

REGIONAL PARTNERSHIP OF LOCAL GOVERNMENTS

*Representing Lake Gaston, Roanoke Rapids
Lake and Kerr Lake*

Brunswick County, Virginia
Franklin County, North Carolina
Halifax County, Virginia
Mecklenburg County, Virginia
Northampton County, North Carolina
Oxford, North Carolina
Vance County, North Carolina
Warren County, North Carolina

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December 11, 2001

Sharon F. Haggett, P.E.
Project Management Branch
U.S. Army Corps of Engineers, Wilmington District
Post Office Box 1890
Wilmington, North Carolina 28402-1890

RE: Kerr Reservoir 216 Study

Dear Ms. Haggett:

On behalf of the Regional Partnership of Local Governments, I write in response to the 216 Study sponsors' invitation to provide written comments no later than December 15, 2001.

The members of the RPLG are counties and cities within the Roanoke River Basin in both Virginia and North Carolina. The citizens of RPLG's member jurisdictions are those people who live in the vicinity of Roanoke Rapids Lake, Lake Gaston and Kerr Lake. They have ordered their lives around the existing operation of these facilities. Many of them depend upon the lakes for jobs, recreation, water supply and flood control, and many have made substantial investments in property and businesses in reliance on current operational practices. Like these citizens, the governments which represent them have ordered their existence around continued benefits from the lakes. As a result, preservation of the benefit of the lakes is just as important to the local governments in the Roanoke River Basin as it is to the citizens who reside therein.

The RPLG believes that any proposed departure from existing practices should be carefully weighed to insure that the anticipated benefit of each such change outweighs any possible consequences which might result therefrom. While the RPLG is not opposed to change and has not adopted a "do-nothing" posture, the RPLG urges prudence

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as a general proposition, and in particular suggests that any change be supported by reliable science or other proven data.

The RPLG's general areas of concern are as follows:

Preservation of economic benefits: The RPLG's jurisdictions represent some of the lowest per capita localities in Virginia and North Carolina. It would be difficult to overstate the importance of Kerr Lake (and Lake Gaston and Roanoke Rapids Lake) to the RPLG's area. A primary economic benefit is tourism, which is a direct result of the lakes. Another direct benefit is the value of property adjoining the lakes. Another direct benefit is the availability of water for growth. An indirect benefit is the value of the lakes as an amenity available in our area. When pursuing economic growth rural areas often encounter resistance to relocation of company executives. The availability of lake property and lake recreation often outweigh what those who would be relocated to our area might perceive as other disadvantages of a rural location. To repeat, the lakes are of enormous economic importance to an economically distressed area.

Lake levels: This issue is closely related to the economic benefits of the lakes, but deserves separate attention. If the level of Kerr Lake could be stabilized, such stabilization would benefit tourism, property values and the reliability of the lake as a water source (including water for domestic consumption). The RPLG would therefore support a study of ways to stabilize the level of Kerr Lake, coupled with a study of whether adverse consequences would result, and if so what those consequences would be.

Adaptive management: At the November 15 meeting the phrase "adaptive management" was mentioned numerous times. If there is thought of "adaptively managing" the Kerr facility pursuant to recommendations from the 216 Study, the RPLG asks that the parameters of adaptive management, the identity of those who will participate in the decision making process, and the means by which "adaptive decisions" will be made should be clearly and unequivocally defined. The RPLG does not see how it, or any other participant, can support or oppose adaptive management until that information is known.

Interbasin transfers: The RPLG opposes withdrawals from Kerr Lake, or elsewhere in the Roanoke River Basin, for transfer out of the Basin. It is the RPLG's position that if any interbasin transfers are approved (notwithstanding the opposition of the RPLG), the withdrawal permit should include a requirement that at least ninety percent (90%) of the water withdrawn must be returned directly into the reservoir from which it was withdrawn, or into a portion of the watershed which feeds back into that same reservoir.

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Sincerely,


Russell O. Slayton, Jr.

ROSJR/hrf
cc: RPLG Representatives meck01/shaggett.let