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Director



NORTH CAROLINA
Environmental Quality

May 16, 2025

MEMORANDUM

To: Federal Emergency Management Agency
Division of Emergency Management

From: Richard Rogers, Jr., Director, Division of Water Resources *RR*

Subject: Clarification of Stream Debris Removal Guidance Post Helene

DISCLAIMER:

THE FOLLOWING MEMORANDUM IS INTENDED ONLY TO SERVE AS GUIDANCE AND TO SUMMARIZE BEST MANAGEMENT PRACTICES. IT IS NOT A RESTATEMENT OR SUMMARY OF ANY APPLICABLE LAWS OR REGULATIONS.

THIS DOCUMENT WAS PRODUCED INDEPENDENTLY BY THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY'S DIVISION OF WATER RESOURCES AND WAS NOT DEVELOPED IN CONJUNCTION WITH ANY OTHER FEDERAL OR STATE AGENCY, INCLUDING THE UNITED STATES ARMY CORPS OF ENGINEERS, NOR IS IT INTENDED TO REPRESENT THE POSITION OF ANY OTHER FEDERAL OR STATE AGENCY WITH RESPECT TO RECOMMENDED BEST MANAGEMENT PRACTICES.

Debris removal from streams is an important aspect of Western North Carolina's recovery from Hurricane Helene. The North Carolina Department of Environmental Quality – Division of Water Resources ("DWR"), updated its storm debris removal guidance in October 2024 to help those engaged in debris removal activities understand what activities are allowable without prior authorization from DWR. It also outlines best practices to minimize adverse impacts to North Carolina's water quality. That guidance can be found here: [*Guidelines for Debris/Sediment Removal in NC Streams and Wetlands After a Natural Disaster/Catastrophic Event*](#).

Since the issuance of that updated DWR guidance, the NC Wildlife Resources Commission ("NC WRC") has also issued debris removal guidance, which can be found here: [*Debris Removal and Channel Excavation Guidance for Western North Carolina Streams and Rivers, Post-Hurricane Helene*](#).

DWR has received several inquiries and complaints regarding work practices associated with debris cleanup occurring in Western NC waterways. In addition, it has become evident that the existence of different guidance issued by DWR and NC WRC has created some confusion about allowable



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activities and best practices. This memorandum seeks to provide clarification and to assist with decisions related to contractors.

Using the Guidance Documents

1. This memorandum, DWR's Guidance, and NC WRC Guidance/Fact Sheet should be reviewed by all equipment operators prior to performing storm debris clean up in or near waters of the state. Adherence to the guidelines in the following documents will help prevent violations of water quality standards:
 - a. DWR Memorandum: *Clarification of Stream Debris Removal Guidance Post Helene* March 2025 (This document).
 - b. NC DWR Document: [*Guidelines for Debris/Sediment Removal in NC Streams and Wetlands After a Natural Disaster/Catastrophic Event*](#). October 2024
 - c. NC WRC Guidance: [*Debris Removal and Channel Excavation Guidance for Western North Carolina Streams and Rivers, Post-Hurricane Helene*](#). March 2025
2. DWR's guidance outlines debris removal practices and describes best practices to minimize adverse impacts to North Carolina's water quality, while NC WRC's guidance describes best practices to protect aquatic habitats and minimize impacts to threatened and endangered species. The guidance provided by both entities serve consistent purposes – helping prevent water quality standard violations – and both should be followed.

Removal of Debris

3. Streams should not be cleared/dredged of *all* material within the channel. Stream substrate (rocks, wood, sticks, leaf litter, detritus) are natural and essential parts of healthy streams. Stream rock, cobble and large wood debris near banks provide natural erosion control and should be left in place to the maximum extent practicable.
 - a. Only excess storm-accumulated material impeding natural flow or threatening structures should be removed. Large woody debris embedded in streams or stream banks should be left in place.
 - b. Avoid excavation of streambeds beyond accumulated sediments and that change the bed elevation. Streams should not be straightened.
4. No live vegetation (trees, shrubs, etc.) should be removed from banks and floodplains unless it is necessary for an access point, or it endangers life or property. For access, the vegetation should be cut at ground level and allowed to regenerate after the work is completed.
5. Wholesale grading of stream banks should not occur. Grading required to provide equipment access is allowable when restricted to the minimum width necessary for access.

Work Operations

6. Streams and stream beds should not be used as a travel pathway for machinery, haul trucks or other equipment. Equipment should remain outside of surface waters except in limited circumstances in which it is necessary to enter the stream to remove storm debris.
7. Work in High Quality Habitat – NC WRC has identified areas of High Quality Habitat which have a high likelihood of rare or threatened and endangered species being present. Contractors can obtain maps of High Quality Habitat Areas and technical guidance for working in these sensitive areas by contacting NC WRC:
 - TR Russ (thomas.russ@ncwildlife.gov; (828-777-0495)
 - Luke Etchison (luke.etchison@ncwildlife.gov; (828-476-6137)

General

8. Operators should inspect and maintain all mechanized equipment operated near surface waters regularly to prevent contaminating stream waters from fuels, lubricants, hydraulic fluids or other toxic pollutants. Inspections should be recorded/documented. In accordance with N.C. Gen. Stat. §143-215.85(b), contractors shall report any petroleum spill of 25 gallons or more; any spill regardless of amount that causes a sheen on surface waters; any petroleum spill regardless of amount occurring within 100 feet of surface waters; and any petroleum spill less than 25 gallons that cannot be cleaned up within 24 hours. Report oil spills Monday-Friday 8 a.m.-5 p.m. to the appropriate [Regional Office](#). To report oil spills after hours or on weekends, call (800) 858-0368.

If you have any questions, please contact the appropriate regional office for the county in which you are working:

Storm-Impacted County	Regional Office Contact
Avery, Buncombe, Burke, Caldwell, Clay, Haywood, Henderson, Jackson, Macon, Madison, McDowell, Mitchell, Polk, Rutherford, Swain, Transylvania, & Yancey	Asheville Regional Office 828-296-4500
Alexander, Catawba, Cleveland, Gaston, & Lincoln	Mooresville Regional Office 704-235-2100
Alleghany, Ashe, Surry, Watauga, & Wilkes	Winston-Salem Regional Office 336-776-9800

cc: USACE
NCWRC
NCDNCR