

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

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July 8, 2002
1828 Brandon Ave. SW
Roanoke, VA 24015

Joseph P. Hassell
Virginia Dept. of Environmental Quality
P.O. Box 10009
Richmond, VA 23240

Dear Mr. Hassell:

Comments regarding proposed Special Consent Order to Old Dominion Electric Cooperative and Virginia Power regarding the Clover Power Plant, Halifax County, Virginia – Virginia Water Protection Permit No. 89-1282

I am writing on behalf of the Board of Directors of the Blue Ridge Environmental Defense League. BREDL is a regional, community-based, non-profit environmental organization. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters throughout the Southeast.

During the drought years, local precipitation events have obviously been few and far between. We are concerned that pumping water during these few local precipitation events for storage may prevent drought impacted areas downstream from receiving benefits from such events.

The U.S. Army Corps of Engineers' John H. Kerr Project Drought Update from June 25, 2002 stated that "since June 1998 only 10 out of the past 49 months had above average rainfall and only 3 of the 49 months had monthly inflows equal to or greater than average. The past 22 months have had inflows below normal, with average inflows trending about 43 percent of normal." The update further stated that, "since June 1998, the total watershed rainfall deficit is approximately 36.7 inches, or an average of 0.74 inches per month."

The Corps further states that, "The drought and the resulting low lake levels continue to be a major concern at Kerr Dam." One area of concern is access to boat ramps. As of the June 25, 2002 report, the Kerr Reservoir was near 299.58 feet. The Corps states that "boat-ramp access to the reservoir becomes increasingly limited below pool elevation 293 feet."

We formally request Old Dominion Electric Cooperative and Virginia Power (ODEC/VP) and the Virginia Dept. of Environmental Quality to examine and address the following concerns:

- impacts (especially low water levels and temperature changes) to aquatic species, especially endangered, threatened and special concern species. Strict limitations should be in place during the spawning season.
- impacts to recreational activities, which may already be affected by drought conditions. This should include, but not limited to, impacts to River Bank Trail, Staunton River State Park, Occoneechee State Park, and recreational opportunities on the Kerr Reservoir.
- impacts to individual landowners and other watershed stakeholders
- impacts that may be added from any proposed projects, these may be separate from ODEC/VP, within the watershed
- impacts downstream. The John H. Kerr reservoir levels would not be replenished with the captured/stored water. This would impact those dependent on the reservoir as well as those downstream, if the dam is not able to release enough water.

We further request to be kept abreast of any findings.

Thank you for this opportunity to comment.

Sincerely,

Mark E. Barker
SW Virginia VP
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