

# SaveHighRockLake.org

Help Us Rescue "The Rock"

P.O. Box 628 Southmont, NC 27351

## Project 2197 Draft License Application Comments

Following the release of APCI's Draft License Application for Project 2197, SaveHighRockLake.org posted the DLA on our web site. Within 30 days it had been downloaded by hundreds of interested stakeholders. We solicited written comments from our members as well as other interested parties concerned about the future of High Rock Lake. We also solicited oral comments at multiple community functions, local club and organization meetings, as well as countless one on one interviews with recreational users of High Rock Lake.

The Board of Directors for SaveHighRockLake.org would like to offer the following comments on the DLA on behalf of our members that submitted written comments or offered oral comments. Not surprisingly, over 95 percent of those making comments were concerned primarily with the proposed Operational guidelines included for each of the impoundments. The specific concerns expressed included:

1. The specific inclusion of allowable drawdowns of High Rock Lake amounting to approximately 66% of the average depth of High Rock.
2. The specific exclusion of allowable drawdowns at Badin lake in excess of 15% of the average depth of Badin Lake
3. The proposal to operate High Rock Lake almost identically to the way it has been operated for many decades.
4. The inclusion of minimum discharges from High Rock Lake ( 1500 cfs ) at a rate of 167% of the proposed total project discharge of 900 cfs when High Rock Lake falls BELOW the proposed operating guide curve.
5. The apparent misrepresentation of available high quality aquatic habitat at High Rock under the proposed operating guide. If only 21% of the habitat in the top 12 feet of High Rock was considered high quality, it is inconceivable that 19% of that habitat would be available at a 10 ft. drawdown.
6. The apparent disregard of recreational safety concerns associated with excessive water level fluctuations.
7. The apparent disregard of the conclusions of the scientific studies concerning Fish and Aquatics, Wetlands, Water Quality, Recreational opportunities and safety, Economic impacts and Visual Quality that are supposed to be the basis for licensing decisions.
8. The **unequal** considerations given to power generation verses recreation, fish and wildlife and environmental concerns as prescribed in the Electric Consumers Protection Act of 1986.
9. The lack of any specific Low Inflow Protocol terms and conditions.

While this is only an abbreviated list of the total comments submitted, it is very obvious that our members are still very concerned about the future of High Rock Lake and the lack of any specific terms and conditions designed to prevent a recurrence of the events of 2002. We must agree with everyone who took the time to read the 318 page document and went to the trouble to make sure their concerns with the DLA were voiced. We feel as an organization that the present proposal for operations of Project 2197 is totally unacceptable and must be modified significantly in order to begin to honor the terms specified in the Electric Consumers Protection Act of 1986.

While High Rock Lake may be a large impoundment, the proposal **MUST** include consideration for the fact that it is a very shallow impoundment and is incapable of providing the flows specified in the DLA continuously. History has already demonstrated that the operating guidelines included in the DLA will result in extreme environmental devastation of aquatic habitat, continued water quality problems, increased sedimentation and present continuing problems to safe recreation.

The 8000+ members of SaveHighRockLake.org feel that the operational proposals presented by the High Rock Lake Coalition would address these concerns. According to the results of the studies completed, High Rock Lake provides more recreation days and recreational opportunities for the public than all three of the other impoundments in the project. It is also already listed as “Impaired” by the State of North Carolina. These two facts alone demonstrate that some special considerations **MUST** be given to High Rock in order to protect the environment and wildlife there as well as insuring the safety of the public. Almost every study correctly concluded that higher more stable water levels at High Rock would be beneficial to water quality, fish habitat, wetlands and aquatic vegetation, sedimentation, visual quality and recreational safety. We feel that any proposal must:

1. Include reasonable allowable fluctuations at each impoundment based solely on the physical and environmental characteristics of that impoundment.
2. Not specify discharges from any single impoundment in excess of the proposed total project discharges.
3. Fairly represent the results of the scientific studies to protect wetlands, aquatic habitat, water quality, area economic impact and recreational usage and safety.
4. Include specific Low Inflow Protocol terms and conditions designed to protect the environment at each impoundment, share the burden of low inflows equitably and provide realistic minimum/maximum discharges from the project.

Respectfully submitted,

*Robert W. Petree*

Chairman of the Board  
SaveHighRockLake.org