



May 18, 2016

Jordan Lake Comments
Division of Water Resources
1611 Mail Service Center
Raleigh, NC 27699- 1611

On behalf of the citizens of the Town of Knightdale and the regional utility that is the City of Raleigh Public Utilities Department; we respectfully submit the following comments in regards to the Jordan Lake Water Supply Allocation process, Round 4.

Identifying and acquiring future drinking water resources is of paramount importance to the orderly growth and economic vitality of any community. In our case, the City of Raleigh Public Utilities Department unites the City and the Towns of Garner, Knightdale, Rolesville, Wake Forest, Wendell and Zebulon with the shared goal of meeting our combined water and wastewater needs now and into the foreseeable future.

The area made up by our communities and our utility has been identified by the North Carolina Department of Environmental Quality as the most “needful” of any in North Carolina, in terms of future water supplies.

To facilitate broader regional water resource sharing and planning, the City joined the Jordan Lake Partnership. The Jordan Lake Partnership was formed in 2009 to collaboratively develop a sustainable and secure water supply for the Triangle Region. Its membership includes Apex, Cary, Chatham County, Durham, Hillsborough, Holly Springs, Morrisville, Orange County, Orange Water and Sewer Authority, Pittsboro, Raleigh (on behalf of the City and its utility merger partners), Sanford and Wake County.

The Jordan Lake Partnership is committed to proactive, comprehensive water resource management and planning to meet the future needs of our region. Over the past five years, the Jordan Lake Partnership has worked to develop the Triangle Regional Water Supply Plan which maps out how the Triangle Region’s water supplies can sustainably serve our communities through the year 2060 – without compromising any downstream community’s ability to meet its own water needs.

Planning for new water resources can encompass decades. Regional planners within the City of Raleigh Public Utilities Department have identified four new water resource options as technically feasible and have included these options in the Triangle Regional Water Supply Plan. These options are:

- i. A new reservoir on the Little River in eastern Wake County;
- ii. Reallocation of storage in Falls Lake;
- iii. Withdrawal of water from the Neuse River just above the Neuse River Resource Recovery Facility (formally known as the Neuse River Wastewater Treatment Plant); and
- iv. Withdrawal of water from the Neuse River just below Falls Lake with the use of an existing quarry for storage.

Each of the alternatives involves very challenging environmental, social and economic questions and the level of effort required to evaluate each alternative will be significant.

Because of the difficulty and uncertainty associated with any alternative, the City submitted an application for 4.7% of water supply storage allocation in Jordan Lake for Raleigh and its utility merger partners. Raleigh and the Town of Knightdale consider this a temporary allocation, with an end date of 2045 or earlier to be specified in Raleigh's allocation contract. This allocation is intended to bridge unforeseen time delays between alternatives. With a contractual end date of or before 2045, Raleigh's requested allocation is consistent with the Jordan Lake Partnership's preferred alternative and Triangle Regional Water Supply Plan. It also allows for all parties to meet their water supply needs through 2060 without compromising the ability of any downstream water suppliers to meet their own needs.

The Town of Knightdale supports the City of Raleigh's Jordan Lake allocation request and the requests of our peers in the Jordan Lake Partnership; the Town of Knightdale urges the North Carolina Environmental Management Commission (EMC) to grant these requests, including a time bound interim allocation to the most needful water system in the State.

The Town of Knightdale also supports the North Carolina Division of Water Resources' Draft Cape Fear River Water Supply Evaluation, as presented in December 2015. The Draft Evaluation demonstrates that all water suppliers downstream of Jordan Lake can meet their respective drinking water supply needs through 2060.

In summary, the water supply allocation request from the City of Raleigh is the result of a careful resource planning process and represents the most practical way to address all of our future drinking water needs. It should also be noted the Jordan Lake Partnership members have established a strong environmental stewardship record through water conservation efforts, mutual aid interconnections and proper investments in our water infrastructure. The City of Raleigh and its utility merger partners is a nationally recognized model of prudent regional utility management. Together our communities have demonstrated both need and reasonable accommodation for the need of others. It is entirely appropriate for the EMC to recognize that need and allocate resources in Jordan Lake accordingly.

We sincerely appreciate the opportunity to provide comments in this critical process and look forward to working with the State toward an economically and environmentally secure future for North Carolina.

Respectfully,

A handwritten signature in black ink, appearing to read "Seth Lawless". The signature is written in a cursive, flowing style.

Seth Lawless
Town Manager