

Federal Energy Regulatory Commission
Honorable Debbie-Anne A. Reese, Secretary
Office of Energy Projects
888 First Street, NE, Room 1A
Washington, D.C. 20426

Subject: Dominion Energy's Response to Lake Gaston Weed Control Council Comments on the Project No. P-2009 Shoreline Management Plan - Specifically Resourcing and Leadership Requirements

Dear Secretary Reese:

The Lake Gaston Weed Control Council (LGWCC) requests the Federal Energy Regulatory Commission's (FERC) assistance in regard to the Council's efforts to work with Dominion Energy (DE) in support of aquatic vegetation management on Lake Gaston (LKG). These efforts have focused recently on the five year review of the DE Shoreline Management Plan (SMP) for FERC project No.2009 and comments regarding:

- The need for annual financial support from DE, at a minimum consistent with funding from each of the five Counties surrounding the Project, for management of invasive, noxious and nuisance aquatic vegetation/algae within the Project's boundaries.
- DE needs to take a stronger leadership role in promoting the partnership among all stakeholders via the Pete Deschenes Lake Gaston Stakeholders Board or other similar group.

In several instances DE did respond to our comments and took action to address them in the revised draft SMP, however the two significant comments noted above were never adequately addressed during our interactions with DE personnel located at LKG. I would like to emphasize that over the years the LGWCC has worked hard to maintain a good working relationship with the local DE staff at LKG.

The LGWCC, a volunteer organization, has been the leader in managing aquatic vegetation/algae at LKG since 1985. In that time much has been achieved through the work of the partnership and those stakeholders that have contributed significant financial and other resources towards the effort. We are aware of letters sent to the FERC from the five counties that have historically provided a large share of aquatic vegetation/algae management funding, and wholeheartedly support their request that DE do the same as the owner and operator with responsibility for environmental conditions and outcomes within the defined Project . In addition, the Lake Gaston Association (LGA), has provided thousands of volunteer labor hours and expertise in carrying out activities in support of aquatic vegetation management. The LGA, a key partner with the LGWCC, has also sent you a letter expressing concerns with SMP including inadequate DE support and leadership for aquatic vegetation/algae management and we support their points as stated in their letter. Finally we are aware that other elected officials representing the region, both in Virginia and North Carolina are supportive of our concerns and may reach out to you or your staff.

It is our position that the current DE SMP for LKG is inadequate with regard to aquatic vegetation management in light of past, existing and expected future environmental conditions. In some cases the creation of the reservoir impoundment has created conditions for aquatic vegetation/algae that has the potential to impact the ecosystem balance. One example of this is the increase in cyanobacteria over the years and the effort to bring it under control in LKG. Another, as the result of the current drought in the region, is the explosion of other vegetation in the lake this year resulting from changing weather and operational conditions. While DE may not be able to address all of the impacts on their own, they do need to step up, both financially and with leadership and help manage the overall effort to minimize negative impacts. The FERC requirement for an aquatic vegetation management plan at Smith Mountain Lake (Project No. 2210-192) is a good example of how the owner operator of the Project (in this case Appalachian Power Company) is taking the leadership and financial role to address the problem. We would expect the same from DE at LKG.

We appreciate your time and effort related to this matter and look forward to the Commission's response. We stand ready to have further discussions with your staff and DE at the appropriate level where decisions can be made to resolve our concerns to the satisfaction of all involved.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Elton H. Brown, III". The signature is fluid and cursive, with a prominent "E" and "B".

Elton H. Brown, III
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