

Yadkin Hydro Electric Project FERC Project # 2197-073
Comments from the High Rock Lake Association Inc.
about the
Draft Environmental Impact Statement

- Hello, I'm Larry Jones, President of the High Rock Lake Association Inc. Our association was formed in 1954 to "Foster and Promote the Welfare of High Rock Lake and the Yadkin River". For over half a century we have worked to obtain more stable water levels in the lake, to improve water quality, and to insure the lake is operated in a way to provide the best possible recreational opportunities to the citizens of this region.
- Through the Associations involvement with the Relicensing process, we believe we have found a way to make tremendous strides forward toward our goals. The Relicensing Settlement Agreement, which is a part of Alcoa's license application, provides a roadmap for enhancement of lake management practices that we believe will benefit all segments of the region; including environmental, economic, and recreational interests.
- We are pleased the Draft Environmental Impact Statement prepared by FERC adopts the principals and guidelines that stakeholders incorporated into the Relicensing Settlement Agreement. As one of those stakeholders who spent countless hours over the past 4 years developing the RELICENSING SETTLEMENT AGREEMENT, it is gratifying to find FERC's staff has validated our work.
- I must tell you tonight there is one portion of the Draft Environmental Impact Statement that causes us concern; and that is the idea that Alcoa alone should be held accountable for the effects of sedimentation in High Rock Lake and High Rock's headwaters. The HIGH ROCK LAKE ASSOCIATION INC. is concerned the financial burden on Alcoa imposed by FERC's adoption of Salisbury's request could jeopardize the Relicensing process as it is now proceeding. We are concerned that potential expense of sedimentation and flood mitigation proposed by Salisbury will lead to extended litigation and/or hearings and cause indefinite delays in issuance of a new license. If that happens, it is our understanding Alcoa can continue to operate the Project under terms of the existing license.
- Such a delay would be a disaster for the region. As an example, consider this year's DROUGHT. Alcoa has voluntarily cooperated with stakeholders and operated the project in what I call a "SIMULATION MODE"; using the proposed Low Inflow Protocol guidelines. As a result, High Rock Lake reached a low level of about 7½ ft. Below full this fall, and is presently just over 2 ft. Below full. Compare this to 2002, when we were down 24 ft. In a similar drought! Also compare this to other lakes in the region, now at historic low levels.
- If the license is delayed, we will lose all the gains that so many stakeholders invested thousands of hours developing, and Alcoa will enjoy increased profits while operating under old license terms.
- The sedimentation issue is real, but it is a burden that must be shared by the entire watershed community, not just one company. Sedimentation controls, trash and litter policies, and storm water retention policies are just a few of the areas that must be aggressively addressed by cities and governmental units to improve the problems facing our rivers and lakes.
- Examples here in Salisbury include some huge new development grading projects where raw dirt has remained unseeded for a couple of years, causing severe sediment transport to High Rock. Salisbury still uses "Street Washing Equipment" flushing its trash and debris directly into our lake. The construction of I-85 is another major problem for the Lake.
- As for the flooding issues, FERC has performed its own studies during the past 12 years that have concluded the operation of High Rock Lake does not affect conditions upstream of the I-85 Bridge; yet the Draft EIS seems to ignore those studies. In preparation of the EIS, did FERC re-visit those studies? Has FERC considered the most recent Flood Plain maps produced by State and Federal agencies? Improvements within flood plains are always at risk, and the owners of those facilities must accept those risks.
- Even more to the point, the YADKIN PROJECT DOES NOT THREATEN THE AREA'S WATER SUPPLY; IT ACTUALLY PROTECTS IT BY CREATING USABLE STORAGE. What may be threatened is a century old water intake system that has served its design life. The burden of any needed updates to this aging infrastructure is a civic matter. The HIGH ROCK LAKE ASSOCIATION INC believes Salisbury's infrastructure needs are not a reason to delay issuance of a new license.

- The HIGH ROCK LAKE ASSOCIATION INC asks that FERC not adopt Environmental Measure #19.
- Thank You.