\$24,804,394
1971.....	29,441,414
1972.....	34,008,732

6. Savings & Loan Deposits

1970.....	2,964,402
1971.....	3,243,802
1972.....	3,856,817

APPENDIX D

BANK DEPOSITS AT INDEPENDENCE, VIRGINIA

1965.....5.2 million

Now.....16.1 million

BANK DEPOSITS AT SPARTA, NORTH CAROLINA

1965.....5.2 million

Now.....17.3 million

SAVINGS & LOAN ASSOCIATIONS AT SPARTA, N. C.

1965.....None

Now.....2.7 million

APPENDIX E

SOME INDUSTRIES IN VICINITY OF UPPER RESERVOIR SITE

GRAYSON COUNTY

	NUMBER OF EMPLOYEES	SQUARE FEET FACTORY SPACE
GRAYSON GARMENT	1965 135	35,000
Independence, Va.	Now 450	69,000
ANVIL BRAND, INC.	1965 200	36,000
Independence, Va.	Now 500	122,000
INDEPENDENCE INDUSTRIES		
Independence, Va.	142	30,000
MR. CASUALS		
Elk Creek, Va.	389	64,000
Troutdale, Va.	255	64,000
PENRY MFG. CO.		
Grassy Creek, N. C.	73	25,000
(Construction and expansion to be completed in July; increase to 250 employees)		
AMERICAN SCREW CO.	45	
Elk Creek, Va.		
(Will increase to 90 when training program is complete. Goal is 250 employees)		

ALLEGHANY COUNTY

		NUMBER OF EMPLOYEES	SQUARE FEET FACTORY SPACE
HANES KNITTING	1965	341	50,000
	Now	294*	50,000

*Loss due to competition from other plants in area. Would hire up to 350 if suitable applicants available.

BLUE RIDGE SHOE	1965	None	None
	Now	298*	84,000*

*Presently expanding to 350 employees and 10,000 square feet factory space.

SPARTA PIPES*	1965	305	63,000
	Now	290	75,000

*Plans to construct a new plant have been made.

TROUTMAN SHIRT CO. (3 Plants)	1965	500	46,000
	Now	450*	78,276

*Loss due to competition from other plants in area. Would hire 500 if qualified workers were available.

APPENDIX F

AGRICULTURAL EXTENSION SERVICE
NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

SCHOOL OF AGRICULTURE AND LIFE SCIENCES

Address reply to:
County Extension Office
P. O. Box 7
Sparta, N. C. 28675
372-5597

March 7, 1973

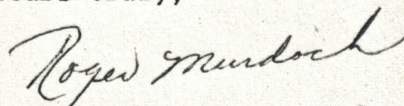
Mr. Edmund I. Adams
Attorney of Law
Sparta, N. C. 28675

Dear Mr. Adams:

We have made the enclosed report of the number of people involved and total acreage being effected by the proposed dam.

At the present time this would effect approximately $\frac{1}{4}$ of our total burley tobacco producers. At the present value of cropland solely, this would amount to about \$9,582,300. The total grass farm products value would be, at the present existing prices, about \$2,000.000.

Yours truly,



Roger Murdoch
County Extension Chairman

RM:kr

Enclosure



	Total Acreage	Cropland (24%)	Pasture (38%)	Tobacco (<i>Cunds</i>)	Feed Grain (2%)	Woods (36%)	Value
G. C. Crouse	73	24	55	828	2		
Dick Doughton	375	113	174	1370	25		
Elton Boyer	114	25	62	1365	5		
George R. Crouse	701	181	116	1623	24		
J. C. Gambill	677	159	250	1245	5		
J. R. Gambill	561	116	227	3200			
Cleve Gambill	326	91	156	1662	21		
Jess Moxley Estate	247	89	137	1241	13		
Russell Moxley	109	16	73	1146			
G. C. Reeves	175	24	100	1445	5		
J. F. Sexton	33	14	2		4		
Willie Joines	86	43	37	1046	2		
Alex Woodruff	231	49	178	1194	5		
Sam Maines	7	5		997			
Arno Maines	21	5	16	1082			
Wanda Truitt	28	5	11	971			
Edwin Maines	240	47	100	1174	9		
James Estep	40	3			3		
Blanche Halsey	100		99				
Homer Rector	205	57	106	1632	11		
Arvil Muenay	100	16	46	784			
Bays Hash	160	7	136	2275	4		
J. Carl Cox	71	27	44		5		
John Mc Edwards	175	36	93	1152	3		
Paul Crouse	90	45	30		5		
Jr. Edwards	71	39	25		3		

	Total Acreage	Cropland	Pasture	Tobacco	Feed Grain	Woods	Val
Rudolph Edwards	222	124	67		7		
Clive Edwards	192	57	101		6		
Don Wooten	132	29	42		4		
Lee Gentry	115	51	39	699	4		
Oddie Spurlin	62	9	18				
W. W. Galyen	29	7	22				
Kelly E. Royall	76	18	32		4		
Abie Montgomery	101	29	34				
Redell Jarvis	20	4	2				
A. E. Reid	90	35	42				
Lola Jarvis	146	12	26		4		
Eva Jarvis	63	18	31		3		
Roy Martin	46	6	23				
H. C. Douglas	22		21				
Bill Hawks	42	9	10		1		
Herbert Todd	74	27	17		3		
Thurmond Fitzgerald	88	14	21	1046			
L. K. Halsey	563	91	215	1684	7		
Sam Halsey	283	45	62	1255	4		
Lena Jenkins	85	10	39	1575			
Lavie Moxley	26	17		1122			
Hazel Burchette	10	3	7	350			
Clyde Burchette Est.	9		5				
Thomas Zackary	46	5	23	892			
Franklin Realty Co.	597	87	86				
James Smith	414	102	132	1716	7		

	Total Acreage	Cropland	Pasture	Tobacco	Feed Grain	Woods	Value
Jean Hunter	123	13		1242			
Lee Little Estate	53	7		537	1		
Paige D. Scott	60	10	35	1101	4		
Franklin Realty Co.,	91	35	42	1391	5		
Ray Halsey	6	4	2				
S. L. Phipps Est.	177	38	60	1500			
Clinton Busic	213	50	110	1427	2		
Guida Boyes	191	55	101	2043	2		
E. W. Douglas	124	75	35	1495	5		
Blake Hampton	312	95	152	2321	2		
H. V. Douglas	81	6	36	856			
Graham Pugh	40	7	25	1165			
Sidney Sturgill	43	24	8	1336	3		
Ruth Sturgill	106	17	43	1336	3		
Glenn Bare	22	2	18	400			
Doris Triplett	24	8	11	1250	1		
A. V. Choate	367		200				
Gerald Atwood	41	9	5	526	2		
Cary Wagoner	262	73	55	1201	8		
Dean Adams	39	16	20	899			
Howard Roupe	14	1	9				
V. B. Phipps	248	65	152	1522			
Gypsy Stallings	39	4	14	932			
Delbert Kennedy	47	31	12	3358	1		
Clarence Kennedy	84	51	14	3092	3		
Ruby Wiles	7	4		748			

	Total Acreage	Cropland	Pasture	Tobacco	Feed Grain	Woods	Value
Jackson Paisley	86	12	10	1073	3		
Lianey Blevins	116	25	29	2270	1		
Maxine Parsons	147	58	58	1199			
Bessie Moxley	142	15	47	918			
Dwight Baldwin	88	20	50	884			
Carl Parsons	97	27	30	1073	1		
Kyle Cox	82	15	33	877	1		
Russell Rutherford	114	46	37	1686	8		
Cleo McMillan	92	18	40	1497			
Raline Osborne	130	48	24	829			
Hugh Hash	187	102	93	1576			
Lennie Anders	47	22	21	1849			
Franklin Realty Co.	100	17	29	767			
O. E. Moxley	77	14	36	1321	1		
Delia Pugh	68	11	19	1265	3		
T. E. Pugh	104	43	13	1187	1		
Lena Black	50	15	25	1337			
Dent Pugh	58	20	27	2005			
Alan Blevins	21	9	0				
Ruth Perry	60	12	23	1320			
E. K. Templeton	287	42	89	1247	3		
Luna Weaver	25	6	16	748			
Charles Wingler	16	4	9	401			
Donald Sturgill	29	6	4	1246			
Fred Hill	22	4	3	850			
Maggie Williams	33	8	9	1072			
Ben Sturgill	28	3	15	618			
	13,689	3,367	5,318	100,561	272	5,004	

\$ 9,582,300 - Totals
\$ 2,000,000

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL POWER COMMISSION

Appalachian Power Company)

Project No. 2317

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Section 1.17 of the Rules of Practice and Procedure.

Dated at Sparta, North Carolina, this 5th. day of April, 1973.



Edmund I. Adams
Of Counsel