



LAKE HARTWELL ASSOCIATION, INC.

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July 13, 2011

Colonel Jeffrey M. Hall
US Army Corps of Engineers
P. O. Box 889
Savannah, GA 31402-0889

Re: SRB Drought Contingency Plan Refinement, Request for Comments dated June 16, 2011.

Dear Colonel Hall:

The Lake Hartwell Association cannot endorse the recommended changes as defined in the *Draft Savannah River Basin Level 4 Drought Operations Study Environmental Assessment (EA)* nor do we agree with the *Draft Finding of No Significant Impact (FONSI)*, as stated in the document. If water levels drop anywhere close to Drought Level 4 there is a very high probability of a significant impact to the people using water from Hartwell Lake. **One of the most significant impacts could be an impaired quality of water creating a potentially dangerous health situation for many thousands of users.** This possibility requires a detailed technical analysis of Hartwell Lake water issues at Drought Level 4. Many steps can be taken at earlier drought levels to greatly reduce or eliminate this possibility.

LHA understands the reasoning for having Environmental Assessments (EAs) in place before specific drought levels are reached. It is an expedient way to operate. **Unfortunately, by the time Drought Level 4 is reached, as defined by your proposal, Hartwell Lake will be 35 feet below full pool. The last major drought, one from which we have only recently recovered and which caused serious economic damage by devastating recreation and real estate activities around our nearly 1000 miles of shoreline, was the lowest ever experienced at 22 feet below full pool. It is difficult to imagine the damage that Level 4 would cause.** In addition to potentially impaired water quality, many of the businesses such as marinas, dock builders and the like, some of which have been serving the lake's recreational users for decades, would be forced out of business. A number of these businesses were forced to close as a result of the last drought. **Recreation is, after all, a Corps mandate.**

We have been assured numerous times that the Corps would become more adaptive in managing droughts based on lessons learned from previous drought experiences, and would make every effort to keep the lakes as full as possible. Water in the lakes is an asset, and like money in the bank, is available for use if needed for downstream emergencies. Once released, however, the water is gone and is no longer available.....period. **We are asking that the Corps begin thinking adaptively now as we are already experiencing drought conditions in both states, and the above average heat in the Southeast has increased the demand for electrical energy. If flows of 3100 cfs satisfy downstream needs at Drought Level 4 during the cooler months of November through February, then they should be adequate beginning at Drought Level 1. In addition, should Drought Level 3 occur, out-flows should not exceed in-flows, in order to prevent a Level 4 situation.**

On behalf of the more than 2000 family, organizational, and business members of the Lake Hartwell Association, we request a full Environmental Impact Statement (EIS) to assure the results you have indicated are absolutely correct; and to possibly suggest other alternative measures that, together with lessons learned from previous droughts, would aid in avoiding potentially hazardous lake levels.

We also urge you to consider improved processes to reduce flows at Drought Levels 1, 2 and 3 and strongly recommend, that should Drought Level 3 be reached, out-flows should not exceed in-flows, in order to avoid a Level 4 situation. We encourage the Corps to act now to have EAs permanently in hand to ensure that these measures can be implemented in a timely and aggressive manner until such time as a more acceptable and conservative permanent Drought Management Plan is approved and implemented.

Thank you in advance for considering our recommendations for conserving and protecting our magnificent Savannah River Basin lakes.

Sincerely,

A handwritten signature in black ink, appearing to read 'HB', with a long horizontal flourish extending to the right.

Herb Burnham, President
Lake Hartwell Association