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From: Tom Brawner [mailto:tbrawner@mindspring.com]

Sent: Saturday, December 15, 2001 1:52 PM

To: Sharon F. Haggett; John Morris; David Paylor

Subject: Section 216 Issues and Outcomes: RRBA

To: Sharon Haggett; John Morris; and David Paylor

Following up on a request made by the Corps of Engineers at a meeting of the Section 216 Study Advisory Committee on Thursday, November 15 in Raleigh, I am submitting the issues that we would like to be addressed and the outcomes we would like to see achieved in the Section 216 Study (the "Study").

In our letter of April 25, 2000 to the Corps' Sharon Haggett, we outlined a number of issues of concern. We do not wish to limit that earlier letter, but instead wish to highlight in this letter the issues and outcomes that have the highest priority to us under present circumstances.

Quantify the Various Benefits for Kerr Reservoir; Reassess the Priorities at Kerr Reservoir. Much as the Corps has assessed flood damages prevented by Kerr Lake, the Study should quantify, to the extent practicable, the other primary benefits of Kerr Lake: hydropower, recreation, water supply, low-flow augmentation as well as fish and wildlife. What economic benefits are associated with each purpose of Kerr Reservoir? During what time of the year do these purposes provide the most economic benefits? During what hydrological conditions and seasons are these various purposes most susceptible to harm? Are there negative impacts of current flood control operations (e.g., water quality problems associated with prolonged growing season flooding downstream, as discussed later) that should be factored into any assessment of flood damages prevented?

The Study should assess the geographical scope of the intended benefits, with greatest weight given to in-basin benefits. The Corps has indicated in the Reconnaissance Report that Kerr Reservoir is a "regional resource." The Study should identify the "region" that should be benefited by Kerr Reservoir? RRBA believes that the region to be benefited by the operation of Kerr is the Roanoke River Basin and that the benefits should be evaluated on that basis.

Adjustment of Operations Policies to Accommodate Warmer, Drier Conditions. With credible studies forecasting both drier and warmer conditions over the next 100 years, Kerr should be operated to anticipate these conditions. The Study should consider what impact these drier and warmer conditions will have on water resources in the basin, including the impact of increased evaporation. The Study should consider possible adjustment of the guide curve at both Kerr Lake and Philpott Lake as necessary to reserve more water for summer and fall releases downstream.

Adjustment of Operations Policies to Accommodate Lake and Downstream Interests. The Study should address (1) the impact of prolonged growing season flooding in downstream riparian ecosystems on the water quality in those ecosystems. (The Nature Conservancy is doing extensive work in this area); and (2) the impact of fluctuating lake levels at Kerr Lake on recreational and development interests there (including impacts on shoreline erosion and aquatic habitat) as well as on economic and environmental interests downstream. These impacts should also be compared to forecasted impacts under differing operations scenarios.

Establish a Drought Management Policy. Recent experience suggests an increasing frequency and severity of droughts in the Roanoke River Basin. Recent experience also suggests a haphazard response to drought conditions (e.g., the City of Henderson is currently refusing to respond to the December 10 call for water conservation). The drought management policy should rely on the Roanoke River Basin Reservoir Operations Model (or comparable model) to determine what combination of water inflow and reservoir water level data best serves as the trigger for implementation of drought response measures. The triggers should be absolute (e.g., lake level and/or inflows) rather than relative (e.g., “20-year drought”). The triggers should occur earlier than they occur under the current Water Control Plan for Kerr Reservoir. Implementation of drought response actions should occur in stages, beginning with simple notification, then moving to voluntary and, later, mandatory conservation measures. The Study should examine other drought management policies, including the recently adopted drought policy in the Washington, DC area (Metropolitan Washington Water Supply and Drought Awareness Response Plan: Potomac River System, June 2000) to determine the most appropriate plan. See also, our comments below concerning interbasin transfer.

Establish an Interbasin Transfer Policy. Given the increasing threats of interbasin demand coupled with the lack of harmony in Virginia’s and North Carolina’s interbasin transfer policies, the Study should develop a uniform policy that makes clear when, if ever, Kerr Lake can serve as a water source for water users outside of the Roanoke River Basin. For a host of reasons – planning purposes, sound development policy, the basin’s economic future, the higher percentage consumptive use by out-of-basin users, the higher variability of water use by out-of-basin users in drought vs. non-drought conditions, the greater interest by those who live and work in the basin in preserving the quality of its natural resources, etc. -- RRBA believes that the Study should establish a clear priority in favor of in-basin water users over out-of-basin water users. At the very least, the policy should require all those who use the basin’s water, including out-of-basin users, to (a) return the maximum, practicable amount of treated wastewater to the basin in a manner that does not impair water quality; (b) maximize off-stream storage of water, and (3) reduce water withdrawals during defined drought conditions.

Manage Kerr Reservoir with a System-Wide Focus. RRBA endorses the broadest possible scope for the Study, including bringing Philpott Reservoir within the scope of the Study and encouraging the fullest participation in the Study by both upstream and downstream stakeholders. Among other things, RRBA believes the Study should address how the Corps might become part of variance protocol at upstream Smith Mountain Lake/Leesville, so that the Corps will be consulted before such upstream variances are granted. The Corps should become an active participant in proceedings having potential basinwide impact, including the current Gaston/Roanoke Rapids relicensing, the upcoming Smith Mountain Lake/Leesville relicensing and the proposed Roanoke River Basin Commission. Finally, the Study should consider implementation of adaptive management principles on a system-wide basis, whereby a mix of governmental and private stakeholders participate in a process of incremental changes in management operations -- with monitoring of results and further adjustments where appropriate -- in order to achieve an optimal balance among competing interests in the basin.

Thank you for the opportunity to comment.

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