

FINDING OF NO SIGNIFICANT IMPACT
GEORGIA ENVIRONMENTAL PROTECTION DIVISION PROPOSAL FOR A
TEMPORARY REDUCED MINIMUM WATER QUALITY FLOW IN THE
CHATTAHOOCHEE RIVER AT PEACHTREE CREEK FOR DROUGHT CONTINGENCY
WATER MANAGEMENT OPERATION IN THE ACF RIVER BASIN AND TEMPORARY
WAIVER FROM ACF WATER CONTROL PLAN

1. PROPOSED ACTION:

The proposed action was initiated in the form of a letter dated 10 October 2008 addressed to the Corps Mobile District Commander Colonel Byron Jorns, from Dr. Carol Couch, Director, Georgia Environmental Protection Division (EPD). The proposed action is to temporarily reduce the water quality flow requirement at Peachtree Creek, which would allow the immediate reduction in water quality releases from Buford Dam in order to meet a reduced minimum flow measured at Peachtree Creek from an instantaneous daily flow value from 750 cubic feet per second (cfs) to 650 cfs and continue to operate for this value during the cooler water months until as late as 30 April 2009. Beginning 1 May (or earlier if monitoring data determines higher flows are necessary to meet water quality standards), releases for water quality from Buford Dam would be made to meet a minimum instantaneous daily flow value of 750 cfs. The proposed action also includes a temporary waiver from the existing ACF Water Control Plan to allow a reduction in the minimum flow agreement which specifies maintenance of a minimum instantaneous daily flow value of 750 cfs in the Chattahoochee River measured just upstream of the confluence with Peachtree Creek. This request is similar to the EPD request granted during the months of March – May 2008, which they determined were successful in conserving storage in Lake Lanier and did not result in adverse effects to water quality or water intakes below the dam. Consistent with previous requests, the EPD has agreed to use a monitoring and adaptive management approach regarding the minimum water quality flow requirement as actual water quality data is collected and as other actual data and information become clear. In addition, the Corps will coordinate closely with the Atlanta Regional Commission (ARC) regarding daily withdrawals for the City of Atlanta intake in order to ensure that we are making releases that provide at least the minimum flow at Peachtree Creek at all times.

2. ALTERNATIVES CONSIDERED:

1. “No Action” Alternative (Alternative 1)

The Council on Environmental Quality (CEQ) regulations require analysis of the “no action” alternative 40 C.F.R. § 1502.14. Based on the nature of the proposed action, “no action” represents “no change” from the current water management practices at Buford Dam, and no change from the existing minimum flow requirements described in the Apalachicola Basin Reservoir Regulation Manual-Appendix B - Buford Dam (1991) would be made. Therefore, under the “no action” alternative, the Corps would continue to make releases from Buford Dam in order to meet the 750 cfs instantaneous minimum daily flow value at Peachtree Creek. This alternative fails to take advantage of the cool weather months allowing for a reduction on the demand of valuable stored water in Lake Lanier. Therefore, additional alternatives were

considered.

2. Additional Conservation (Alternative 2)

This alternative represents the implementation of additional water conservation requirements by EPD on water suppliers and users. The EPD provided information regarding three currently ongoing major initiatives aimed at reducing water demand in the Chattahoochee and Flint River Basins in Georgia. Two of these initiatives primarily focus on implementing longer-term conservation water management planning, 1) water planning by the Metropolitan North Georgia Water Planning District, and 2) implementation of the State-wide Water Management Plan. The third initiative, the Level IV Drought Response Measures currently in effect in 55 North Georgia counties, has successfully reduced short-term water demands. In response to extreme drought conditions throughout the northern one-third of Georgia, the Director of EPD, in consultation with the State Drought Response Committee and the State Climatologist, imposed Level IV outdoor watering restrictions throughout the 55 counties Level IV Drought Response Area beginning in September 2007. Under Level IV most outdoor water use is banned or severely restricted. In addition to imposing Level IV watering restrictions, from November 2007 through March 2008, EPD also ordered all permitted water supply systems in the Level IV area to reduce their water use by at least 10% when compared to the same period for the previous year. Since November 2007 water use in the Level IV area has been reduced by an average of 16% when compared to the same period for the previous year. Metro-Atlanta water systems that get their water from the Chattahoochee River or Lake Lanier have been under the most stringent outdoor water use restrictions. As a result, during the period of May 2008 through September 2008, metro water users reduced water use by an average of 23% when compared to the same period for the previous year. The additional improvements to water conservation and lower demand envisioned in the other two initiatives are not immediately implementable and do not address the urgent need to conserve storage in Lake Lanier now. EPD has also determined that imposing additional restrictions and/or lowered demands within the Level IV Drought Response Measures is not feasible at this time. Therefore, additional alternatives were considered.

3. Refine River Management System (Alternative 3)

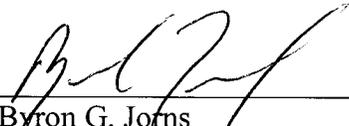
This alternative represents a refinement of the current "River Management System" agreement established in 1986 in order to avoid over releases and conserve storage. Under the agreement, the Corps whenever possible and practical would endeavor to make only those releases specifically required for water supply and maintaining the 750 cfs minimum instream flow at Peachtree Creek. Georgia Power Company agreed to continue to use Morgan Falls reservoir to re-regulate Buford releases. Corps staff has identified two refinements that could improve our ability to meet the intention of the agreement and conserve storage. The first refinement requires the ARC to provide water supply projections more frequently than the current 7-day time step. The current time step locks Georgia Power Company, per Federal Energy Regulatory Commission (FERC) license requirements, into minimum daily releases that do not account for precipitation events and intervening tributary inflows that were unanticipated at the time the projection was made. A 2-3 day time step would allow for more updated projections and a subsequent savings in storage at Morgan Falls and accordingly Lake Lanier. The second refinement requires real-time water withdrawal data from the City of Atlanta intake located immediately upstream of the confluence with Peachtree Creek. Currently the Corps receives the

water withdrawal data as a daily average for the previous day. If the data were available real-time, it could be used in conjunction with the discharge values reported real-time at the U.S. Geological Survey (USGS) Vinings gage located immediately upstream of the City of Atlanta intake to monitor the flow at Peachtree Creek and ensure the 750 cfs minimum instream flow and water supply needs are being maintained without superfluous releases from storage. These refinements in operations to meet flow targets could save significant storage in Lake Lanier; however, they would require a long term commitment of resources and management in order to work effectively. Currently the other parties to the agreement lack the resources and/or commitment to implement these refinements. Therefore, this alternative was not considered further.

3. FACTORS CONSIDERED IN DETERMINING THAT NO ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED: As described in the attached EA, the proposed action will not significantly impact resources in the project area. Resource areas considered in the impacts analysis include physical habitat, land use changes, historic and archaeological resources, fishery and wildlife resources, essential fish habitat, threatened and endangered species, recreation, hydrology, water quality and supply, flood control, navigation, hydropower, floodplain and wetland resources, and aesthetics. The proposed action is intended to preserve storage in Lake Lanier by making allowances for increased storage opportunities and/or reductions in the demand of storage in order to provide continued support to project purposes; minimize impacts to municipal and industrial water supply, water quality, and fish and wildlife conservation; and provide greater assurance of future sustained flows for species and other users during a severe multi-year drought, currently being experienced in the ACF basin. The proposed action constitutes a short-term use of man's environment and does not prohibit the maintenance and enhancement of long-term productivity in the project area.

4. CONCLUSIONS: The proposed action was coordinated with Federal, State, and local agencies, Tribes, affected industries, organizations, other stakeholders and the public regarding potential affects. An evaluation of the Environmental Assessment describing the proposed action shows that the action would have no long term significant environmental or human impacts. Therefore, an environmental impact statement is not required.

DATE: 14 NOV 08


Byron G. Joins
Colonel, Corps of Engineers
District Commander