



GWINNETT COUNTY
Department of Public Utilities
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January 5, 2007

Col. Peter F. Taylor
District Engineer
U.S. Army Corps of Engineers
109 St. Joseph St,
Mobile, Alabama 36602

RE: Comments on RPM3, Biological Opinion, Jim Woodruff Dam Interim Operations Plan

Dear Col. Taylor:

I attended the workshop held in Columbus, Georgia by your staff on December 13, 2006 on RPM3 of the Biological Opinion on the Interim Operations Plan (IOP) for Jim Woodruff Dam. Your staff asked for comments on the draft drought concept by January 10, 2007.

I am a Technical Assistant to the Director of the Gwinnett County Department of Water Resources. I have practiced as a Civil and Environmental Engineer in the water resources field for over forty years as an employee of NRCS, EPA and Gwinnett County.

My comments are based on the presentations by your staff at the workshop, the presentation of the EPD staff, the presentation of the ARC consultants, Dr. Dan Sheer and Dr. Megan Rivera of Hydrologics and review of the materials and methodologies presented. In the example model run presented by Dr. Sheer and Dr. Rivera the water demands of the metropolitan Atlanta area found in the Metropolitan North Georgia Water Planning District's Water Conservation and Water Supply Plan were used. Included in this plan is an aggressive water conservation program that is now being implemented.

I am now convinced that the Mobile District can do a much better job of managing the water in the ACF system to meet all project purposes, particularly protecting public health and safety, recreation in the lakes and protecting the endangered species below Jim Woodruff Dam than was demonstrated during calendar year 2006. I also believe that the Mobile District can develop a revised IOP and a future Operating Plan to provide to the U.S. Fish and Wildlife Service that will satisfy the requirements of the Endangered Species Act and store more water in the system during 2007 and future years than occurred in 2006.

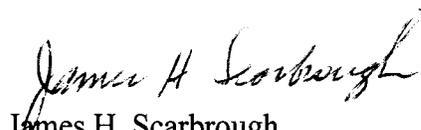
It seems very clear to me that releases above 10,000 cfs are not beneficial for sturgeon spawning habitat and are of little or no value to the mussels. The methodology presented by Hydrologics of predicting the water available statistically and then subtracting the necessary amounts to meet the mandated uses and then storing the remaining amounts is very straightforward and logical.

I believe that making sure the lakes are full by June 1 of each year is very important for recreational uses and preserves water for future droughts without endangering the protected biology below Jim Woodruff Dam. The apparent excess releases by the COE during 2006 seem detrimental to the system and its purposes, as well as contrary to common sense and detrimental to the biology in the lakes and the recreational values associated with having lakes maintained at the highest levels possible during the main recreational season.

I urge you to use the methodology presented by Hydrologics to develop a revised Interim Operations Plan that will optimize the water available to better serve all project purposes and users of the ACF system, as well as, protect the endangered species.

Thank you for the opportunity to participate in the development of the revised Interim Operations Plan. The workshop in December, 2006 was a valuable tool in keeping us informed of the issues and your progress on these issues of vital importance to our county. Please continue to keep stakeholders informed and allow our input in similar forums for the future.

Sincerely,



James H. Scarbrough
Executive Technical Assistant
Gwinnett County Water Resources Department

C: Chairman Bannister
Jock Connell
Frank Stephens
Pat Stevens/ARC
Carol Couch/EPD
William Droze/Troutman Sanders LLC
Gregory Blount/Troutman Sanders LLC