

CATAWBA REGIONAL COUNCIL OF GOVERNMENTS  
SPECIAL EXECUTIVE COMMITTEE MEETING

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Catawba Regional Center  
Rock Hill, South Carolina  
August 21, 2024

Executive Committee Members:

Nettie Archie	Joe Branham, Vice Chair
Alston DeVenny	Todd Lumpkin
Charlene McGriff, Chair	Stacey Moore
Harold Thompson	Chad Williams
Leroy Worthy	

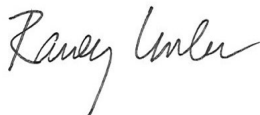
A special meeting of the Catawba Regional Council of Governments Executive Committee was conducted via email on August 21, 2024.

In May 2024, the Executive Committee and full COG Board of Directors were briefed in Executive Session about a proposed Charlotte Water Interbasin Transfer Certificate increase. The first opportunity for public comment expires at the end of August 2024, which is before the next Executive Committee meeting on September 10 and the full COG Board meeting on September 19. Catawba Regional staff proposes to comment at this time in conjunction with Santee Lynches and Central Midlands COGs, which will demonstrate a stronger and united front of the SC COGs in the Catawba Wateree Basin.

Executive Committee members were asked to review the attached proposed interbasin transfer comment letter and indicate by reply email whether he or she supports the letter being sent as public comment on behalf of Catawba Regional COG. Staff requested responses by Monday morning, August 26, 2024. Both Chair McGriff and Catawba Regional's legal counsel, Paul Dillingham, reviewed and approved the letter before dissemination to the rest of the Executive Committee.

Seven of nine Executive Committee members responded. With a quorum and a majority (seven members) of the Committee responding in the affirmative, the public comment letter will be signed and submitted to Charlotte Water, the North Carolina Environmental Management Commission, and the North Carolina Department of Environmental Quality. This action will be ratified by the approval of these Special Meeting Minutes at the Executive Committee's meeting on September 10, 2024.

Respectfully submitted,



Randy Imler  
Executive Director

attachment



August 20, 2024

Angela Charles, Director  
Charlotte Water  
[IBTProject@charlottenc.gov](mailto:IBTProject@charlottenc.gov)  
4222 Westmont Drive  
Charlotte, NC 28217

J.D. Solomon  
Chair  
North Carolina Environmental Management Commission  
c/o EMC Recording Clerk  
Robin Smith Law Office PLLC  
P.O. Box 2343  
Chapel Hill, NC 27515

Elizabeth S. Biser  
Secretary for Environment  
North Carolina Department of Environmental Quality  
217 West Jones Street  
Raleigh, NC 27603

Richard Rogers  
Director, Division of Water Resources  
North Carolina Department of Environmental Quality  
217 West Jones Street  
Raleigh, NC 27603

Re: Charlotte Water/City of Charlotte – Proposed Increase in Interbasin Transfer Certificate

Ladies and Gentlemen:

On behalf of the Catawba Regional Council of Governments, the Central Midlands Regional Council of Governments, and the Santee Lynches Regional Council of Governments, we are writing to express our concerns with, and opposition to, Charlotte Water's proposed increase in an Interbasin Transfer (IBT) Certificate from 33 million gallons per day to 63 million gallons per day.

*Catawba Regional  
Council of Governments  
PO Box 450  
Rock Hill, SC 29730*

*Santee Lynches Regional  
Council of Governments  
3219 Broad Street  
Sumter, SC 29150*

*Central Midlands  
Council of Governments  
236 Stoneridge Dr.  
Columbia, SC 29210*

Together, our South Carolina regions comprise twelve counties and a cumulative population of almost 1,500,000. Much of the population in our regions is reliant upon water from the Catawba-Wateree Basin, and many areas throughout our respective regions are experiencing rapid population and significant commercial and industrial growth.

The Catawba River and its tributaries are not an unlimited supply of water as evidenced by previous years of drought conditions in the Catawba-Wateree Basin in both North Carolina and South Carolina. The regions reliant upon water from the Catawba-Wateree Basin, both to the north and south of Charlotte/Mecklenburg (and including the Western Piedmont Region in North Carolina), are considered growth areas with likely additional water needs in the future. Interbasin transfers of the magnitude proposed by Charlotte Water will effectively subsidize growth in the benefitting area while depleting the limited and collective water resources of the entire Catawba-Wateree Basin.

Additionally, issues of sustainability and water quality are in question. Reducing the flow of the Catawba River by transferring water could lead to greater concentrations of pollutants in the basin which could negatively impact the river's natural ability to dilute and transport environmental hazards. This could have long-lasting and detrimental effects on aquatic ecosystems, recreational activities, and public health within the Catawba-Wateree River Basin.

In South Carolina, our Councils of Governments support the efforts of the Catawba-Wateree Water Management Group (CWWMG) as it actively works to update the water supply master plan for the entire river basin. It also is worth noting that to date Charlotte Water has been a member of the CWWMG. With the CWWMG work underway, it would be prudent for Charlotte Water to wait until the water supply master plan process is complete before proceeding further with any request to increase an existing IBT Certificate.

Furthermore, it is notable that previous studies for the Catawba River called for the elimination of interbasin transfers as a strategy to protect the river and water supplies during drought conditions. While this goal may be difficult to fully achieve in the short to mid-term, alternative and sustainable solutions should be on the table as all stakeholders consider use of water from a finite resource. Charlotte Water's request to almost double the amount allowed in its current IBT Certificate should only be considered, if at all, as an emergency and very temporary measure and only after Charlotte Water has taken steps to mitigate excessive unintentional water losses throughout its existing system. We also believe that further studies and new data were previously contemplated and agreed upon for this type of Certificate expansion request.

The 2015 Water Supply Master Plan for the Catawba-Wateree Basin projected Charlotte's current IBT would be sufficient through 2065. If Charlotte's growth should necessitate additional demand for water, Charlotte Water should explore alternative ways to conserve and preserve current supply, while enhancing existing water infrastructure and policies to preserve the water resources already available to the City of Charlotte and Mecklenburg County. This work could ultimately reduce future water demand even as Charlotte grows.

Water availability is crucial for sustaining economic development, agriculture, and quality of life in growing communities. If water is diverted elsewhere, it may constrain the ability of communities within the Catawba-Wateree Basin to support their own future development, population growth, and quality of

life. The regions adjacent to and downstream from Charlotte should not be forced to give up potential growth opportunities to subsidize Charlotte's growth with collective water resources. Although our regions are not in North Carolina, we are cognizant of the 2010 Settlement Agreement between North Carolina and South Carolina regarding Interbasin Transfers, particularly sub-paragraphs (a) through (e) and especially sub-paragraph (d).

With this in mind, at this time, and without further study and information, we respectfully oppose Charlotte Water's current request to expand its Interbasin Transfer Certificate to transfer 63 million gallons of water per day. Our Councils would be pleased to discuss this issue and our joint concerns with any of you. Together with the CWWMG, we look forward to working as stakeholders to find better collective solutions which may benefit all who use water throughout the Catawba-Wateree Basin.

With appreciation for your consideration of our regions' collective concerns about this issue,



Charlene McGriff  
Chair  
Catawba Regional Council of Governments



Will Brennan  
Chair  
Central Midlands Council of Governments



Sammie Tucker, Jr.  
Chair  
Santee Lynches Regional Council of Governments

cc: Myra Reece, Interim Director, SC Department of Environmental Services