



North Carolina Department of Environment and Natural Resources
Division of Water Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary
John N. Morris, Director

Monday, February 10, 2003

To: Gene Ellis, Alcoa

From: Tom Fransen, NC DWR

Subject: Draft Drought Contingency Plan

The Division of Water Resources appreciates the opportunity to comment on the January 30, 2003 Draft *Drought Contingency Plan*. The Division has the following comments.

On page, 2 Competing Demands for Water, expand the impacts to include instream uses including fisheries, aquatic habitat and recreational users for the *Environment and Wildlife* and *Recreational Users* sections, not just the lake impacts. Also, you need to include Duke Power as one of the major withdrawals from the lakes.

On the top of page 3, we would like to see “hold bi-weekly meetings” changed to “hold meetings as needed”. Depending upon the severity of the drought, meeting or conference calls may need to be more frequent if conditions are extremely bad or not as frequently if the drought is mild.

As discussed on Tuesday’s conference call, we have concerns that the number of parties to be included in the meetings or conference calls needs to be expanded. The *Competing Demands for Water* section identifies a number of stakeholders that need to be included. We all need as much information as possible to make informed management decisions. A balance can be achieved between adequate representation and still remain small enough to be functional. Including the larger group of stakeholders worked in other basins during last year’s drought. For example, in the Roanoke River Basin, there were weekly conference calls and monthly meetings. The calls and meetings typically had representation from the states of North Carolina and Virginia, the Corps, Dominion Resources, Southeast Power Administration, municipal water systems from both states, industries (ranging from a large paper mill to marina operators), homeowner associations, and basin interest groups. Decisions were achieved in a timely manner and with a lot less follow-up communications needed afterwards.

Page 3, Step 2 A – *Declaration of the existence of a Drought*. Using the US Drought Monitor should work. I would suggest slightly tighter wording than just a D1 within the Yadkin-PeeDee basin. Different parts of the basin can and typically do have differing levels of drought classification. Suggested wording would be “The Parties agree that the existence of a drought will be deemed to occur if at anytime the U.S. Drought Monitor elevates 10% or more of the Yadkin-PeeDee River basin to a Drought Severity of D1 or higher.”

On Tuesday's conference call, there was some discussion about having the *Drought Contingency Plan* have more details on how the system will be managed during drought. For example, when High Rock Reservoir reaches an X elevation, the Rockingham target will be reduced by Y cfs. That level of detail needs to be developed during relicensing. The studies needed to define that level of detail have not been completed or have not begun. A basin model has not been completed, the water quality issues associated with lake drawdowns need to be studied, more analysis is needed for the salt water intrusion issue at South Carolina public water supply intakes, and a better understanding of the industrial water quality issues along the mainstem of the PeeDee River is needed. The adaptive management approach used this past summer is the best approach until a more comprehensive *Drought Contingency Plan* can be completed as part of relicensing.

Even though the studies have not been completed for a plan with a lot of detailed operational parameters, the plan needs to include the operation goals or guiding principles that were in the *Post-September 15 Emergency Drought Management Protocol*. The section 2 B, *Implementing Operational Changes*, includes the minimizing of environmental and economic damage, but not the protection of public health and safety. The protection of public health and safety needs to be included. We do not want at this time specific reservoir drawdown limits included, but under possible courses of action, include a bullet on a goal of proportional reservoir drawdown.

Thank you for the opportunity to comment on the draft plan and we look forward to the continued cooperation among all the parties in the implementation of the plan.