
APPENDIX 1
Conowingo Pond Workgroup Input

Appendix 1

Conowingo Pond Workgroup Input

This appendix contains information on the Conowingo Pond Workgroup (the Workgroup) and the important role played by its members. The Workgroup was formed in 2002, at the request of the Susquehanna River Basin Commission (the Commission), to both represent the interests of key stakeholders in the operation and use of the pond and to provide direction, oversight, input, and review for the planning effort and its results. Workgroup members represented federal and state agencies, local jurisdictions, power companies, public water supply purveyors, special interest groups, and the Commission.

Many members of the Workgroup were active in the planning effort. The Workgroup met 17 times from April 2002 to January 2006. These meetings provided the participants opportunities to be actively involved in the complete planning process, including technical analyses, resolution of issues, development and evaluation of alternative management measures, selection of the recommended plan, and preparation of the Workgroup report. Attendance at the 17 meetings by members representing the diverse groups on the Workgroup was consistently good, as shown in the summary of meeting attendance presented below.

In addition to participating in Workgroup meetings, the members were requested to review and comment on planning results, initial drafts of the Workgroup report, and other material provided by the Commission. Members were also requested to provide data and other input needed to accomplish technical analyses and evaluation of alternative plans. An input item provided was a discussion of Workgroup members' particular interests in the resources, use, and operation of the Conowingo pond. The discussion of interests follows the listing of meeting attendance below and a summary of the interests, by topic, is included in Section III-A of the main report.

Finally, Workgroup members were requested by the Commission to provide letters of support for the recommended management plan, Automatic Q-FERC + 1,000. The Commission's letter of request, dated November 1, 2005, which was sent to all Workgroup members, and responses received are included at the end of this appendix. At the January 26, 2006, Workgroup meeting, the members in attendance reaffirmed their support for Automatic Q-FERC + 1,000.

The *Conowingo Pond Workgroup Report* was finalized in March 2006, and documents the analyses and results produced under the general oversight of the Workgroup. The Workgroup's report then served as the basis for the Commission's report on the Conowingo Pond Management Plan.

Conowingo Pool Workgroup Meeting Attendance Summary

Organization	2002				2003				2004			2005				2006	
	4/16	6/4	10/1	12/4	3/4	6/3	8/19	11/6	1/6	6/23	9/16	1/20	4/6	5/24	7/12	10/11	1/26
Audubon PA				X													
Cecil County		X															
Chester Water Authority	X	X		X	X	X	X	X	X					X			
City of Baltimore	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Havre de Grace		X	X	X	X	X	X	X		X		X	X			X	
City of Lancaster																	
Conectiv Mid Merit	X	X							X	X			X		X		
Exelon/Susquehanna Electric	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
FERC	X	X															
Harford County	X	X	X	X			X	X	X	X		X	X	X		X	X
Lancaster County	X	X	X	X	X	X		X						X			
Lower Susquehanna Heritage Greenway	X																
MDE	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X
MDNR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NYSDEC																	
PADEP	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
PFBC	X									X		X	X	X	X	X	
PPL Generation	X		X	X	X	X		X	X		X	X	X	X			X
Safe Harbor Water Power	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SRBC	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Town of Perryville																	
USFWS										X	X			X		X	
USACE		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
USEPA																	
USGS	X					X											
York County	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
York Water Co.	X			X	X	X											

Workgroup Interests

1. **Cecil County, Maryland** – The Board of County Commissioners of Cecil County is interested in the management of the Conowingo pond. The Board has an interest in securing future water allocations from the Commission and Maryland Department of the Environment to meet the growth objectives as described in the County Comprehensive Plan.

The Board of County Commissioners appointed a “Water and Wastewater Task Force” in September 2004, to look into the provision of water and wastewater infrastructure in the designated growth area. The Task Force’s report and recommendations to the County Commissioners have recently been finalized. Among the report’s implementation recommendations is that the Susquehanna River be investigated as a water source through the utilization of intake points at the facilities in Perryville and Perry Point. These sources could supply water in an easterly direction along U.S. Route 40 to supplement water supply within Cecil County’s growth corridor.

The Board of County Commissioners has made the effort to reach out to the municipalities in a spirit of cooperation to secure a supplemental water source for the County’s growth corridor. The County is looking towards the establishment of multiple water sources and to establishing interconnections between the existing systems. It is the intention of the Board of County Commissioners to work closely with the Commission and the Maryland Department of the Environment on these initiatives.

2. **Chester Water Authority** – The Chester Water Authority withdraws water from the Conowingo pond to augment its primary Octoraro Reservoir source of supply in times of drought, to dilute elevated nitrate levels or otherwise offset poor water quality conditions in the Octoraro Reservoir, and to satisfy the conditions of Chester Water Authority’s allocation permit for withdrawals from the Conowingo pond. The station capacity for transmitting water from the pond with 1 pump running is approximately 17 mgd and with 2 pumps running, 30 mgd. The pumping station is frequently used during off peak (electrical) periods to minimize electrical costs. However, when the station is needed due to poor Octoraro water quality or sustained drought, it is operated continuously.
3. **City of Baltimore** – Although in the past, the Susquehanna River source may have been viewed as an alternative source for two of the City’s three reservoirs (Prettyboy and Loch Raven Reservoirs in the Gunpowder River Watershed), the operation of this source, or lack of operation, is not based on availability of water from the river, but rather on water quality and economic considerations. Unlike the City’s three raw water reservoir sources that flow to the treatment plants by gravity, the Susquehanna River source requires pumping, at a considerable operating cost. The waters of the river, with turbidity substantially higher than that of the City’s Gunpowder reservoirs,

necessitate additional chemical treatment costs and result in water treatment-generated residuals.

It is expected that, in the future, the Susquehanna River source will become more of a primary raw water source for the daily demands of the Baltimore metropolitan region. With recent heightened concern for security, the Susquehanna River source, as well as the existing raw water reservoirs, now must also be viewed as contingent sources to meet water demands during times of national crisis, or resulting effects caused by intentional disruptions to the water supply.

Management of the Conowingo pond resource is a significant and ongoing concern of Baltimore and other jurisdictions that are served. To that end, an equally significant concern is the management of the water resources in the river upstream of the Conowingo pond. As water resources are consumed along the river, there is a direct effect upon the pond. This will require an ever-changing operating plan, if we are to reasonably meet all demands placed on the pond. However, an unstable pond operating plan will, in itself, impact current stakeholders and their long range planning activities.

Toward those ends, the City has become concerned over docket approvals by the Commission for increased withdrawals upstream of the pond. For example, continuous, unabated awarding of increased consumptive use licenses anywhere upstream of the Marietta gage may result in sooner, and more frequent, FERC trigger flow events, during low flow periods.

The Commission faces a challenging, and almost insurmountable, task of balancing the competing demands for the resources of the river. The Commission should look beyond completion of the Conowingo pond Workgroup program, if the resulting pond operating plan is to have a meaningful lifespan. As modeling demonstrates, resources in the pond barely satisfy the needs of the current stakeholders, projected demands, and environmental concerns. As such, the City hopes that the Commission will strive for a basinwide approach to the Conowingo management program.

4. **City of Havre de Grace, Maryland** – The City of Havre de Grace is interested in the management of the Conowingo pond from a number of different perspectives. The Conowingo pond feeds the Susquehanna River which borders Havre de Grace and provides for recreational and commercial boating, fishing, crabbing, and sea plane operations, as well as a water supply for our citizens and surrounding areas. Obviously, the City wants to work together with other stakeholders to protect and preserve this most valuable resource.

Currently, the City has a water withdrawal permit for 10 mgd from the Susquehanna River. The intake for the City is exposed to a tidal influence when the dam discharge falls below 4,000 cfs. This can impact the water quality through a rise in salinity. If severe, the water would be usable only for sanitation purposes, not for drinking, and would shut down a bottling facility. Low flow through the dam also impacts a local

manufacturing facility and its ability to discharge under a National Pollutant Discharge Elimination System (NPDES) permit to the Susquehanna River. Thus, the possibility of closing or reducing operations at two large employment centers can be at risk. Impacts on the Upper Chesapeake Hospital (Harford Memorial) could also be severe.

Storage of water within the basin and in reservoirs within each system is vital to the ability to supply potable water during periods of drought and should be a requirement of systems prior to an increase in allocation being granted.

5. **Exelon Generation** – Periods of drought or extended periods of low flow can adversely affect the ability of the dam to meet minimum flow and summertime pond level minimums. In addition, due to high ambient and water temperatures and low flow, maintaining the minimum dissolved oxygen requirement is also challenging. These situations can further be compounded if the flows coming into the pond as measured at the Marietta gage do not equal the flow outfalls. This not only affects the dam, but also the water supply companies and Peach Bottom Atomic Power Station due to the loss of pond level. Additionally, recreational boating and marina operation becomes severely hampered due to low water levels.

A hopeful resolution to these issues would be an automatic minimum flow waiver, if drought and/or low flow conditions are experienced, with a leakage allowance. It would also be advantageous to have a better indication or match of actual flow into the pond versus the Marietta gage. This would allow time to preserve the existing pond level and hopefully maintain minimum flow and summertime minimum pond level requirements. This would also serve to preserve continued water use by water suppliers and the Peach Bottom facility.

6. **Harford County, Maryland** – Harford County is interested in the management of the Conowingo pond from a number of different and diverse aspects. The pond borders the northeast boundary of the County. The pond provides recreational activities, fish and wildlife, hydroelectric power, and water supply to the citizens of the County and surrounding areas. The County is interested in working together with other stakeholders in order to protect and provide for adequate water resources now and in the future.

The Conowingo pond is the present and future to the County with respect to providing a safe and adequate drinking water supply. Currently, the County has an executed agreement with the City of Baltimore to receive up to 20 mgd through its withdrawal from the pond. The County has an option for an additional 10 mgd withdrawal allocation from the City, for a total of 30 mgd, and is hoping to secure this 10 mgd at the conclusion of the Conowingo study. It is expected that the City's additional peak day withdrawal request can be adjusted upward. In addition, the County needs to plan for additional drinking water to Aberdeen Proving Ground – Edgewood Area and to allow future economic development in and around the County's existing development envelope. For the 50-year planning period, the

County anticipates it will require up to a 40 mgd allocation of the City's withdrawal from the Conowingo pond. The pond will become the County's main resource for providing drinking water to the growing County during all seasons, both drought and wet weather times.

Currently, Harford County is unable to secure additional withdrawal allocation from Baltimore City due to the City's limited peak day withdrawal conditions under their existing permit. Hopefully conflicts between existing permits and improved management of all of the basin's resources can be resolved so that Baltimore City can receive an increase withdrawal permit, where in turn the County would be able to secure additional flow.

Managing the pond efficiently and cooperatively between all parties involved should be the number one goal of the Workgroup. Through cooperative management, surrounding areas should be able to overcome existing conflicts.

7. **Lancaster County Planning Commission** – The Lancaster County Planning Commission recognizes the importance of the collaborative planning efforts of the Commission, the states of Maryland and Pennsylvania, the surrounding counties, and the electric and water utilities in developing and implementing the Conowingo Pond Management Plan.

Lancaster County public water suppliers do not draw from the Conowingo pond; however, both the City of Lancaster and the Columbia Water Company have intakes upstream at Columbia.

The lower Susquehanna River is an important natural, scenic, and recreation resource for Lancaster County. The recently established Susquehanna River Water Trail – Lower Susquehanna Section extends 53 miles from Harrisburg, Pennsylvania, to the Mason Dixon Line, encompassing the Conowingo pond. The Lancaster County Planning Commission, on behalf of the Lancaster-York Heritage Region, has developed and printed the Susquehanna River Water Trail – Lower Section (Pennsylvania) Map & Guide to facilitate the exploration of this stretch of the Susquehanna River.

The Holtwood Environmental Preserve is located on the northern end of the Conowingo pond. The Preserve includes a nationally recognized wildflower preserve, museum of Native American artifacts, and networks of hiking trails. The Kelly's Run-Pinnacle Trail and Urey Overlook Trail lead to spectacular scenic vistas overlooking the Susquehanna River.

The Conowingo pond/Muddy Run area is an Audubon-designated Important Bird Area where 250 species of birds have been identified. The Conowingo pond provides important wildlife, fish, and plant habitat; recreational opportunities such as fishing, boating, and wildlife watching; and hydroelectric power to the residents of Lancaster County and surrounding areas.

The Conowingo Islands below Holtwood dam at the northern end of the Conowingo pond are considered a highly significant area by the Nature Conservancy for maintaining biological diversity in Pennsylvania. There are state-endangered, threatened, and rare species in the Riverside Cliff/Outcrop natural community located here. The islands provide nesting and roosting sites for bald eagles and osprey.

The Lancaster County Planning Commission recognizes the need for all parties involved in the Workgroup to work together to ensure the implementation of the management plan. Managing the pond efficiently and effectively will require the continued cooperation of the key stakeholders in the pond.

8. **Maryland Department of the Environment** – The Maryland Department of Environment (MDE) is the lead environmental regulatory agency in Maryland, and as such is responsible for managing Maryland’s water resources, protecting public drinking water supplies, and preserving water quality of the state’s water resources. As a result, the Conowingo pond is of significant interest to MDE.

Deterioration in water quality, caused by either reductions in flow or other factors, can result in serious implications for drinking water. Inferior water quality increases the complexity and cost of water treatment, and can ultimately compromise public health. Maintaining the best possible quality for sources of public drinking water is the primary goal of MDE’s Source Water Protection Program and is considered critical to meeting the goals of the federal Safe Drinking Water Act, for which MDE has primacy.

Discharges from the Conowingo pond comprise about 50 percent of the flows into the Chesapeake Bay. The Bay is North America’s largest and most biologically diverse estuary, and contributes significantly to Maryland’s economy, in addition to providing irreplaceable recreational opportunities for the state’s citizens. Therefore, maintaining sufficient flow and quality for waters entering the Bay is critical to ensuring the health of the Bay and preserving the benefits engendered to the state. MDE is responsible for implementing total maximum daily loads (TMDLs) for Maryland’s waterways, an effort that depends on maintaining and/or improving water quality in the tributaries that feed the Bay, including the Susquehanna River. As signatory to the 2000 Chesapeake Bay Agreement, Maryland is committed to restoring water quality in the Bay, and the health of the Susquehanna is critical to this mission.

Discharges into the Susquehanna River from a number of industrial and other wastewater facilities are regulated by the MDE. Sufficient flow is required in order to adequately dilute these discharges. In addition, the Susquehanna River system is vital to maintaining the health of wetlands in the region surrounding the river, which are regulated under MDE’s Wetlands and Waterways Program.

9. **Maryland Department of Natural Resources and Pennsylvania Fish and Boat Commission** – Restoration of American shad and other migratory fishes in the Susquehanna River has been underway for more than 30 years. Fish passage facilities are now in place at all four of the lower Susquehanna River hydroelectric projects. Uses of the Conowingo pond must not compromise the success of upstream passage of adult shad during April through June, and downstream movement of juveniles from September through December. Minimum flows below Conowingo dam during April through June are of particular importance to maintenance of good water quality and the aquatic resources present in that habitat. Under full anadromous fish restoration, the 3-mile river reach below Conowingo dam is expected to host up to 3 million American shad and 15 million river herring, and it is currently utilized by large populations of white perch, gizzard shad, carp, suckers, American eels, striped bass, and other species. Current FERC-ordered minimum flows, which vary by season, were established to provide protection for these fishery resources, with highest minimum flows required during the anadromous fish migratory period in spring, and intermittent flows permitted only during the winter, when fish populations present are limited. Long-term studies demonstrated that intermittent winter flows were sufficient to maintain the wetted surface area needed to maintain macroinvertebrate production. It may be necessary to reassess spring minimum flow requirements when anadromous fish stocks are fully restored to ensure that habitat and water quality (oxygen) are sufficient to meet the needs of those enhanced populations.
10. **Pennsylvania Department of Environmental Protection** – The Pennsylvania Department of Environmental Protection seeks to protect the broad range of multiple uses the Conowingo Pond supports. Protection of all withdrawal and non-withdrawal uses must be balanced. Withdrawal uses include not only existing withdrawals, but also potential future withdrawals, whether they be by new users or increases by existing users. Non-withdrawal uses include existing and projected future aquatic resource needs, recreation and hydropower, in and below the Conowingo Pond. Instream flow protection measures must be adequate to protect aquatic resources below the dam, as well as the seasonal migratory needs of anadromous fish species.

The needs of all users must be accommodated in a plan that addresses the impacts of changing hydrologic conditions and growing withdrawal and consumptive uses throughout the Susquehanna River Basin. The plan should recognize the benefits of water conservation and efficiency of water use, particularly during periods of low flow in the river. At its core, the plan should provide a streamlined mechanism for protecting all essential uses during critical low flow periods, including, if necessary, a provision for automatic waivers, whereby leakage through the dam could be temporarily credited toward the conservation release requirements. Any such waivers, however, must serve to protect essential uses, rather than to enhance the economic benefits of the operators of the Conowingo hydropower project.

11. **Susquehanna River Basin Commission** – The Commission has the broad authority and responsibility to take a lead role in managing water resources in the Susquehanna

River Basin. Article 3.5 of the Susquehanna River Basin Compact (Compact), enacted in 1971, contains the duties of the Commission. Specifically, Article 3.5.1 states the Commission shall: “Develop and effectuate plans, policies, and projects relating to water resources; adopt, promote, and coordinate policies and standards for water resources conservation, control, utilization, and management; and promote and implement the planning, development, and financing of water resources projects.” Article 3.5.3 calls for the Commission to: “Administer, manage, and control water resources in all matters determined by the commission to be interstate in nature or to have a major effect on the water resources and water resources management.” The duties cited in both Articles 3.5.1 and 3.5.3 relate to the development of the Conowingo Pond Management Plan.

A critical and long-term part of the Commission’s mission, as reflected in the 1971 Compact, is the achievement of a balance between environmental, human, and economic needs in the management of the basin’s water resources. The alternatives considered and the recommended management plan formulated by the Workgroup had, as a primary goal, the balancing of economic development, environmental protection, and provision of water supplies. This was achieved by carefully considering sustainability of the resources, protection of existing users, potential adverse environmental impacts and actions to minimize the impacts, protection of high quality water from degradation, and effective interagency coordination.

In view of the duties and mission discussed above and in response to the 2001 settlement agreement with the City of Baltimore (see Section I-A of the main report), the Commission has had a long-term interest in resolving water resource issues at the Conowingo pond. The Commission recognizes the importance of a cooperative effort by the key stakeholders in the pond. Voluntary, long-term participation in the implementation of the Conowingo Pond Management Plan by the stakeholders is the Commission’s goal.

12. **U.S. Army Corps of Engineers** – Changes to operational policies at the Conowingo pond along the lower Susquehanna River do not directly affect Corps of Engineers’ projects or water control responsibilities. However, the Corps of Engineers does have an interest in how the Conowingo pond system is managed, both seasonally and long term. This interest stems from proposals, by others, to use releases from upstream Federal reservoirs to mitigate the adverse effects of low streamflows on the pond.

Only two (Cowanessque and Curwensville Lakes) of the Corps of Engineers’ 14 reservoirs in the Susquehanna River Basin are presently authorized for water supply storage. Releases from either project may be initiated when flows at key stream gages along the Susquehanna River drop below Q7-10 target values. These target values, though, were established prior to the heightened concern about the Conowingo pond. Currently, neither project is regulated specifically for the purpose of managing the Conowingo pond.

The Commission has proposed an investigation of low flow management throughout the Susquehanna River Basin. This effort would include a reexamination of the approved operating plans for Cowanesque and Curwensville, as well as an examination of operational changes at other Federal reservoirs. One objective of the investigation would be to determine if additional releases from these reservoirs could be provided to the Conowingo pond during low flow periods. Effects of these additional releases on the Federal reservoirs are unknown at this time.

13. **U.S. Fish and Wildlife Service** – U.S. Fish and Wildlife Service has many interests in management of the Conowingo pond including, but not necessarily limited to:
 - a. Relicensing of Conowingo, Muddy Run and Peach Bottom;
 - b. General health of living resources in the pond and in Conowingo’s tailwaters;
 - c. Impacts of Conowingo hydropower generation schedule on downstream resources;
 - d. Anadromous fish restoration and safe upstream and downstream passage of fish (especially diadromous species including eels); and
 - e. Impact of water development projects on aquatic resources (e.g., egg and larvae impingement at water intakes, streamside development, endangered species issues).

Description of fish and wildlife resource issues:

- a. Aquatic resource issues of particular concern to the U.S. Fish and Wildlife Service relate what we call our trust resources – interjurisdictional diadromous species, migratory birds, threatened or endangered species, unique habitats (e.g., wetlands), and federal project review, including FERC and NRC licensing, under the Fish and Wildlife Coordination Act.
- b. U.S. Fish and Wildlife Service coordinates the anadromous fish restoration program for the Susquehanna (with the three basin states and the Commission) and specifically expects that any operational changes among pond users (hydro or domestic water supply) will not adversely affect adult shad and herring migrations upstream, or juvenile shad and herring migrations downstream through the pond and Conowingo dam. With relicensing on the horizon for both Conowingo and Holtwood dams (2014), and U.S. Fish and Wildlife Service is currently examining a petition to list the American eel as threatened or endangered under the Endangered Species Act, eel passage issues (both directions) will be important for both projects.
- c. U.S. Fish and Wildlife Service staff leading the effort on anadromous fish restoration in the basin believes that the specific issue of whether or not leakage is included in Conowingo’s minimum flow requirement can be accommodated for migratory fish by maintaining current FERC flows for April-June and providing a permanent waiver (e.g., including leakage) for all other months.

14. **York County Planning Commission** – In comprehensively planning for York County’s future, the York County Planning Commission must consider all social, economic, historical, and environmental aspects of the Conowingo pond. The Commission is to be commended for being proactive in developing a management plan for this valuable resource.

Obviously, the York County Planning Commission is concerned with the pond being maintained as a viable water supply source for residents and a reliable source of power generation to the PJM Grid of which York County is a part. York Water Company’s water supply intake is to be used as an emergency source of water to York Water Company customers in times of drought. This will mean, York Water Company will be withdrawing from the Susquehanna River upstream of the pond at a time when the pond will be under maximum stress. Peach Bottom Atomic Power Station was near to a shutdown in 2002 due to the lowered pond level. Hopefully, the goal of a quicker/easier Conowingo leakage credit will prevent an unstable PJM Power Grid from a Peach Bottom Atomic Power Station shutdown due to a low pond level with York Water Company’s new emergency withdrawal on line in the future. Looking into the future with York County’s development pressures, it is possible that York Water Company’s pond river withdrawal may become a normal source of water supply instead of an emergency supply.

The Conowingo pond provides habitat for threatened and endangered species of flora and fauna that are contained in several natural areas, as mapped in the Natural Areas Inventory component of the County Comprehensive Plan. Protection of these habitats is important. The pond’s watershed is vital in the County’s Open Space/Greenway’s Plan, as well as other regional efforts throughout the state. The recreational opportunities for County stakeholders, as well as the historic, educational, and environmental potential of the pond and its watershed, must be preserved and enhanced (aquatic biota, reestablishment of the shad, petroglyphs, etc.).

Most importantly, the planning efforts of the Commission, Pennsylvania, Maryland, surrounding counties and municipalities, and utilities must be collaborative and coordinated efforts as established by the Conowingo Pond Management Plan.

Susquehanna River Basin Commission

a water management agency serving the Susquehanna River Watershed



November 1, 2005

Mr. Don Baldwin
Susquehanna Electric Company
Conowingo Hydro Station
2569 Shures Landing Road
Darlington, MD 21034-1503

Re: Conowingo Pool Management Plan

Dear Mr. Baldwin:

This is being sent to all Conowingo Pool Workgroup members to confirm that at its October 11, 2005, meeting, the Workgroup voted unanimously (with one abstention) to select the "Automatic Q-FERC + 1000" operational alternative for purposes of finalizing a Conowingo Pool Management Plan to recommend to the Susquehanna River Basin Commission (Commission).

The selected alternative calls for automatic initiation of a leakage credit (800 cubic feet per second [cfs]) at Conowingo Dam when flow at the Marietta gage falls below an amount equal to 1,000 cfs greater than the applicable Q-FERC trigger flow level, except during the anadromous fish spawning season (April–June).

Though the meeting on October 11 was very well attended, there were a number of Workgroup members not in attendance. If this includes you, please know that we are very interested in determining your organization's support, objection, or acquiescence to the selected alternative. Please communicate your support or objection to me or Drew Dehoff by November 30, 2005. If we do not hear from you by then, we will assume acquiescence. For your reference, materials distributed at the meeting and not provided in advance are enclosed with this letter.

It was acknowledged at the meeting that many of the Workgroup members, though personally supportive of the selected alternative, were not speaking officially on behalf of their respective organizations and wanted to undertake their internal reviews before a formal recommendation is made by the Workgroup to the Commission. If this includes you, please attempt to complete your organizational review and communicate any support or objection in writing to me or Drew Dehoff by November 30, as I had requested at the meeting. If we do not receive a written response by November 30, we will assume acquiescence.

November 1, 2005

Let me also reemphasize the point I made to members in attendance at the October 11 meeting, and inform the members who were not, that Drew and I are prepared to meet with you or other representatives of your respective organizations to present additional information or respond to questions concerning the operational alternatives evaluated by the Workgroup, the selected alternative, or the process moving forward. If you want to meet with us, please be in contact with Drew or me.

In terms of the process moving forward, barring significant objection to the selected alternative, we will prepare a draft Workgroup report, which will include a proposed management plan, to circulate to all Workgroup members for review in advance of our next meeting. The report is intended to inform the Commission of the process undertaken by the Workgroup, and to serve as the transmittal document for the proposed management plan the Workgroup would urge the Commission to adopt.

Based on the response to proposed meeting dates circulated recently, the next meeting of the Workgroup will be held on January 26, 2006. We will provide additional information concerning the meeting schedule, agenda, and location at a later date.

Our goal is to have the Workgroup finalize the report and proposed management plan at the January meeting, or at the latest by mid-February, so that it can be presented to the Commission at its March 15, 2006, meeting in Williamsport, Pennsylvania. We anticipate that the Workgroup would recommend to the Commission that it initiate a public review process prior to taking final action on the proposed management plan. The Commission's next scheduled meeting on June 14, 2005, in New York State (location to be determined) would represent the first opportunity to take such final action.

Both the public review process and the subsequent meeting of the Commission at which final action would be taken afford any of the entities represented by Workgroup members another opportunity to provide the Commission with the official position of your entity about the merits of the plan.

On behalf of Workgroup chairman, Mat Pajerowski, Maryland Department of the Environment, Drew Dehoff and myself, thank you for your participation and contribution to date. We look forward to working with you as we bring this process to what I hope we all believe will be a successful closure.

Sincerely,



Thomas W. Beaudry
Deputy Director

cc: H.A. Ryan, Exelon Generation
J. Rooney, Susquehanna Electric Company



MARYLAND
DEPARTMENT OF
NATURAL RESOURCES

Robert L. Ehrlich, Jr., Governor

Michael S. Steele, Lt. Governor

C. Ronald Franks, Secretary

November 14, 2005

Thomas W. Beauduy
Deputy Director
Susquehanna River Basin Commission
1721 North Front St.
Harrisburg, PA 17102-2391

Re: Conowingo Pool Management Plan

Dear Mr. Beauduy:

This is in response to your letter of November 1, 2005 requesting our comments on the Conowingo Pool Workgroup selection of the "Automatic Q-FERC + 1000" operational alternative. This alternative calls for automatic initiation of a leakage credit of 800 cfs at Conowingo Dam when the flow at the Marietta gage falls below an amount equal to 1,000 cfs greater than the applicable FERC license minimum flow level, except during the anadromous fish spawning season (April-June). The Maryland Department of Natural Resources (MDNR) has participated in this workgroup for the past several years and has provided the technical expertise of its consultant, Versar, Inc., in evaluating the Water Use Plan model and various alternative operating scenarios for use during low flow periods. MDNR also participates as a member of the Fish Passage Technical Advisory Committee and works on a variety of Susquehanna River power plant issues, so we are very familiar with the various fisheries and power plant issues in and around the lower Susquehanna River.

It is our belief that it is in Maryland's best interest to endorse the operational plan alternative selected by the workgroup. During the course of the last several years, we have evaluated minimum flow and leakage issues at Conowingo, including 4 emergency waivers in that period with which we concurred. This alternative provides for the wisest use of limited water supply under low flow conditions, both for operational needs within Conowingo Pool and for downstream natural resources. The waiver process is also cumbersome and will be unnecessary once the above mentioned operational alternative is implemented. The Maryland Department of Natural Resources supports the selection of this operational alternative. I look forward to continuing to work with the SRBC in finalizing a Conowingo Pool Management Plan.

Sincerely,

Richard L. McLean
Energy Resource Administrator
Power Plant Research Program

Cc: Mat Pajeroski, MDE
Pete Dunbar, PPRP

Tawes State Office Building • 580 Taylor Avenue • Annapolis, Maryland 21401

410.260.8DNR or toll free in Maryland 877.620.8DNR • www.dnr.maryland.gov • TTY users call via Maryland Relay



Pennsylvania Fish & Boat Commission



EXECUTIVE DIRECTOR
P.O. Box 67000
HARRISBURG, PA 17106-7000
717-705-7801 – 717-705-7802 (FAX)
E-MAIL: DAUSTEN@STATE.PA.US

November 23, 2005

Thomas W. Beauduy
Deputy Director
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102-2391

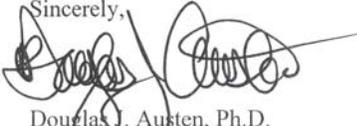
Dear Mr. Beauduy:

Thank you for including the Pennsylvania Fish and Boat Commission in the important tasks of the Conowingo Pool Workgroup.

My staff have provided me with a thorough review of the minimum flow issues at Conowingo Dam within the context of other water uses at critical flow levels and critical times of the year.

The Pennsylvania Fish and Boat Commission supports, in principle, the “Automatic Q-FERC + 1000” alternative for managing the water resources of the Conowingo Pool.

While the Q FERC + 1000 seems the optimum alternative at this juncture, all of the ramifications to the fishery resources are not clear. The Pennsylvania Fish and Boat Commission would appreciate continued participation in this important process and would expect to seek additional considerations for fishery resources, including evaluation of anadromous fish passage efficiency at Conowingo, evaluation of causes of downstream fish kills during the spring, as well as continued West Lift operations and other fishery matters that may emerge.

Sincerely,

Douglas J. Austen, Ph.D.
Executive Director

Our Mission:

www.fish.state.pa.us

To provide fishing and boating opportunities through the protection and management of aquatic resources.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Susquehanna River Coordinator
1601 Elmerton Avenue
P. O. Box 67000
Harrisburg, PA 17106-7000

November 21, 2005



Tom Beauduy, Deputy Director
Susquehanna River Basin Commission
1721 N. Front Street
Harrisburg, PA 17102-2391

Dear Tom,

This responds to your letter of November 1, 2005 requesting agency concurrence with the preferred operational alternative to be included in the forthcoming Conowingo Pool Management Plan being developed by SRBC. As a member of the Conowingo Pool Workgroup I have reviewed the numerous alternatives and model runs related to discharge options at Conowingo Dam to best meet all water needs in the impoundment. These needs include minimum flow releases from the dam for downstream resource protection, water withdrawals for domestic consumptive use, recharge of Muddy Run Pumped Storage Project, cooling capability at Peach Bottom APS, and maintenance of recreational pond levels.

I am currently the federal fisheries coordinator for the Susquehanna River Anadromous Fish Restoration Cooperative and chair the FERC-created Susquehanna River Technical Committee (SRTC). This latter group is charged with managing all aspects of the shad program at Conowingo Dam including upstream and downstream fish passage, operational adjustments and minimum flows.

I concur with the Workgroup recommendation whereby the Conowingo Hydroelectric Project would be granted automatic leakage credit of approximately 800 cfs whenever natural river flow measured at the Marietta gage falls below an amount equal to 1,000 cfs greater than the applicable Q-FERC trigger flow level, except during the anadromous fish spawning season of April through June, and as needed to augment downstream fish passage in the fall. Automatic leakage credit, if approved by FERC, will avoid the last-minute scrambling for state and federal agency concurrence each time we enter an extreme low flow period while still providing needed protection for all pool water needs.

Sincerely,

Richard St. Pierre
Susquehanna River Coordinator

cc: Jen Kagel
Dave Sutherland





DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1715
BALTIMORE, MARYLAND 21203-1715

REPLY TO THE
ATTENTION OF

November 29, 2005

Engineering Division
Civil Works Branch

DEC - 8 2005

Mr. Thomas W. Beauduy
Deputy Director
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102-2391

Dear Mr. Beauduy:

I have received your letter of November 1, 2005 concerning the Conowingo Pool Management Plan. You requested support for a tentatively selected management alternative that will become part of the final plan to be presented to the Susquehanna River Basin Commission.

Members of my Water Control Team, along with other natural resource agencies and utilities, have been participating on the Commission's Conowingo Pool Workgroup since its formation in early 2002. The Workgroup considered the competing uses of the Conowingo Pool, identified alternatives to satisfy these uses, and assessed and evaluated the impacts of the alternatives.

The Workgroup has selected the "Automatic Q-FERC + 1000" alternative for the purpose of finalizing the Conowingo Pool Management Plan. This alternative calls for an automatic implementation of an 800 cfs leakage credit at Conowingo Dam, except during the anadromous fish spawning season (April - June). The automatic leakage credit can be applied whenever river flow at the Marietta gage falls below an amount equal to 1000 cfs greater than the applicable Q-FERC trigger flow level.

Based on the results of the analyses conducted by the Workgroup, I support the inclusion of the "Automatic Q-FERC + 1000" operational alternative in the Conowingo Pool Management Plan. This alternative provides system reliability and



flexibility for the electric utilities, without compromising natural resource protection.

Changes to operational policies at the Conowingo Pool do not directly affect Corps of Engineers projects, and I see no significant unresolved issues with respect to our present water control responsibilities. I remain very interested, however, in the long-term management of the Conowingo Pool system along the lower Susquehanna River. This interest stems from proposals by others to increase releases from our upstream federal reservoirs. The purpose would be to offset the adverse effects of rising consumptive uses in the future that occur simultaneously with low stream flows.

Thank you for the opportunity to participate on the Conowingo Pool Workgroup and to comment on the tentatively selected management alternative. I look forward to receipt of the draft Workgroup report and to final Commission action on the Conowingo Pool Management Plan.

Sincerely,

Stanislaw P. Gembicki Jr., P.E.
Chief, Engineering Division

CF: CENAB-PL-P (Mr. Dan Bierly)

Safe Harbor Water Power Corporation

ONE POWERHOUSE ROAD, CONESTOGA, PA 17516 ■ TELEPHONE 717-872-5441 FAX 717-872-0282

December 2, 2005

DEC - 8 2005

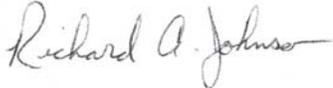
Thomas W. Beauduy
Deputy Director
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, Pennsylvania 17102-2391

Dear Mr. Beauduy:

Safe Harbor Water Power Corporation is very appreciative of the opportunity to be represented on the Susquehanna River Basin Commission's Conowingo Pool Workgroup. The Plan developed by this group does not cause concern with the commercial operation of our facility at this time.

If additional studies or changes to the plan are required in the future we would again be willing to support these activities.

Regards,



Richard A. Johnson
Manager of Engineering



Marshall J. Kaiser
President & CEO

RAJ/MJK/cgc

DAVID R. CRAIG
HARFORD COUNTY EXECUTIVE



LORRAINE COSTELLO
DIRECTOR OF ADMINISTRATION

HARFORD COUNTY GOVERNMENT

November 22, 2005



Mr. Thomas W. Beauduy
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102-2391

Re: Conowingo Pool Management Plan

Dear Mr. Beauduy:

Please accept this letter as written concurrence on Harford County Government's affirmative support of the selected operational alternative referred to as "Automatic Q-FERC + 1000". This is written in response to your November 1, 2005 letter to Ms. Jackie Ludwig, regarding the need for formal response for the vote that stakeholder members cast at the October 11, 2005 Conowingo Pool Workgroup meeting.

I understand that after beginning this workgroup in Spring of 2002 and after extensive work on modeling the River, calibrating the existing demands, estimating the future demands and reviewing many operational strategies for the Pool, the group narrowed down to four operational alternatives. The "Automatic Q FERC + 1000" option provided a better overall quantity of water available for all the needs of the Pool, including fish and wildlife, recreational and power and drinking water demand. This alternative also had better ease of implementation, flexibility and operational reliability and manageability.

The County appreciates you and your staff's work effort in the past and in the future on this very important Plan, and that also of your hired consultant, HydroLogics, and their work on modeling the Susquehanna River. Not only is this model a vital tool now, but will be well into the future.

I look forward to the final plan and the Commission support on the workgroup's recommendations.

Cordially,

A handwritten signature in cursive script, appearing to read "David R. Craig".
David R. Craig,
Harford County Executive

Preserving Harford's Past; Promoting Harford's Future

MY DIRECT PHONE NUMBER IS 410-638-3350

101 SOUTH MAIN STREET, BEL AIR, MARYLAND 21014 FAX: 410-638-1387 • TTY 410-638-3086 • www.harfordcountymd.gov



YORK COUNTY PLANNING COMMISSION

100 WEST MARKET STREET, YORK, PENNSYLVANIA 17401
TELEPHONE: (717) 771-9870 FAX: (717) 771-9511

November 14, 2005

Mr. Thomas W. Beauduy
Deputy Director
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102-2391



Re: Conowingo Pool Management Plan

Dear Mr. Beauduy,

In regard to your letter requesting York County Planning Commission's support for an operational alternative for Conowingo Pool management planning, I am writing to confirm York County Planning Commission staff support for the use of "Automatic Q-FERC + 1000" operational alternative for the purpose of finalizing a Conowingo Pool Management Plan to recommend to the Susquehanna River Basin Commission.

The York County Planning Commission was pleased to be invited to participate on the Conowingo Pool Workgroup, and as you are aware, a dedicated staff member was assigned to participate. I would like to commend the Susquehanna River Basin Commission for proactively planning for the future management of the Conowingo Pool in order to best utilize and preserve this valuable resource.

Staff of the York County Planning Commission is pleased to work cooperatively with the SRBC on this effort and future planning efforts.

Sincerely,

Felicia Dell
Director
York County Planning Commission

cc: file

TERRY L. DUNLAP, CHAIRMAN • WALTER A. KUHL, VICE CHAIRMAN • MARY E. COBLE, SECRETARY • DANIEL M. LEESE, TREASURER
STEPHEN W. BECK • WALTER A. LOBODINSKY • JEFF PROPPS • MARY KAY REED • SCOTT SIMONDS
FELICIA S. DELL, DIRECTOR • JEFFREY L. REHMEYER II, SOLICITOR

EQUAL OPPORTUNITY EMPLOYER



The York Water Company

November 8, 2005

Mr. Drew Dehoff
Susquehanna River Basin Commission
1721 North Front St.
Harrisburg, PA 17102-2391

Dear Mr. Dehoff:

We have reviewed your letter dated November 1, 2005 regarding the proposed Conowingo Pool Management Plan. The York Water Company concurs with the proposal to select the "Automatic Q-FERC + 1000" operational alternative.

If you have any questions, please call.

Sincerely,

Jeffrey R. Hines, P.E.
Vice President - Engineering

THE YORK WATER COMPANY
TEL. (717) 845-3601

130 EAST MARKET STREET, P.O. BOX 15089
FAX (717) 852-0058
www.yorkwater.com

YORK, PENNSYLVANIA 17405-7089
email: info@yorkwater.com

