



**DEPARTMENT OF THE ARMY**  
MOBILE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX 2288  
MOBILE, AL 36628-0001

**MAY 14 2008**

Inland Environment Team  
Planning and Environmental Division

Dr. Carol Couch, Director  
Environmental Protection Division  
Georgia Department of Natural Resources  
2 Martin Luther King Jr. Drive  
Suite 1152, East Tower  
Atlanta, Georgia 30334

Dear Dr. Couch:

I am writing in regards to your letter dated April 25, 2008, requesting that the U.S. Army Corps of Engineers (Corps), Mobile District, continue to temporarily modify water management operations at Buford Dam to meet a reduced water quality flow requirement in the Chattahoochee River at Peachtree Creek from an instantaneous daily value of 750 cubic feet per second (cfs) to 650 cfs until May 31, 2008. We recently completed our analysis of this request, including agency and basin stakeholder coordination, and determined that continuing this operation through May 31, 2008, would not result in long term significant environmental or human impacts. This determination is also based on incorporation of the monitoring and adaptive management plan during the implementation period.

During our recent coordination efforts, Georgia Environmental Protection Division (EPD) staff indicated that EPD may submit additional requests to continue the temporary reduced water quality flow requirement during the summer based on future conditions. Based on our recent discussions with U.S. Environmental Protection Agency (EPA), and EPD, there are several outstanding issues on which we will need additional information prior to completing our evaluation of any future requests to operate for the reduced water quality flow requirement during the summer months. These issues are:

- 1) The EPDRiv1 hydrodynamic and water quality model must be continually updated and compared to the continuous water quality data collected near Capps Ferry in order to verify that the model assumptions are appropriate and that outputs are appropriate for estimating impacts and predicting potential problem areas.
- 2) EPD must take additional efforts to estimate the instantaneous flow data in the Chattahoochee River immediately upstream of the confluence with Peachtree Creek. Potential methods include installation and maintenance of a real-time stream gage or providing real-time instantaneous water withdrawal data from the City of Atlanta water intake structure located immediately upstream of this point. The withdrawal data could be used in conjunction with the "Vinings" U.S. Geological Survey (USGS) gage No. 02336000 data to better estimate the instantaneous flows at Peachtree Creek.

3) EPD must provide a more detailed monitoring and adaptive management plan with clear triggers for returning the water quality flow requirement to 750 cfs during the summer months. This plan should include sharing monitoring data with the Corps and EPA weekly and verifying that the effluent discharges assumed in the model are accurate representations of actual discharges.

Due to the complexity of some of these issues, the considerable amount of time they may require, and the need for careful scrutiny of reduced minimum water quality flows during the summer months, I recommend that this effort be commenced as soon as possible so as not to delay the consideration of any future reduced water quality flow request. I also recommend that any additional request for reduced water quality flows be submitted well in advance of the desired implementation date to account for the time necessary to assess the request. As always, the Mobile District stands ready to assist in this effort wherever possible.

Sincerely,

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

R. Daren Payne  
Lieutenant Colonel  
Corps of Engineers  
Deputy Commander