

April 4, 2003

Mr. R. Lewis Shaw, Deputy Commissioner
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201-1708

Re: **South Carolina DHEC March 28, 2003 Letter to FERC
Yadkin Hydroelectric Project
FERC Project Number 2197-060**

Dear Mr. Lewis,

In a Motion to Intervene and the accompanying above referenced letter, your agency took specific aim at a letter The High Rock Lake Association Inc. (HRLA) filed with FERC dated February 27, 2003. SC DEHC characterized our comments as "*troubling*" and charged we wanted the level of High Rock Lake maintained for "*aesthetic and recreational reasons*".

Our letter requested operation of High Rock Lake to be changed to Run-of-River mode while maintaining relatively constant lake level. We observed that such a plan would provide benefits including:

1. Interests downstream of High Rock Lake would always enjoy water flow in natural quantities and according to historical seasonal flow rates.
2. Elimination of the present practice of using High Rock Lake to entirely capture and very slowly release storm surges would prevent artificial manipulation of downstream river levels.
3. The lower Pee Dee basin could benefit from storm surges. Such surges could prove very beneficial in "flushing" the coastal estuarine system, and help retard possible salt water intrusion.
4. Relatively constant water level in High Rock Lake would have a huge positive impact on ground water levels, water quality, environmental issues, fish and wildlife, recreation, and tax values.
5. Drought recognition and related action requirements would be minimized.
6. Drinking Water supplies in the Yadkin River Basin would be protected.
7. Constant water level will mitigate bank erosion, and help minimize an already serious sedimentation problem.
8. Constant water levels will protect adjacent wetlands, and the corresponding value of those wetlands.

Apparently many of the above were considered "Aesthetic" by your office; but we believe that is a shallow interpretation of perceived benefits that could be obtained by Run-of-River mode of operation. To help us better understand your views, please respond to this letter by telling us which of our benefits listed above are objectionable to you, and the basis of your concern.

We would also appreciate your assistance in providing accurate data that will help us more clearly understand your worries about threatening the public drinking water supplies. Please provide a map of the region that clearly shows all public water intake locations for drinking water in the Pee Dee Basin and for (to paraphrase your letter) "the entire northern coast of SC". Ideally these maps can be complete with daily/annual usage at each location. Information that has previously been available to us has been vague, and perhaps has caused us to not be properly informed on this issue.

We look forward to your response.

Cordially,

Larry O. Jones
President
High Rock Lake Association Inc.

cc: Hon. Magalie Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426