

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Glenn Brown

**Affiliation:**

### Contact Information

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**Address:**

113 County Road 932

Cedar Bluff, AL 35959

**County:** Cherokee

**Phone:** 256-422-5140

**Email:** lowe2220@tds.net

### Comment Metadata

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**Comment Number:** 2013-0001

**Date:** 3/21/2013 8:31:43 PM

**Interest:**

**Resource Area:** Biological Resources,Cultural Resources,Data, Studies, & Analytical Tools,Drought Operations,Flood Risk Management,Hydropower,Navigation,Water Managem

**Attachments:**

### Comments:

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I would like to see the winter pool elevation on Weiss Lake raised by 3 feet to elev. 561 as requested by Alabama Power Co. in their permit application. Carters Lake was built in the 70's providing additional flood control after Weiss Lake was opened in 1961. I have spent my whole adult life on Weiss Lake and know that flooding has decreased since Carters Lake was built. The impact on the citizens and business in Cherokee County would be tremendous,it would make Weiss Lake usable year round and would allow business to survive the winter draw down. I understand that Weiss Lake was built for power generation and flood control, but having Carters Lake and Lake Allatoona upstream in Georgia has changed the flood characteristics of Weiss Lake.

Your consideration in this matter is appreciated.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Randall Foster

**Affiliation:**

### Contact Information

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**Address:**

2768 Old Summerville Road

Armuchee, GA 30105

**County:** GA

**Phone:** 709-506-9907

**Email:** randyfoster@comcast.net

### Comment Metadata

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**Comment Number:** 2013-0002

**Date:** 3/24/2013 1:22:26 PM

**Interest:**

**Resource Area:** Water Management Recommendations

**Attachments:**

### Comments:

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Keep lake Weiss level up to 562 feet at lest during winter.Have a camper and 3 lots on lake.We cannot get our boat off our boat lift if water is below 562.A lot of spring and fall fishing is lost because I cannot get boat in water off lift.Thanks you very much,Randy Foster

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Warney Conley

**Affiliation:**

### Contact Information

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**Address:**

2782 Shetland lane  
Kennesaw, GA 30152

**County:** Cobb

**Phone:**

**Email:**

### Comment Metadata

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**Comment Number:** 2013-0003

**Date:** 3/24/2013 2:49:34 PM

**Interest:**

**Resource Area:** Water Management Recommendations

**Attachments:**

### Comments:

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The winter levels on lake weiss uhare too low.

3 feet down from summer pool would be very beneficial

To the entire lake community.

Cherokee co. Ala. needs a good economical boost.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Bill Brumbelow

**Affiliation:**

### Contact Information

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**Address:**

9543 Poplar Court  
Douglasville, GA 30135

**County:** Douglas

**Phone:** 404-372-0615

**Email:** billbrumbelow@ymail.com

### Comment Metadata

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**Comment Number:** 2013-0004

**Date:** 3/24/2013 3:19:29 PM

**Interest:**

**Resource Area:** Socioeconomics & Recreation

**Attachments:**

### Comments:

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My wife and I own two pieces of property on Weiss Lake. We believe it is very important that the winter pool level only be dropped by 3 feet or less. The Cedar Bluff and Centre Commumnities need this to promote more people coming all year around for fishing and boating. This is a very important part of the revenue for this area.

This area has been hard hit by the current economic situation and only lowering the water by three feet instead of six would help almost all of the merchants in one way or the other. Please don't let this be a rumor any more. Please make a new ruling to lower the level by only three feet or less.

Thank you for your assistance in this matter.

Bill and Leah Brumbelow

1090 County Road 131, Cedar Bluff, AL

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Chris Baerman

**Affiliation:**

### Contact Information

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**Address:**

5515 Awtrey Church Rd NW

Acworth, GA 30101

**County:** Cobb

**Phone:**

**Email:** cbaerman@sbcglobal.net

### Comment Metadata

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**Comment Number:** 2013-0005

**Date:** 3/24/2013 9:28:37 PM

**Interest:**

**Resource Area:** Drought Operations, National Environmental Policy Act, Socioeconomics & Recreation, Water Management Recommendations, Water Supply

**Attachments:** Allatoona Lake Impact.doc

### Comments:

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Why does USACE not hit the targeted water levels published for Allatoona Lake?

Why does USACE eliminate from consideration any changes in the conservation pool level or the winter pool level? Seems those two parameter are the most crucial constraints affecting all the lake's authorized purposes.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Thomas Foster

**Affiliation:** Lake Allatoona Association

### Contact Information

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**Address:**

4480 Old Grogan Rd.

Acwothr, GA 30101

**County:** Cobb

**Phone:** 770-974-1456

**Email:** tfos777@comcast.net

### Comment Metadata

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**Comment Number:** 2013-0006

**Date:** 3/24/2013 11:28:42 PM

**Interest:**

**Resource Area:** Drought Operations,Flood Risk Management,Water Quality,Water Supply

**Attachments:** Lake Allatoona.doc

### Comments:

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The main purpose of Lake Allatoona has changed over the last 60 years. It was built for flood control and power generation but now serves a much more important function - it is a drinking water reservoir serving approximately one million people. This purpose transcends flood control and power generation, especially since there has been no threat of flooding for the past 33 years that I have been familiar with and using the lake - even when the lake rose 15ft. in October during storms 5-6 years ago to 855.

The lake has been paid for many times over with the amount of power generated over the last 60+ years. The most essential demand on the lake is now water quantity and quality as a drinking water resource. How can the COE ignore this precedence when over a million people depend on this lake for their drinking water supply? This far outweighs its original purpose. Water quantity and quality go hand in hand. It makes no sense to draw the lake down 17ft, in the winter when you have the same amount of pollution and runoff coming in when it is at full pool. The development around the lake in the last 15 years alone dictate changes in the way the lake is managed.

The Rule Curve which dictates lake levels at different times of year is outdated and there is no reason to operate the lake the same way as 50 -60 years ago.

Most people would rather pay a little more on their electric bill than see the lake being pulled down in June and July to generate power. They would rather be seeing better water quality coming to their home and not have to worry about greater concentrations of pollution, especially types the water treatment plant cannot remove(hydrocarbons,leachate from landfills, urine,prescription drugs, certain bacteria, etc.). The politicians use buzz words like highly treated wastewater being returned to the lake -

## Online Comments – 2013 ACT DEIS

that is not happening- The pollutants mentioned above are passing right through the wastewater plant and right back to the lake.

I fail to understand why other states feel they are entitled to water from Lake Allatoona during drought conditions - we are not manufacturing water on Lake Allatoona! If there is no rain or inflow to the lake, there should not be more water discharged than is coming in - power generation should be curtailed in times of drought to maintain water quality.

The COE was commissioned to manage the lake for a different purpose. It is now time to recognize it must serve a greater purpose and manage it as a drinking water reservoir for one million people.

Lake Martin has no right to request raising their lake 2-3ft. at the sacrifice of lowering Allatoona. As we monitored lake levels and generation schedules last year, was there any reason Lake Logan Martin was down only 1 ft. while Allatoona was down 5ft. during drought conditions? Is the populace of Logan Martin and Lake Martin greater or more important than the populace that depends on Allatoona?

What right does Gwinnett County have to request water from Lake Allatoona when they have Lake Lanier as a resource. Why would Governor Nathan Deal even consider that proposition? Has anyone considered less development when resources like water are not available? Should the people that depend on Allatoona for their drinking water be sacrificed for people deemed more important?

Water is too important to become a political football. One million people have a significant voice.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Terri Nelson

**Affiliation:**

### Contact Information

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**Address:**

10 Brittany Lane

Rome, GA 30161

**County:** Floyd

**Phone:**

**Email:** terrinelson10@comcast.net

### Comment Metadata

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**Comment Number:** 2013-0007

**Date:** 3/25/2013 8:23:29 PM

**Interest:**

**Resource Area:** Flood Risk Management

**Attachments:**

### Comments:

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It is dangerous for the lake Weiss to be too low on the water level. Earlier this year, in a fishing tournament, a fisherman had to be sent to the hospital for hypothermia due to his boat getting stuck on ground in too shallow water. Draining 6 foot is too low. Needs to stay at full pool or just 3 foot drop.

Too difficult to launch boat or pull boat onto ramp, when your motor is dragging dry ground.



## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Steve Nelson

**Affiliation:** Home owner

### Contact Information

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**Address:**

714 County Rd 711  
Cedar Buff, GA 35959

**County:** AL

**Phone:** 404-406-0958

**Email:** jr\_bentley@me.com

### Comment Metadata

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**Comment Number:** 2013-0008

**Date:** 3/25/2013 8:26:40 PM

**Interest:**

**Resource Area:** Water Management Recommendations

**Attachments:**

### Comments:

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Dear WCM, I want to offer my support for any initiative that will increase the year-round water level of the lake. This would allow all the residents and visitors to use the lake year round. Area businesses would also benefit from this utility.

Thanks.

Steve Nelson

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** H.D. Nelson

**Affiliation:**

### Contact Information

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**Address:**

50 Gibbons Road  
Taylorsville, GA 30178

**County:** Bartow

**Phone:**

**Email:** deannelson1258@yahoo.com

### Comment Metadata

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**Comment Number:** 2013-0009

**Date:** 3/25/2013 8:28:44 PM

**Interest:**

**Resource Area:** Flood Risk Management

**Attachments:**

### Comments:

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I think the lake needs to stay at full pool or just drop 2 feet. 6 foot is way too low to drop it. Everybody could enjoy it more if you just drop it 2 feet. I've had to help people get unstuck from too shallow waters.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Joy Cordle

**Affiliation:**

### Contact Information

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**Address:**

1557 Old Rockmart Road

Silver Creek, GA 30173

**County:** Floyd

**Phone:**

**Email:**

### Comment Metadata

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**Comment Number:** 2013-0010

**Date:** 3/25/2013 8:32:28 PM

**Interest:**

**Resource Area:** Flood Risk Management

**Attachments:**

### Comments:

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Please stop dropping the water at Lake Weiss too low. On my day off, if I go to the lake, and the water is too low, I have ruined my day off.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Dean Nelson, Jr.

**Affiliation:**

### Contact Information

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**Address:**

714 County Road 711

Cedar Bluff, AL 35959

**County:** Cherokee

**Phone:**

**Email:**

### Comment Metadata

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**Comment Number:** 2013-0011

**Date:** 3/25/2013 8:35:24 PM

**Interest:**

**Resource Area:** Flood Risk Management

**Attachments:**

### Comments:

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I live on the lake Weiss, I would like to see the lake stay at full pool, where I could use it more often. It gets too low, I can not get my boat out. I like using the lake for fishing or boating.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Robert Brown

**Affiliation:**

### Contact Information

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**Address:**

344 Warren Road N.E.

Rome, GA 30165

**County:** Floyd

**Phone:** 706-234-2317

**Email:** N/A

### Comment Metadata

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**Comment Number:** 2013-0012

**Date:** 3/25/2013 9:00:48 PM

**Interest:**

**Resource Area:** Drought Operations,Flood Risk Management,Hydropower,Navigation,Socioeconomics & Recreation,Water Management Recommendations,Water Quality,Water Supply

**Attachments:**

### Comments:

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I would like to see the winter pool raised by 3 feet. I feel that this would be an economic and recreational boost for N.W. Georgia and N.E. Alabama. I feel that flood control impact would be minimal.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Doug Brown

**Affiliation:**

### Contact Information

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**Address:**

4 Harbour Rd. N.E.

Rome, GA 30165

**County:** Floyd

**Phone:**

**Email:**

### Comment Metadata

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**Comment Number:** 2013-0013

**Date:** 3/25/2013 9:03:29 PM

**Interest:**

**Resource Area:** Socioeconomics & Recreation, Water Management Recommendations

**Attachments:**

### Comments:

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The winter lake level for Weiss Lake should be raised to elev. 561 It would make our lake more usable during winter months.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Jeff Mitchell

**Affiliation:**

### Contact Information

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**Address:**

County Road 711

Cedar Bluff, AL 35959

**County:** Cherokee

**Phone:** 678-363-9558

**Email:** jeffm116@bellsouth.net

### Comment Metadata

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**Comment Number:** 2013-0014

**Date:** 3/25/2013 9:07:48 PM

**Interest:**

**Resource Area:** Water Supply

**Attachments:**

### Comments:

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We have a lot on Lake Weiss and are concerned that the water levels are not maintained at a higher level longer throughout the year. There have been many times that Labor Day weekend in Sept has proven to be almost dry in some parts of the lake. This is concerning not only for the use of the lake, but for property values as well.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Richard Cantrell

**Affiliation:**

### Contact Information

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**Address:**

County Rd. 711

Cedar Bluff, AS 35959

**County:** Cherokee

**Phone:** 770-560-7232

**Email:** rcantrell@conlancompany.com

### Comment Metadata

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**Comment Number:** 2013-0015

**Date:** 3/26/2013 3:58:17 PM

**Interest:**

**Resource Area:** Water Supply

**Attachments:**

### Comments:

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Water levels are too low in the fall.



## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Ann Butler

**Affiliation:**

### Contact Information

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**Address:**

714 county road 711

Cedar bluff, AL 35959

**County:** cherokee

**Phone:**

**Email:** reltub2003@yahoo.com

### Comment Metadata

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**Comment Number:** 2013-0016

**Date:** 3/26/2013 8:59:13 PM

**Interest:**

**Resource Area:** Water Management Recommendations

**Attachments:**

### Comments:

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Please maintain higher water level year round.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Glenn Brown

**Affiliation:**

### Contact Information

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**Address:**

113 County Road 932

Cedar Bluff, AL 35959

**County:** Cherokee

**Phone:**

**Email:**

### Comment Metadata

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**Comment Number:** 2013-0017

**Date:** 3/26/2013 9:47:57 PM

**Interest:**

**Resource Area:** Flood Risk Management, Navigation, Socioeconomics & Recreation, Water Management Recommendations, Water Supply

**Attachments:**

### Comments:

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I was very disappointed with the ACT meeting held in Rome, Ga. on March 26. The ACT meeting should have been named the GAC meeting, Georgia Allatoona Carters meeting. Nothing of concern or benefit to Alabamas lakes were available, so shy call it Alabama Coosa Tallapoosa. All I heard was we don't control Alabama Power Lakes(so why are you involved in our water control manual?)

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Bob Taylor

**Affiliation:**

### Contact Information

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**Address:**

PO Box 295

Cedar Bluff, AL 35959

**County:** AL

**Phone:** 256-779-8183

**Email:** btaylor001@tds.net

### Comment Metadata

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**Comment Number:** 2013-0018

**Date:** 3/27/2013 8:11:57 AM

**Interest:**

**Resource Area:** Water Supply

**Attachments:**

### Comments:

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The people of Cherokee County have been hoping for several years that the Winter level of our lake would be raised from 6' low to 3' low. This would cause a significant increase in tourism during the winter months. This would benefit the local economy significantly. Many of our businesses suffer financial losses during the winter months, and many cannot survive the loss of tourism business. More fishermen would mean more tax revenue to help our community build better schools, and public services.

Alabama Power has recommended this change, and we now understand that the COE has decided that it will not happen.

Keeping our water levels up would also help maintain a better water quality for the public to use.

1 PUBLIC COMMENTS  
2 ABOUT DRAFT ACT WATER CONTROL MANUAL AND  
3 DRAFT EIS TO BECOME PART OF PUBLIC RECORD

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14 Held at the Old Pitman Theater,  
15 Broad Street, Gadsden, Alabama, on the 27th  
16 day of March, 2013, at 4:00 p.m.

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22 REPORTED BY:  
23 Robin Reynolds, CCR

24 Board Certified Court Reporter

1 MR. MIKE RILEY:

2 I'm Mike Riley, R-I-L-E-Y. And

3 I'm the President of Logan Martin Lake

4 Protection Association.

5 And the comment that I would

6 like to make would be that LMLPA very much

7 would love to see the variance on Logan

8 Martin raised two feet at winter drawdown,

9 and that we are going to pursue that

10 further with Alabama Power and advise the

11 Corps of Engineers of us doing so.

1 PUBLIC COMMENTS  
2 ABOUT DRAFT ACT WATER CONTROL MANUAL AND  
3 DRAFT EIS TO BECOME PART OF PUBLIC RECORD

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22 REPORTED BY:

23 Robin Reynolds, CCR

24 Board Certified Court Reporter

13 MR. JERRY JOHNS:

14 Located at 320 Embos Island

15 Street, Leesburg, Alabama. I want you to

16 leave the water on, keep the water up and

17 not pull it down over three feet.

18

19 (WHEREUPON MR. BILL WHITMIRE INTERJECTED

20 THAT HIS COMMENT WOULD BE THE SAME AS

21 MR. JOHNS.)

22

23 MR. JOHNS:

24 That's the biggest problem,

25 sure enough, the water fluctuating; bring

3

1 it up, then pull it down, pull it up. We

2 would like to see it drop in the fall, and,

3 in the spring, bring it back up, but not

4 over three feet. Our goes down like six or

5 seven feet. I just don't see where they

6 need to do that. I feel like it's hurting

7 everything. Fishing has got real bad in

8 the last couple of years. I don't know

9 whether the current won't stay in long

10 enough for them to spawn or what the deal

11 is. But we are just not catching fish.

12 That's it.



1 PUBLIC COMMENTS  
2 ABOUT DRAFT ACT WATER CONTROL MANUAL AND  
3 DRAFT EIS TO BECOME PART OF PUBLIC RECORD

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15 Broad Street, Gadsden, Alabama, on the 27th  
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22 REPORTED BY:

23 Robin Reynolds, CCR

24 Board Certified Court Reporter

MR. WILLIAM JIMMY COPELAND:

15            Located at 361 Bay Point Drive,  
16 Rainbow City, Alabama. On Neely Henry  
17 shore. I'm a member the Neely Henry Lake  
18 Association. I've worked with the Lake  
19 Association in addressing the re-licensing  
20 with Alabama Power on getting the FERC  
21 re-licensed, Federal Energy Regulatory  
22 Commission.

23            And we've worked on that for  
24 about five years. And they still haven't  
25 got the license, waiting on this

1 environmental impact statement to be  
2 approved. And all I want to say is, I am  
3 very familiar with the revised Corp  
4 information, the manual, and the revised  
5 lake level for Neely Henry. On the lake  
6 level for Neely Henry is 507 in the winter  
7 and 508 in the summer. And we have tested  
8 that out for decades, and it's worked, and  
9 nobody has got flooded out as a result.  
10 It's increased available water and  
11 recreation. It's a win-win for everybody.  
12 There is no downside, no bad environmental  
13 impacts or anything.  
14       So I just would like to see  
15 them get on with the program, get the  
16 license to Alabama Power Company, and  
17 approve this environmental impact  
18 statement, revise those temporary curves  
19 that we have been operating on for about  
20 ten years, over ten years now, and get on  
21 with the show.

1 PUBLIC COMMENTS  
2 ABOUT DRAFT ACT WATER CONTROL MANUAL AND  
3 DRAFT EIS TO BECOME PART OF PUBLIC RECORD

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14 Held at the Old Pitman Theater,  
15 Broad Street, Gadsden, Alabama, on the 27th  
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22 REPORTED BY:  
23 Robin Reynolds, CCR

24 Board Certified Court Reporter

23 MR. HAP BRYANT:

24 Located at 4740 Crimson Sage

25 Drive, Southside, Alabama.

5

1 I'm in the Neely Henry Lake

2 Association. My comment is the Corp is

3 doing a wonderful job. We are well pleased

4 and we'll real proud of the winter water

5 level variance in the flow for the

6 wintertime. It has worked out and hs been

7 100 percent win-win for everybody.

8 And our only concern is future

9 dams that Georgia is building on Etowah and

10 Carter -- whatever river goes into Carter.

11 They've got a lot of it. And they also

12 interbase and transfer of water. They are

13 doing that out of Altoona feeding Marietta.

14 It's been going on for years.

1 PUBLIC COMMENTS  
2 ABOUT DRAFT ACT WATER CONTROL MANUAL AND  
3 DRAFT EIS TO BECOME PART OF PUBLIC RECORD

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14 Held at the Old Pitman Theater,  
15 Broad Street, Gadsden, Alabama, on the 27th  
16 day of March, 2013, at 4:00 p.m.

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22 REPORTED BY:

23 Robin Reynolds, CCR

24 Board Certified Court Reporter

16 MR. KEN SWAFFORD:

17 My name is Ken Swafford. I

18 live in Riddles Bend on the Neely Henry

19 Lake. I've lived there for 37 years.

20 And I'm here to tell the Corp

21 of Engineers that I appreciate what they

22 are doing, appreciate the impact study,

23 very glad that the rule curve was changed

24 on winter pool from 505 to 507. And I

25 think that will make our lake much safer,

1 much more boat friendly, and increase the  
2 property values of our homes on the water,  
3 and just make the all-around lake a better  
4 experience to live on, to fish on, and to  
5 work on. And I'm here just to thank them  
6 for that.



## Public Meeting Computer Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Kelly Stephens

**Affiliation:** Neely Henry Lake Association

### Contact Information

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**Address:**

169 Wilson Drive

Gadsden, Alabama 35901

**County:** Etowah

**Phone:**

**Email:** kms4653@bellsouth.net

### Comment Metadata

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**Comment Number:** 2013-0024

**Date:** 3/27/2013

**Resource Area:** Recreation Water Quality & Quantity

### Comments:

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First, I would like to express my appreciation for the Corps' support for making permanent the 507' winter pool level for Neely Henry Lake. This is a positive for our area in economic and recreational terms, as well as for property values. Also, I want to complement the Corps on its maintenance of high quality facilities on the reservoirs it manages. Finally, I want to say that I appreciate what a daunting task it is to manage, to the satisfaction of all water users, the flows and water levels on the river systems and reservoirs that the Corps manages, especially with the variability of the weather.

## Public Meeting Computer Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Tom Littlepage

**Affiliation:** Alabama Office of Water Resources

### Contact Information

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**Address:**

401 Adams Ave. Suite 434

Montgomery, Alabama 36104

**County:** Montgomery

**Phone:**

**Email:** tom.littlepage@adeca.alabama.gov

### Comment Metadata

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**Comment Number:** 2013-0025

**Date:** 3/27/2013

**Resource Area:** Other Public information

### Comments:

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Rrequest that all the posters and display maps used in the public forums be uploaded to the web site.

**From:** [Mike Bearden](#)  
**To:** [ACT-WCM](#)  
**Subject:** ACT Master Water Control Manual Update Comment  
**Date:** Wednesday, April 03, 2013 10:13:26 PM  
**Attachments:** [CORPS Cobb Forum Question.pdf](#)

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This is to submit as an attachment the comment that I submitted in draft form to the Kennesaw open house recorder on March 25; minor edits to comport to context.

Thank you for your courtesies and information.

Mike Bearden

My name Mike Bearden, of Bartow County. My water utility provides my family's water supply from the lake, my local electricity provider is supplied power from the lake, former professional industrial sector clients and employers of mine depend on outflows from the lake, the Lake serves as a very important recreational/quality of life factor for my family, my friends and me, and I am a director of LAA – I comment and ask a two-part question because Allatoona Lake has always been a vitally important part of so much of my life and my community's quality of life.

The CORPS has a serious responsibility with the overriding flood risk management task of Allatoona Lake. Nothing that I believe or seek is offered to compromise that task at all - the CORPS maintains a single-minded focus to that vital task. However given the now enormous value that our Lake water has to literally over a million people for water supply and recreational quality of life, changes are in order from the way things have been done in attention to that task since 1950, to the detriment of other valuable purposes.

In 1950, the CORPS best weather forecasting tools derived from past history and the Farmers Almanac, today NOAA routinely provides 2 to 3 week advance notice of major rain-making systems. In 1950 the CORPS hydrologic models were maintained with slide rules and nomographs, today the CORPS has online access to hundreds of real time stream flow gauges and sophisticated HEC RAS runoff models. In 1950, rural Bartow, Cherokee , Cobb and Paulding Counties' populations totaled less than 100,000 people and the value of a unit volume of water for use was insignificant. Today the Lake is directly surrounded by over 1 million people who are paying about \$5 dollars for every 1000 gallons of water.

In light of these enormous changes, please explain what the CORPS does different from what it established over 60 years ago to not only manage flood risks but also to conserve and not wastefully dump water to the ocean when it can be used to balance the Lake's water supply and recreational purposes. Secondly and related, please explain why winter, spring and summer Lake pool level changes were pointedly excluded from the WCM update, when modern-day management practices and technological advancements could be leveraged for just small proactive tweaks across dated CORPS practices to improve lake levels and significantly serve regional water supply and recreational purposes through conservation of now-wasted water; without increasing flood risks that were foreseen in 1950.

Subject: ACT Comments (Weiss Lake) Water Control Manual

I have been using Weiss Lake for recreational purposes for 50+ years. I would recommend raising the winter pool level on Weiss Lake by 3 feet to elev. 561. I feel that flood control which Weiss Lake was built for in the early 60's would not be affected. Carters Lake in North Georgia was built in the 1970's after the original Water Control Manual for Weiss Lake was developed. Carters Lake added a measure of flood control coming into Weiss Lake in addition to that offered by Lake Allatoona. Historical Data should show that flooding on Weiss Lake has been greatly reduced since Carters Lake was constructed. I have personally seen a reduction in flooding in my 50+ years on the lake. The economic impact on N.E. Alabama and N.W. Ga. Would be tremendous by making Weiss Lake usable year round, it would allow business to thrive due to year round use, whereas business cannot survive due to a lack of users on the lake because of the 6 foot winter draw down.

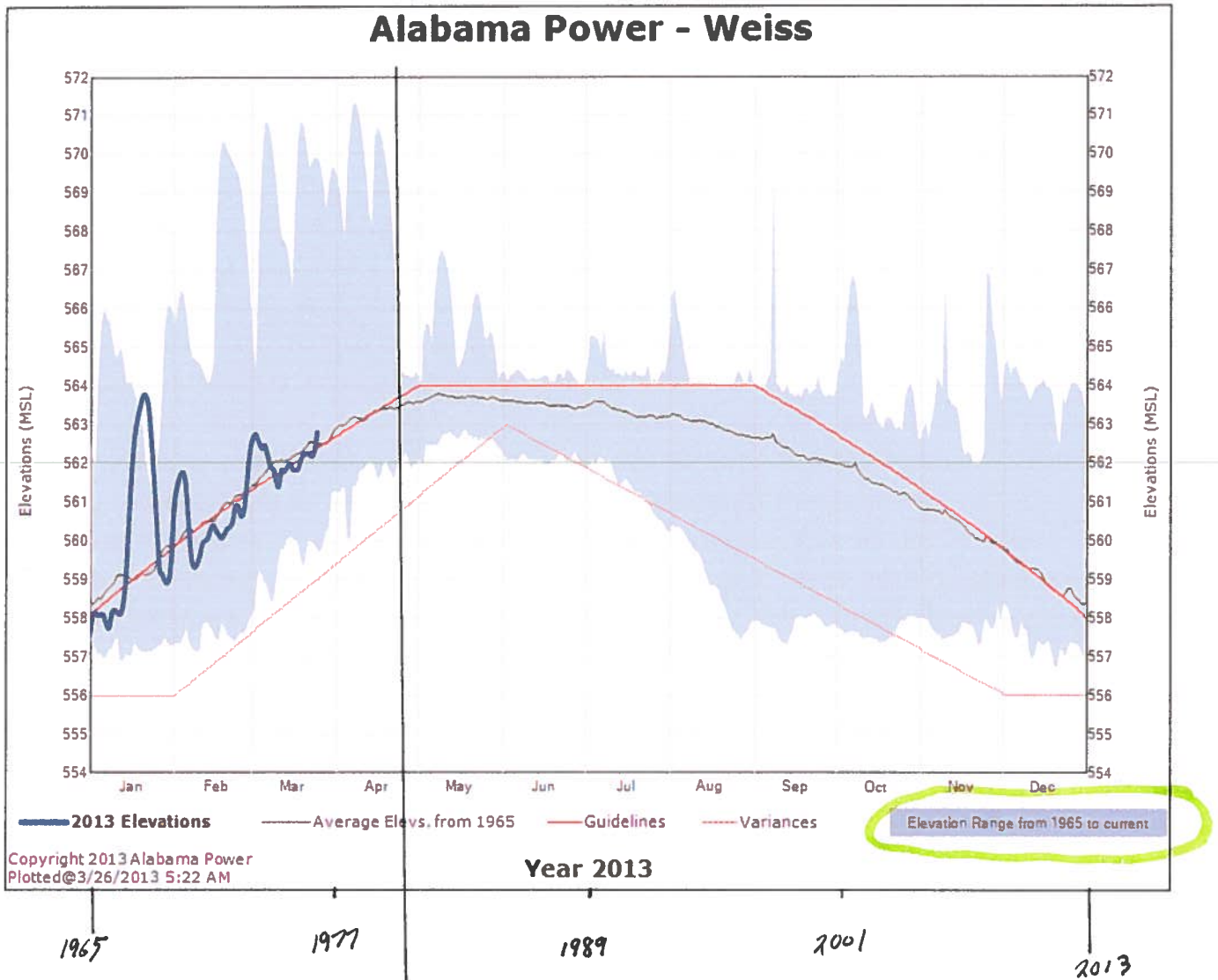
Alabama Power Co. recommended raising the winter pool elev. to 561 in their original permit application. I have not found any negative comments about raising the winter pool elev. in all of the documents supplied by the many agencies and organizations during the permitting process.

Your consideration in this matter is greatly appreciated,

Glenn L. Brown  
113 County Road 932  
Cedar Bluff, Al. 35959

A handwritten signature in black ink, appearing to read 'G. L. Brown', with a long horizontal flourish extending to the right.

Attachments/



Cantors Lake Provider Flood Control

### 2.1.2 Proposed Operation

Through the Alabama Power Cooperative Approach (APCA) process, it was determined that the Weiss development should remain a multi-purpose storage project providing the benefits of hydroelectric generation, storage for power generation, flood control, navigation flow augmentation, maintenance of downstream water quality, municipal and industrial water supply, recreational opportunities, and serving as habitat for fish and wildlife.

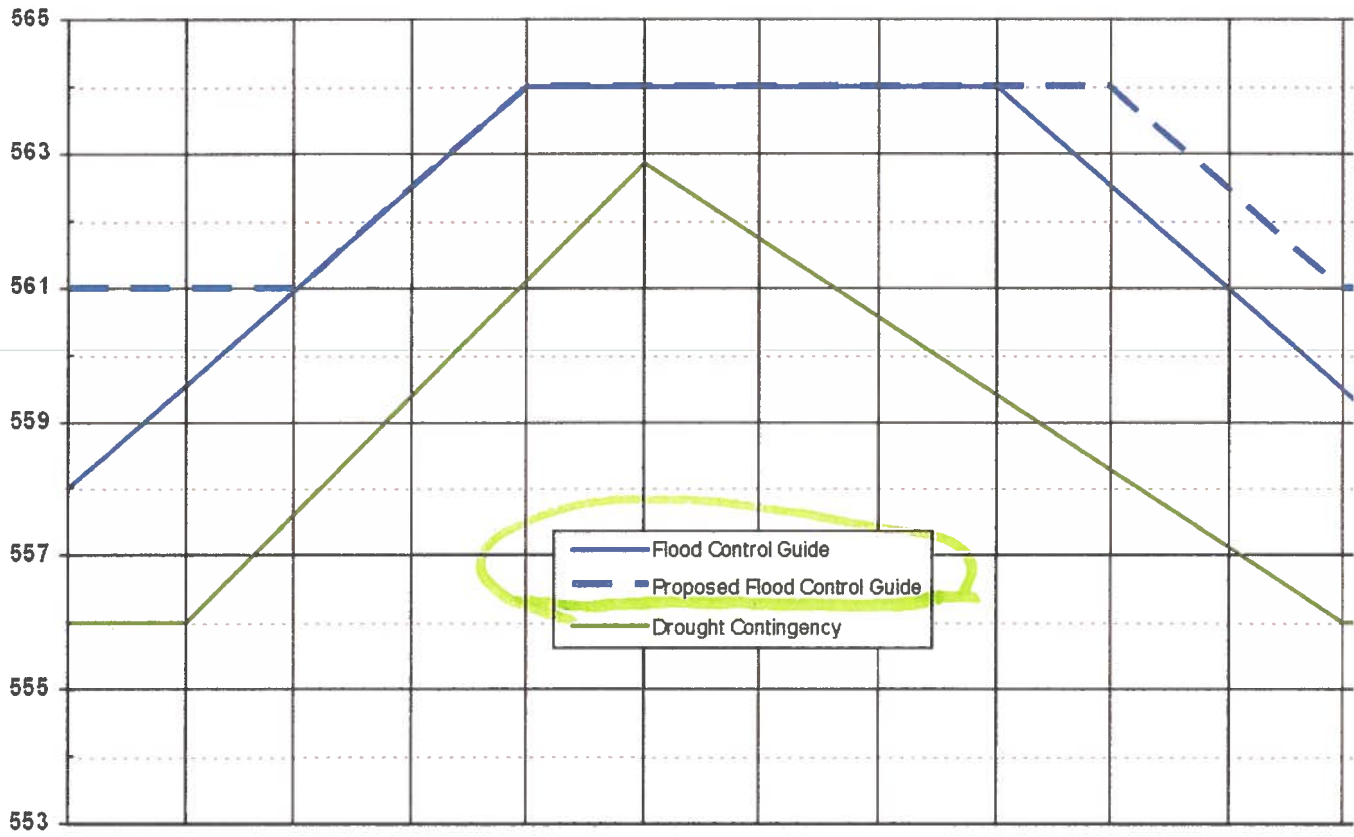
The Weiss development will continue to normally operate to produce peaking power. It will be operated manually by remote control as described in Section 2.1.1. The current flexibility to load and unload the units as electric system conditions dictate will remain unchanged. The units will continue to be operated in the "spinning mode" when not loaded in order to provide generating reserve and reactive capability.

Through the APCA process, it was determined that a change in the Rule Curve would produce a net benefit to the Weiss development. The Proposed Rule Curve is shown in Figure B-2 and the Proposed Flood Control Regulation Schedule is presented in Table B-4. The proposed normal range of power pool drawdown is 3 feet between elevations 564.0 ft msl and 561.0 ft msl, amounting to 82,000 acre-feet. This storage will also be available seasonally for flood control. During periods of low stream flow, releases from storage below 561.0 ft msl will augment the flow of the river downstream. Above the top of the power pool and extending to elevation 572.0 ft msl, there is available for control of floods surcharge storage totaling 302,000 acre-feet, within which reservoir releases will be scheduled as dictated by the Induced Surcharge Curve. This will achieve significant improvement in downstream flow resulting from high to moderate frequency floods.

The Rule Curve delineates the storage in Weiss reservoir allocated to power generation and to flood control throughout the year. This seasonally varying curve is a division between the power and flood control pools and normally the reservoir level will be maintained at or below the curve except when storing floodwaters. The drawdown each year is to elevation 561.0 ft msl. Normally, the plant will operate on a weekly cycle and the power generated will be available for use in daily peak-load periods. At such times as the reservoir level is below the Rule Curve, the power plant will be operated in accordance with electric system requirements.

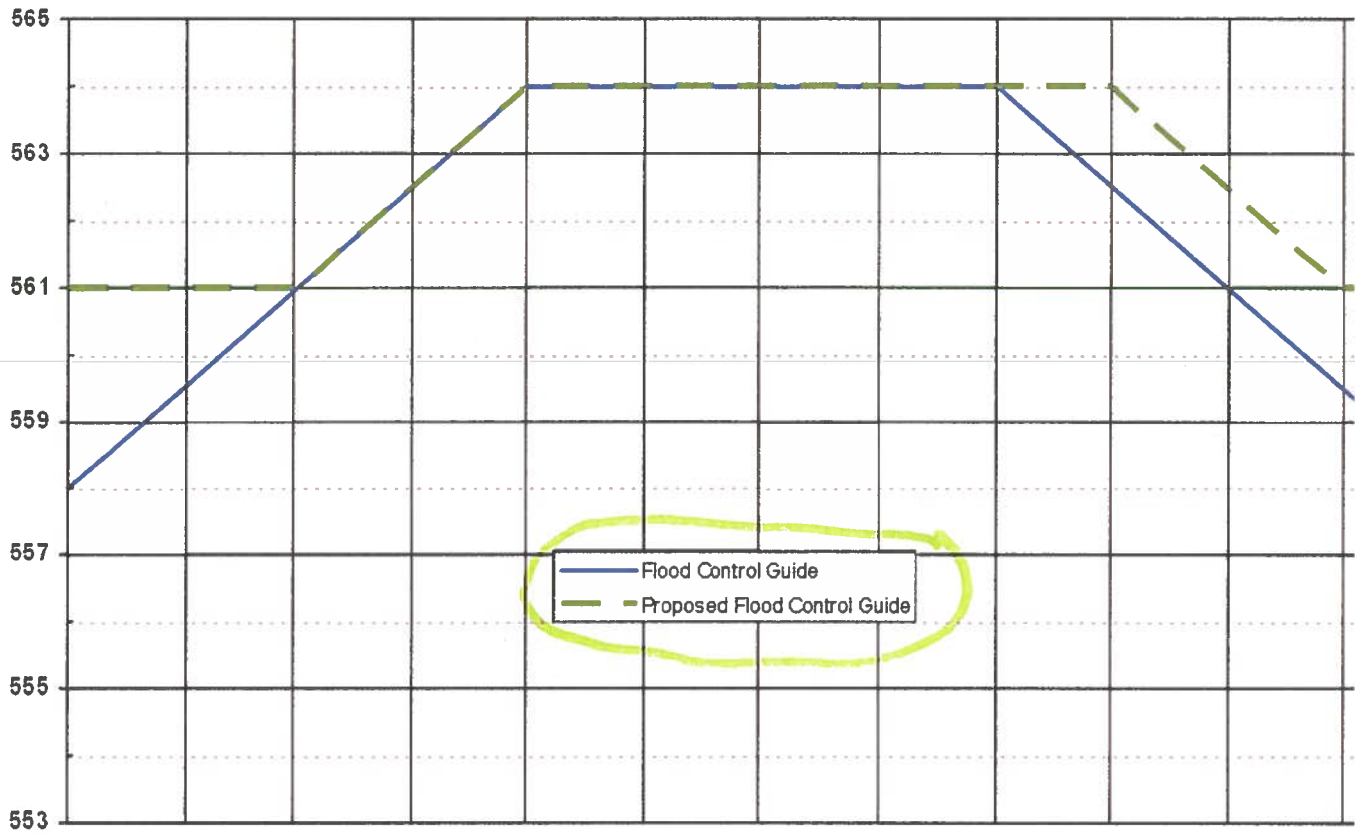


Figure B-2: Weiss Proposed Rule Curve



B-15

**Figure B-1: Weiss Rule Curve**



B-13

## 7.0 PLANS TO MODIFY EXISTING PROJECT FACILITIES

The economic benefit APC customers derive from the Coosa River developments is relative to all other power options available from alternative generating resources. Opportunities to enhance hydro operating efficiencies are economically weighed in light of "competing alternative power options." In recent years, turbine manufacturers have improved turbine design technology so that refurbishing hydro turbines to increase project efficiencies is an economical alternative. For the same flow, incremental increases in capacity and energy are available. These incremental power gains provide increases in renewable energy resources which are environmentally benign relative to alternative thermal resources.

For the long-term, upgrading hydro turbines will continue to be a viable economic alternative. During the short term, however, the timing for undertaking improvements at individual projects will be weighed with other competing capital projects, short-term resource needs, and purchase options that could become available.

APC has utilized the Alabama Power Cooperative Approach (APCA) to involve all stakeholders throughout the relicensing process. Their input, along with routine planned changes APC desires, has resulted in numerous changes to project operations. The changes include:

- **Weiss** - Higher winter pool level, seasonally varying flow in the Bypass reach below spillway, drought management plan
- **Henry** - Higher winter pool level, improved flood control release plan, drought management plan
- **Logan Martin** - Higher winter pool level, improved flood control plan, drought management plan
- **Lay** - Refurbishment of two Units
- **Jordan** - Refurbishment of Unit 4, improved recreational release schedule
- **Bouldin** - Refurbishment of one Unit
- **Weiss, Neely Henry and Logan Martin** – Revised Reservoir Regulation Manuals with the USACE

with FERC), Alabama Power has included an evaluation of this alternative in its APEA as a courtesy to these organizations in recognition of their interests in and recent efforts with respect to the Coosa River Project. Given this very abbreviated time frame, however, APC has analyzed this alternative to the best degree possible.

As fully described in the application, the Alabama Power Enhancement Proposal includes a substantial number of environmental, recreation and operational changes to the Project that will enhance these resources for decades to come. Although not an exhaustive list, these proposed enhancements include: higher winter pool levels at Weiss, Neely Henry and Logan Martin; minimum flow releases in the Weiss Bypass and the Jordan tailrace; a comprehensive shoreline management plan that calls for shoreline protection and enhancement as well as preservation of undeveloped lands; a partnership agreement with state and federal resource agencies for a habitat enhancement program and aquatic culture facility; a wildlife management plan that includes a waterfowl refuge at Weiss and barrier-free hunting areas on Jordan; turbine upgrades at four units; and a recreation plan for each development that includes facility and access improvements in the Coosa Basin. These measures, together with other proposed project enhancements, represent a commitment by APC of over \$350,000,000 over the life of the new license. APC believes strongly that this level of investment in project enhancements fully justifies the issuance by the Commission of a fifty year license for the new Project 2146. This justification is particularly compelling given the consensus resolution of these complex issues among the vast majority of such a diverse group of stakeholders.

Though the filing of this application represents a significant milestone in the Coosa relicensing process, much work remains. Over the next six months, APC will continue to consult with the United States Army Corps of Engineers (USACE) with respect to the proposed changes in the flood control plans related to the winter pool elevation changes at Weiss, Neely Henry and Logan Martin. Based on our consultation over the past eighteen months, we expect the USACE will accept these changes through the issuance of revised regulation manuals once certain impediments faced by the USACE are resolved. In such event, APC will file these manuals as a supplement to the enclosed application. In addition, in the coming months, we will be finalizing an agreement with the Alabama Department of Conservation and Natural Resources and the United States Fish and Wildlife Service consistent with a term sheet, agreed to by Alabama Power and the agencies, that is included in the enclosed application. This agreement, once executed by the parties, will also be filed as a supplement to this application. Lastly, APC will prepare draft license articles that reflect the various measures proposed in the Alabama Power Enhancement Proposal. These draft articles will be provided to the Commission for its

Lake Allatoona Association  
Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**General Guidance**

**Background**

The Water Control Manual (WCM) is the Corps' guideline for the management of Lake Allatoona. The Corps writes the Manual with input from all interested parties (stakeholders). The Manual becomes operationally sacrosanct, is followed closely and/or used as a justification for actions or inaction. The Manual is infrequently updated. A stated reason for the infrequent updates is that proposed changes in Lake management must be scrutinized in an Environmental Impact Study (EIS). The EIS process is costly and that cost is used by the Corps as a principal reason for maintaining the status quo in lake operations.

The Lake Allatoona Association has been excited at the prospect that an update to the WCM is in progress and that the supporting EIS was undertaken and funded. The draft WCM and the draft EIS are now available for review and comment. Of concern is that the proposed operational changes in the management of the lake are minimal and, as a result, the EIS is very narrow in scope.

However, the LAA believes that this is a good opportunity for those who care about the Lake to let the USACE know what they think and to ask pointed questions that the USACE must answer in this legally-required, formal process. Hopefully, we can take advantage of this once-in-twenty-year opportunity to find out why the Corps does things the way that it does.

In no way, shape, or form does the LAA intend to recommend any changes that would increase the risk of flooding to downstream communities. We believe that, using current information and modern technology that the USACE could greatly improve its management of the Lake, primarily through the better management of the water level.

**The USACE's Timeline**

- April 2013 – DEIS Public Comment Period
- Summer 2013 – Publish final EIS
- Summer 2013 Record of Decision signed and Master Manual submitted for approval
- October 2013 – Master Manual approval

## How to Comment

USACE invites all interested parties to submit comments. The public comment period began on March 1<sup>st</sup> and will end after 60 days (we assume that date is April 29<sup>th</sup>). Comments may be submitted via the following methods:

- Onsite at open houses through comment cards or the court reporter. The open houses will be as follows:
  - Georgia
    - Monday, March 25: 5:00 pm–8:00 pm at Cobb Conference Center, 755 Cobb Place Blvd, NW, Kennesaw, GA 30144
    - Tuesday, March 26: 5:00 pm–8:00 pm at The Forum Civic Center, 2 Government Plaza, Rome, GA 301901
  - Alabama
    - Wednesday, March 27: 4:00 pm–7:00 pm at the Senior Activity Center, 623 Broad Street, Gadsden, AL 35901
    - Thursday, March 28: 5:00 pm–8:00 pm at Auburn University-Montgomery, Center for Lifelong Learning, 75 Techna Center Drive, Montgomery, AL 36117
- Digitally by email or on the ACT Master Water Control Manual Update page:  
<http://www.sam.usace.army.mil/Missions/PlanningEnvironmental/ACTMasterWaterControlManualUpdate>
- By letter addressed to: Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-DEIS), P.O. Box 2288, Mobile AL 36628

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Economics & Jobs**

### Outline

The USCOE states that Allatoona generates an estimated 250 million dollars annually from business around the Lake. This is based on their historic draw down because business is negatively impacted by a limited recreational period. Extended recreational periods would substantially enhance upon the economics around to Lake to include more dollars generated for marinas, bait and tackle shops, gas stations, restaurants. All of these improvements taken together would generate what we need - JOBS.

### Comments

- The new Draft Water Control Manual (WCM) states that Water Management Personnel are aware of recreational effects caused by reservoir fluctuations but there the WCM provides no specific requirements to maintain recreational levels. Unfortunately, other project functions usually determine releases and resulting lake levels.
- The USCOE in the Draft WCM expresses Impact Lines which are Lake levels that impact recreational pool levels, with negative impacts defined by the USACOE as follows:
  - Initial Impact Line (837 feet): recreational usage and the economy begin to feel the impact.
  - Recreational Impact Line (835 feet): all swim areas will be exposed. Two Boat Ramps will be closed. Marina business will be severely reduced.
  - Water Access Impact Line (828 feet): most severe effects on recreation. Half of the boat ramps will be closed. There will be hazards to navigation. Marinas will experience increased costs of moving docks and some slips will be unusable.
- The USCOE in the new Draft WCM has changed the Fall drawdown to hold the 835 feet from Sept. 5th thru Nov. 15th. Then from Nov. 15th they would draw down to 823 feet by Dec. 31st. The 823 feet would hold until Jan. 16th with a rise to 840 feet by April 30th.
- The economic benefits for the drawdown for Hydropower and Water Supply are in competition with the economic benefits around the Lake for recreational use. This is a double-edged sword. The USACOE should seek to get a more appropriate (greater) return (i.e. market-based) for the water removed for Hydropower and Water Supply.

### Questions

1. The extended draw down to 835 feet by Nov. 15<sup>th</sup> is an improvement, but the USCOE's proposed Recreational Impact Line will cause all swim areas to be closed and will cause all of the marina business to be severely impacted. Why was the Initial Impact Line of 837 feet or even 840 feet until November 15<sup>th</sup> not recommended?
2. The drawdown in the Draft WCM shows the Lake level from Nov. 15<sup>th</sup> at 835 feet to 823 feet by Dec. 31<sup>st</sup>. What reason is there for the Lake to be at 823 feet on Dec. 31<sup>st</sup>?
3. Since the Dec. 31<sup>st</sup> 823 feet level is only held until Jan. 16<sup>th</sup>, why would keeping the lake at a higher level during that time frame be an issue? This higher level would be beneficial for all of the Lake's legislated purposes and would greatly boost areas economics and JOBS.
4. An earlier recreation period would certainly be economically beneficial for businesses around the lake. Why not have the lake at full conservational pool (840 feet) by April 1<sup>st</sup>?

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Recreation**

### **Outline**

The value of the Lake in terms of recreational resources and quality of life has dramatically increased since the 1940's when the Lake was planned. Plans back then placed complete emphasis on the lake's value as to electric power and flood control – very little to no value was assigned to the use of water for quality of life and recreation uses. The four county area of the lake in the early 1950's was a very rural and poor southern Appalachian community made up of less than 100,000 people. Rural electrification was a paramount need for the area. Today, these same counties contain over 1 million people in a densely populated suburban society. The USACE has not changed its operations of the lake to recognize this dramatic shift of value.

During January and February of 2013, over 50 billion gallons of water have been needlessly drained from the lake (on top of at least that amount previously drained-out in December and January for routine winter drawdown) and dumped into the Gulf of Mexico to the benefit of nothing; this has resulted in absolutely wasted water. This happens most every year. The result of this outdated practice is that the Lake's recreational and quality of life uses are quite often dramatically impacted in the dry late-summer months. It is not uncommon for the majority of the Lake's beaches, ramps, and other recreational access points to be inaccessible to the public beginning in late July or early August. This is a travesty and a waste of our national resource.

This lake annually is one of, if not the most, heavily used USACE lakes in the nation. Annual use in most years approaches and, often, exceeds 7 million people. Small changes across a range of USACE operational practices could result in conservation of the wasted spring season water. This conservation would allow for significant improvement in lake levels and recreational uses in the later summer dry season months. Two feet of water retained in April, carefully managed, would provide for two feet higher water level in August and September.

The fact that the lake's 37,000 acres are exempted by the federal government from local property tax assessments means that about \$ 3 million has been removed from (primarily) Cherokee and Bartow County tax rolls; that amount would exceed the entire county general fund budgets of those two counties. If this amount was collected at prevailing rates, it would result in elimination of all, or almost all, such county property taxes.

The Lake's counties, in addition to shouldering the financial burden of the lake, should be able to benefit from the enormous quality of life and recreation value of the water that passes through it. The USAE must be directed to give appropriate consideration to the modern-day value of water to our local economy and to change its operations accordingly to preserve the water instead of wastefully dumping it away to the ocean.

### **Comments**

- The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water in the lake as is possible to provide for extended recreation uses.
- The USACE should immediately conduct a comprehensive financial analysis that would analyze the comparative costs and benefits of water use for local power generation as compared to use for recreation and improved local quality of life.



- The USACE in its draft EIS to its WCM update states that it does not provide navigation releases from Allatoona. That being the case, the USACE should openly provide a full analysis of its past practices in support of Alabama Power Company's (APC) hydro-power release requests, to demonstrate that APC's associated water release practices do not damage recreational benefits by using Allatoona water to support navigation in Alabama.
- The USACE should modernize its daily routine to effectively be proactive in seeking to conserve Lake water in the face of developing drought conditions and seasonal water use demand/benefits, rather than continue its practice of reactive decision-making that wastes water downstream and, thereby, limits recreational uses.
- The USACE should commission a new feasibility study as to the merits of purchasing flood easements in the Cartersville Etowah River corridor to increase flood risk management through increased discharge capacities, allowing for improved dry season recreational uses and also drought-insurance water conservation.
- The USACE should commission a new feasibility study as to the merits of constructing downstream Etowah reregulation storage capacities to increase flood risk management through increased discharge capacities, allowing for improved dry season recreational uses and drought-insurance water conservation.
- The USACE should commission a new feasibility study as to the merits of constructing, downstream from Carter Dam, Oostanaula reregulation storage facilities. This will allow the USACE to increase its ability to manage flood risk, allowing for improved dry season recreational uses and drought-insurance water conservation.
- The USACE should immediately commission a modernized update of its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities and the actual flood event history of the past 60 years. The study should include a detailed analysis of modern-day flood risk management margins as compared to the original 1950 design criteria.
- The USACE should publically disclose, in a format like its 5-week Lake level forecast curves, April-through-September lake levels compared to its shown "historical average elevation", that could have resulted if zero-benefit water releases to the Gulf had not occurred.

## Questions

1. Please explain why the 5-week lake level forecast is so routinely way out of line with actual results during the reservoir re-filling season? Please describe in detail how the USACE's daily practices actively use various real-time local weather and hydrographic data to develop its operating decisions as to reservoir outflow decisions to conserve water to the benefit of local area recreational benefits.
2. Please explain, in detail, the specific USACE procedures that are used during the dry season months that result in water conservation decisions that benefit local recreational uses at the expense of downstream (APC) power generation support.
3. In light of the modern-day (huge) value of the lake water, please explain why the USACE Zone 2 management policies (based on historically outdated criteria that give insignificant weight to water supply and recreation needs) are woefully inadequate to conserve water for its highest uses for water supply and to prepare for developing drought conditions?
4. Please provide a cost analysis that demonstrates that the subsidies given to hydropower generation through water discharges are more beneficial than the value of local recreation and quality of life uses from 7 million annual users and hundreds of millions of dollars of local economic potential.
5. Please provide an analysis that shows how much of a subsidy is given to electric companies by virtue of the artificially low (as compared to prevailing peak-season electricity market rates) cost of generated power by the releases of water during the dry season months of July, August and September.

6. Please provide a cost analysis that demonstrates that the subsidies given to the occasional Alabama River barge shipment (rather than being diverted to rail shipments) is more beneficial than the beneficial economic, quality of life and recreational value of the water.
7. How much of Alabama Power's typical request of water releases goes to provide for Alabama River navigation support during the dry season months of July, August and September? How about for 2012?
8. If Alabama Power is approved to raise the level of the Lake Martin reservoir, how will the USACE insure and publically disclose that Allatoona water does not indirectly get used to provide for that capacity, since reduced Tallapoosa River flows would at some point have to be offset by Coosa River flows to meet stated USACE navigational, power generation, and environmental flows?
9. What is the cost per ton expenditure annually by all USACE operations to provide for the barge shipments along the Alabama River between Montgomery and Claiborne Lock? How much water volume is provided annually to support such shipments (separate from M&I contracts and low-flow minimums)?
10. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, as compared to that in the 1950's, please explain why flood risk management criteria and policies do not today provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950.
11. Please provide details as to how the USACE uses and integrates NOAA field data and major weather system forecasting information to conserve water, rather than to just release water needlessly downstream because the rule-curve dictates so.
12. In light of modern weather system forecasting capabilities, please explain why excess early spring inflows should not be used conserve valuable water through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging to drought-period water supply requirements and to routine recreation needs.
13. Please explain why the enormous local economic benefit of Lake water from prospective water supply (at least \$500 million annually) and recreation (at least \$250 annually) does not justify reevaluating decades-dated criteria that sends water downstream for much less beneficial purposes. Why does the USACE not exercise its discretion and seek appropriate beneficial use of such a modern-day valuable asset as the water flowing through Allatoona?

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Environmental Impacts**

**Outline**

There are many significant environmental impacts that result from the USACE management of the Lake and, particularly, the management of the water level. Just two are discussed here.

The greatest concern is that the low water levels in the winter, spring, and fall leave many acres of bare soil exposed for months to rain and wind erosion. This is likely the worst case of exposed soil in the State of Georgia and it is managed by an arm of the federal government. Leaving about 400 acres of barren soil left uncontained for 3 to 5 months each year has a huge detrimental effect to the Lake's water quality. For many months, every rain event causes significant erosion of this exposed soil that is carried towards the center of the Lake. The short-term results include vast plumes of sediment in all parts of the Lake.

Another significant negative impact of the USACE's water level management practices is the concentration of pollutants during the winter, spring, and fall seasons. Unfortunately, there is a significant amount of pollutants in the Lake due to poor management of the lands (drainage basin) surrounding the Lake which results in various pollutants entering the Lake (e.g. herbicides, fertilizers, oils, etc.). When the Lake level is dropped for the large majority of the year, these pollutants are concentrated in the smaller amount of water in the Lake.

**Comments**

- The Corps eliminates from consideration any changes in the conservation pool level or winter pool level. These two parameters are the most crucial in terms of potential environmental impact. An open assessment of how the Lake could or should be managed must include an assessment of the merits of the historic full pool level and the historic winter pool level.
- The Corps eliminates from consideration any measures that would change the minimum releases or minimum flows to ensure other entities meet federal clean water compliance requirements. This begs the question as to what extent minimum releases and minimum flows were evaluated.
- The Corps eliminates from consideration any measures that would significantly affect hydropower at Allatoona.

**Questions**

1. In order to manage the Lake in an "optimal" manner, it seems prudent to assess the ramifications of changing the full pool and winter pool levels. They are the most crucial constraints affecting all of the Lake's authorized purposes: recreation, water supply, hydropower, flood control. If these parameters are outside the scope of updating the WCM, how and by whose authority would those parameters be evaluated to ensure they are set at reasonably optimal levels?
2. The only significant change in the year-round water level of the Lake contained in the draft WCM Alternative Plan G (Proposed Action Alternative) is a revision to guide curves and action zones that will result in a phased fall drawdown which would result in a slight increase in water level in the fall and winter. Was a full range of changes to the guide curves considered with an eye to keeping as much water in the Lake as possible without unduly increasing flood control risk? Was the proposed guide curve change offered because it is the least likely to face opposition?
3. There are a number of minimum releases, maximum flow, maximum withdrawal parameters in place that affect the lake's operation and management. Were these max./min. requirements reviewed in Toto (as a group)?

4. Did the Corps conduct a full assessment of the value and cost of the hydropower operation at Lake Allatoona? Does the requirement to have a hydropower function “cost” the lake’s operation more than “benefit” it, in the sense that operational decisions are made simply because of the requirement to produce electricity? With all competing requirements in managing the lake, does the Corps support continued hydropower production?
  5. There is an environmental and economic value in retaining more water in Lake Allatoona. The risks of doing so should be manageable. The Corps formulates draft alternatives to be considered in updating the WCM, thus limiting the scope of any update severely. Quoted from the EIS: “The range of actions, alternatives, and effects considered in this EIS are driven by the requirements set forth by Congress and Corps policies for project operation.” Please help us break down that broad statement. How and by what authority can the public achieve a comprehensive zero-based-budget-type assessment of how the lake should be managed?
-

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Water Supply & Drought Storage**

**Outline**

The value of each gallon of water that passes through the Lake has dramatically increased since the 1940's. The Lake plan then and since has focused almost entirely on flood control and electric power – very little to no value has been assigned to the use of water for local consumption or use. The USACE has not changed its operations of the Lake to recognize this dramatic shift of value.

Nothing we seek would compromise the overriding purpose of flood risk management. We merely wish the USACE to take advantage of modern technologies without increasing the risk of flooding. We ask the USACE to use best-management practices and be proactive to conserve precious water assets. Our proposed changes are minor tweaks to a complex system, but which would have an enormous benefit due to the modern-day high value of water.

During January and February of 2013, over 50 billion gallons of water were needlessly drained from the Lake (on top of at least that amount previously drained-out in December and January for routine winter drawdown) and dumped into the Gulf of Mexico to the benefit of nothing; this was absolutely wasted water. This happens most every year. At current local water utility costs, this waste represents over \$200 million of wasted water this year in just two months! Further, if just 20% of that wasted water had been retained for use moving into the historic drought of 2006, the entire drought restriction impact for Cobb, Cherokee, Paulding and Bartow Counties could have been prevented. If the USACE would adopt our proposal, there would have been no drought impact to water supply (locally) in 2006/2007.

The fact that the lake's 37,000 acres are exempted by the federal government from local property tax assessments means that about \$ 3 million has been removed from (primarily) Cherokee and Bartow County tax rolls; that amount would exceed the entire county general fund budgets of those two counties. If this amount was collected at prevailing rates, it would result in elimination of all, or almost all, such county property taxes.

The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water and follow court mandates to consider the water supply potential of the lake – including raising operational pool levels across all months as is possible and cease the routine dumping of water into the ocean.

**Comments**

- The USACE should conduct a comprehensive financial analysis that would analyze the comparative costs and benefits of water use for local power generation as compared to use for water supply.
- The USACE in its draft EIS to its WCM update states that it does not provide navigation releases from Allatoona. That being the case, the USACE should openly provide a full analysis of its past practices in support of Alabama Power Company's hydro-power release requests, to demonstrate that APC's associated water release practices do not, indirectly, use Allatoona water to support navigation in Alabama.
- The USACE should modernize its procedures to be proactive in seeking conservation of lake water in the face of developing drought conditions and seasonal water use demand/benefits, rather than continue tardy reactive decision-making that wastes water downstream. As an example, the USACE has the ability during normal seasons to lower the Lake over two feet within 24 to 36 hours and the National Weather Service Forecasts now provide the USACE more than a week of advance notice of major rain-making systems.
- The USACE should conduct updated or new feasibility studies regarding strategies to increase Lake-water retention without increasing flood risks - through increased discharge capacities and drought-insurance water conservation. In addition, the USACE should purchase flood easements in the Cartersville Etowah River corridor (instead of decreasing discharge capabilities by 33%) and construct downstream Etowah and Oostanaula river reregulation storage facilities.

- The USACE should modernize its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities and the actual flood event history of the past 60 years, to demonstrate the historically improved flood control margins over the 1950's assumed design criteria.
- The USACE should publically disclose, in the format of its 5-week Lake level forecast, an April-through-September lake levels comparison of its "historical average elevation" compared to the levels that could have resulted if wasteful ocean water dumps had not occurred.

### Questions

1. Please explain why the 5-week lake level forecast so routinely and commonly way out of line with actual results during the reservoir re-filling season? Please describe in detail how the USACE's daily practices use various real-time local weather and hydrographic data to develop its operating decisions as to reservoir outflow decisions so as to conserve water.
2. Please explain, in detail, the specific USACE procedures that are used during the dry-season-months that result in water conservation decisions at the expense of downstream (APC) power generation support.
3. Please explain where, if any, the USACE Zone 2 management policies look forward rather backward, to conserve water for local use, when there are developing drought conditions?
4. Please provide a cost analysis that shows a comparison of hydropower generation water costs and benefits as compared to the market value of locally sold water (about ½ cent per gallon).
5. Please provide a cost analysis of the subsidies given to electric companies through the artificially low (as compared to prevailing peak-season electricity market rates) costs charged them for water releases to generate power during the dry season months of July, August and September.
6. Please provide a cost analysis that compares the subsidies given to the occasional Alabama River barge shipment through Alabama Power water releases that are based on Allatoona water (focused on such shipments' alternate rail shipping costs) to the market value of locally sold water (about ½ cent per gallon).
7. How much of Alabama Power's typical request of water releases goes to provide for Alabama River navigation support during the dry season months of July, August and September?
8. If Alabama Power is approved to raise the level of its Lake Martin reservoir, how will the USACE insure and publically disclose that Allatoona water does not indirectly get used to provide for that capacity, since reduced Tallapoosa River flows would at some point have to be offset by Coosa River flows to meet stated USACE downstream navigational, power generation and environmental flows?
9. What is the annual total USACE cost per ton (water flow, dredging, lock and dam management) to provide for the barge shipments along the Alabama River between Montgomery and Claiborne Lock? How much water volume is provided annually to support such shipments (separate from M&I contracts and low-flow minimums)?
10. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, and the large value of water locally, please explain why flood risk management criteria and policies cannot be tweaked and improved to provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950.
11. Please provide details as to how the USACE uses and integrates NOAA field data and major weather system forecasting information to conserve water, rather than to just release water needlessly downstream simply because the rule-curve dictates so.
12. In light of modern weather system forecasting capabilities, please explain why excess and valuable early spring Lake water inflows should not be conserved through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging to drought-period water supply requirements and to routine recreation needs.

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Clean Water / Water Quality**

**Outline**

The value of each gallon of water that passes through the Lake has dramatically increased since the 1940's when the Lake was planned. Plans back then placed complete emphasis on the Lake's value as to electric power and flood control - no value was assigned to the use of water for local consumption or recreation use. The USACE has not changed its operations of the Lake to recognize this dramatic shift in value.

Beginning in 1972, multiple legislation and regulatory initiatives have been implemented on the federal, state and local levels that require careful attention to improving and protecting the quality of our water resources.

The long-standing procedures by the USACE to dramatically drawdown the Lake and thus expose hundreds of acres of barren shoreline to severe erosion and sediment run-off needs to be reassessed. It is arguable that the USACE practice on the Lake results in the largest exposed/uncontained disturbed site in the State of Georgia. Leaving about 400 acres of barren soil left uncontained for 3 to 5 months each year has a huge detrimental effect to the Lake's water quality.

Repeated late winter and early spring incremental flood filling, followed by rapid drawdowns also result in added siltation and resulting water quality degradation.

USACE policies and practices should be modernized and updated to give consideration to the impact of its outdated pool operations on water quality.

**Comments**

- The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water in the Lake as is possible and to give appropriate weight to the negative water quality impacts of its practices.
- The court system has definitively ruled that water supply should be included as a high priority for the USACE in operating the Lake. The USACE should take all steps necessary to comport its Lake operations with that mandate – including raising operational pool levels across all months to minimize sedimentation degradation of the water-supply uses.
- The USACE should commission a new feasibility study as to the merits of purchasing flood easements in the Cartersville Etowah River corridor to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
- The USACE should commission a new feasibility study as to the merits of constructing downstream Etowah reregulation storage capacities to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should commission a new feasibility study as to the merits of constructing downstream from Carter Dam, Oostanaula reregulation storage capacities, to increase flood risk management and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should immediately commission a modernized update of its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities

and the actual flood event history of the past 60 years. The study should include a detailed analysis of modern-day flood risk management margins as compared to the original 1950 design criteria which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures

- The USACE should publically disclose (in a format similar to its 5-week Lake level forecast curves), April-through-September Lake levels, that could have resulted if zero-benefit water releases to the Gulf had not occurred. These levels should be compared to the shown “historical average elevation”.

### Questions

1. Please explain why the USACE believes it is exempt from soil erosion and sedimentation laws and regulations that all other elements of society must follow
2. Explain what engineering considerations are given to the impact of soil erosion occurring during periods of low lake levels and the resulting exposed bare soils on the shores of Lake Allatoona
3. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, as compared to that in the 1950’s, please explain why flood risk management criteria and policies do not today provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950 which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
4. In light of modern weather system forecasting capabilities, please explain why excess early spring inflows should not be used conserve valuable water through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging drought –period water supply requirements and to routine recreation needs which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
5. Please explain why the enormous local economic benefit of Lake water from prospective water supply (at least \$500 million annually) and recreation (at least \$250,000,000 annually) does not justify reevaluating decades-dated criteria that sends water downstream for much less beneficial purposes. Why does the USACE not exercise its discretion and propose specific intent to seek appropriate beneficial use of such a modern-day valuable asset as water flowing through Allatoona which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures?
6. Please provide details on alternatives that the USACE has considered for seasonal surface treatment/protection use to minimize exposed shoreline erosion and sedimentation through modern environmental practices.



Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Fishing**

**Outline**

Lake Allatoona is heavily used for fishing from boats and from the shoreline. Several tournaments are held on the Lake every year. Fishing contributes significantly to the local economy.

**Comments**

- When the Lake water level is dropped, it causes a hardship for those fishing from boats
- We have to beach our \$50,000-plus boats on the rocky shores because there are no docks floating in the wintertime.
- There is a lot of revenue that is lost to the areas around Lake Allatoona due to the low lake levels over the winter months.
- The constantly varying lake levels in the spring have an adverse effect on the fish spawn. The USACE should work harder to have the levels rise steadily in the spring.
- Overall, the fishermen are more concerned with winter water levels than summer water levels

**Questions**

- Does the lake really need to be dropped to 817 below full pool in the winter?
- Would it be possible to try and stop at 821 feet below full pool?
- Is it possible to extend a couple of the docks further out so they would float even when the lake is at 817 feet below full pool?

Typed version of comment 2013-0029 (copy of original handwritten comment letter follows on the next pages).

I came here tonight expecting to hear that the winter level of Lake Weiss will be increased from 6' to 3'. What I learned is that the Corps of Engineers is not prepared to make this change because Weiss is considered a flood control lake.

The 6' winter level of Lake Weiss is causing significant economic problems for Cherokee County. When the water is 6' low fisherman don't come to Weiss. Many of our restaurants motels, and other businesses cannot keep their doors open because fisherman don't come in the winter.

During the summer our lake suffers from low water flow because much of the water is sent to the metro Atlanta area. This low water flow results in poor water for Lake Weiss.

Atlanta is no more important than the residents in the Coosa River Basin!



MOBILE DISTRICT



US Army Corps of Engineers

**Submit Comments and Stay Informed**

Thank you for submitting your comments on the U.S. Army Corps of Engineers Alabama-Coosa-Tallapoosa (ACT) River Basin Master Water Control Manual (WCM) Draft Environmental Impact Statement (EIS).

If you are not currently receiving information regarding the ACT EIS and would like to, please complete the mailing information below.

Submit this comment form at the public meeting or by U.S. mail to:

Tetra Tech, Inc.  
 61 St. Joseph Street, Suite 550  
 Mobile, AL 36602-3521

If you would like more information on the ACT River Basin or the EIS process please check the main ACT Master Water Control Manual Update page:  
<http://www.sam.usace.army.mil/Missions/PlanningEnvironmental/ACTMasterWaterControlManualUpdate>.

First name	Robert Taylor
Last name	Taylor
Organization name	Lake Weiss resident
To be added to the mailing list, complete the following information.	
Address	1835 G. Rd. 131
City	Cedar Bluff,
County	Cherokee
State	Alabama
ZIP Code	35959
E-mail	btaylor001@tds.net
Add to mailing list	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Preferred delivery method*	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-mail

\*Future updates will be provided by e-mail unless otherwise indicated.

<p>Comments</p>	<p>I came here tonight expecting to hear that the winter level of Lake Weiss will be increased from 6' to 3'. What I learned is that the Corp of Engineers is not prepared to make this change because Weiss is considered a flood control lake.</p> <p>The 6' winter level of Lake Weiss is causing significant economic problems for Cherokee County. When the water is 6' low fishermen don't come to Weiss. Many of our restaurants, motels, and other businesses cannot keep their doors open because fishermen don't come in the winter.</p>
<p>Resource Area to Which My Comment Is Related</p> <p>(Choose all that apply)</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Biological Resources</li> <li><input checked="" type="checkbox"/> Cultural Resources</li> <li><input type="checkbox"/> Data, Studies, &amp; Analytical Tools</li> <li><input checked="" type="checkbox"/> Drought Operations</li> <li><input checked="" type="checkbox"/> Flood Risk Management</li> <li><input checked="" type="checkbox"/> Hydropower</li> <li><input type="checkbox"/> National Environmental Policy Act</li> <li><input checked="" type="checkbox"/> Navigation</li> <li><input checked="" type="checkbox"/> Socioeconomics &amp; Recreation</li> <li><input checked="" type="checkbox"/> Water Management Recommendations</li> <li><input checked="" type="checkbox"/> Water Quality</li> <li><input checked="" type="checkbox"/> Water Supply</li> <li><input type="checkbox"/> Other:</li> </ul> <p>During the summer our lake suffers from low water flow because much of the water is sent to the metro Atlanta Area. This low water flow results in poor water for Lake Weiss.</p> <p>Atlanta is no more important than the residents in the Coosa River Basin!</p>

Commander , USACE, Mobile District  
P O Box 2288  
Mobile , AL. 36628

Attn : PD-EI(ACT-DEIS )  
Comments on WCM Revisions  
Lake Allatoona in ACT Basin

I have the following thoughts and comments concerning my review of the WCM rough draft for Lake Allatoona and ACT Basin .

My major concern that needs attention ,is the deviation between the Top of Conversation Pool Line and Historical Average Line starting on July 1 through November .This trend is getting worse every year .Everyone( Ga. EPD,Alabama Power ,navigation ,etc.) wants the water out of the Lake in late summer and fall when rainfall averages and inflow are low .

There is very little change in this revision considering how drastically the Lake has changed and how the full pool duration has shortened .The Lake has gone from a rural one for flood control to an urban one with 1,000,000 people and a large value on every gallon of water in it due to the following .

Land value ,taxes &visitation are very high .Probably your most visited lake for its size .As the lake gets smaller in summer it gets dangerous due to reduced area and is a huge economic and recreational loss .

The WCM revision correctly shows at 835 elevation or 5' low ,the Lake starts to become useless for recreation ( an economic impact in the millions) Half the lakeside restaurants have closed & Red Top Mountain State Park Lodge has closed .

Flood control is the lake's main function and priority and rightly so .The winter drawdown is required .Now for the possible remedies to keep the lake level higher in late summer and fall. The answer is to properly prioritize all discharge functions by value to a fast growing urban area and give more attention to water control during this period.

The lake's #2 present priority seems to be hydroelectric power and it should not be in the future due to urbanization and so little power being produced here.The dam produces 0.063 % of the States ' power or 1/8 the power of Carters dam .The lost water cost greatly exceeds the benefit.

Even the Courts have said municipal water supply is a priority .This should be accounted for in the WCM along with future projections.It can account for 2 feet of pool elevation in the critical period per Governor Nathan Deal's letter dated 1/24/13 asking to triple the amount of water

withdrawn. Through interbasin transfer of 15 Georgia counties, this water could be used outside the ACT basin. The Lake's worst threat .

Water should never be released for navigation if Lake is not full . Very little navigation exist today in ACT basin and is of negligible value.

Due to the increasing worth of a gallon of Lake Allatoona water ,all priorities on it should be addressed by the numbers by the WCM revision. The trend of the lake level to be lower earlier every summer needs to stabilize and it was not lower for decades in the past .This makes the Historical Average Line much worse than shown for the last decade.

Hopefully by dropping the Top of Conservation lake level to 835 on September 15, as considered , will not cause a future decline in the Historical Average . Hopefully the deviation in the two will decrease without dropping the Top of Conservation line down to closer match actual pool elevation.

Time will tell and the future of this undervalued treasure is at stake.

Yours truly,



Glen Long P.E.

480 Mossy Vale Way

Atlanta ,Ga. 30328

[glenlong@comcast.net](mailto:glenlong@comcast.net)

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Melba Rogers

**Affiliation:** Lake Weiss Homeowner

### Contact Information

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**Address:**

3371 co rd 104  
cedar bluff, AL 35959

**County:** usa

**Phone:** 256-779-8194

**Email:** trillium@tds.net

### Comment Metadata

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**Comment Number:** 2013-0031

**Date:** 3/28/2013 4:47:35 PM

**Interest:**

**Resource Area:** other Poor Mgt on Lake Weiss

**Attachments:**

### Comments:

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Alabama is light years behind the rest of the country!!!! I was born and raised in Al. but this heritage fact has not blinded me to our backwardness. Since moving back to Al, I have been so disappointed with the politics and local government and the management of Lake Weiss. The level is w-a-a-y too low esp. in winter months to even take a boat on the water. It is a shallow lake to begin with and has so many trees, stumps and other obstacles. Boats are easily damaged and lives are threatned. Rumor is out that our lake is "poisoned". Perhaps the PCB's would not be disturbed as much if the lake levels did not flucuate so much. We don't have much to offer from ou lake anymore....Cherokee county and the residents are definately suffering from support of Corps of Engineers.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Guy Andrews

**Affiliation:**

### Contact Information

---

**Address:**

515 County Road 728

Cedar Bluff, AL 35959

**County:** Cherokee

**Phone:**

**Email:** Guysmail1259@gmail.com

### Comment Metadata

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**Comment Number:** 2013-0032

**Date:** 4/1/2013 9:29:34 AM

**Interest:**

**Resource Area:** other Water Levels at Weiss

**Attachments:**

### Comments:

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I support Alabama Power Corporation proposed project at Weiss Lake to raise the winter guide curve by 3 ft from elevation 558 ft to 561 ft from December 1 through March 1 with a constant rise in the Weiss Lake reservoir until the normal summer elevation of 564 ft is reached on May 1 and the summer guide curve extended from August 31 to September 30 with the same summer elevation as operated.

This is a very shallow lake and dangerous during the current winter guide curve.



## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Vince Persano

**Affiliation:** Lake Allatoona Assoc.

### Contact Information

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**Address:**

PO Box 296

Cartersville, GA 30120

**County:** Bartow

**Phone:** 770-974-9809

**Email:** vpersano@comcast.net

### Comment Metadata

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**Comment Number:** 2013-0033

**Date:** 4/10/2013 10:57:13 AM

**Interest:**

**Resource Area:** Data, Studies, & Analytical Tools

**Attachments:**

### Comments:

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Disappointed in the fact that after over 60 years of historic data and enhanced weather detection technology that a broader based study to include flood water reallocation was not conducted which may have allowed a change in the summer and winter pools at Lake Allatoona. This outcome could have been very advantageous to todays demands on the lake by modifying levels to fill those needs which would also help to assure water quality and overall preservation of tne lake.

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USACE  
MOBILE DISTRICT PUBLIC MEETINGS  
FOR THE ACT RIVER BASIN  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
Cobb Conference Center  
755 Cobb Place Boulevard, NW  
Kennesaw, Georgia 30144  
March 25, 2013

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MS. ROBERTSON: Tia, T-I-A, Robertson,  
R-O-B-E-R-T-S-O-N.

I would like to see Allatoona managed with  
water conservation as a higher priority and  
recreational use a higher priority. It has a  
big economic impact as well as quality of life  
impact on this area.

And I'll send an email. Thank you very  
much. I enjoyed the interaction. It was very  
helpful. It answered quite a few questions.

And I intend to contact my congressman to  
hopefully -- that's my understanding is that it  
takes congress to change the mission, I guess,  
of the corps, and that's my plan to get that to  
happen.

Thank you.

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USACE  
MOBILE DISTRICT PUBLIC MEETINGS  
FOR THE ACT RIVER BASIN  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
Cobb Conference Center  
755 Cobb Place Boulevard, NW  
Kennesaw, Georgia 30144  
March 25, 2013

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22 MR. CULPEPPER: Jerry Culpepper,  
23 C-U-L-P-E-P-P-E-R.

1 I'm concerned about the sediment raining  
2 down into the lake when the lake levels are  
3 low. When the rain comes, it hits the dirt and  
4 pushes it all into the lake, and I understand  
5 we've lost four to five feet over the 40 or  
6 50 years. And I want to see, basically, what  
7 kind of study they've done about how we can keep  
8 some of that land from sliding down into the  
9 lake and, therefore, raising the bottom four or  
10 five feet. It seems like every time it rains,  
11 it just is muddy and the quality of water is  
12 just terrible. And that's one of my biggest  
13 concerns about the runoff during the winter when  
14 the lake is so low.

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USACE  
MOBILE DISTRICT PUBLIC MEETINGS  
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Kennesaw, Georgia 30144  
March 25, 2013

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18 MS. KAY: Rhonda Kay, R-H-O-N-D-A K-A-Y.  
19 I have two concerns. My first concern is  
20 that if they're going to release more water from  
21 the lake, then the lake level needs to be --  
22 come up because I'm on the south end of the  
23 lake, and because I live on the south end of the  
1 lake, I lose water first. So if they're taking  
2 out more water, then my property values are  
3 going to go down because I'm going to be on a  
4 mud flat. So that's one issue that is quite  
5 important as far as that goes. Then if they're  
6 going to let more out, that means they need to  
7 bring it up so that I have, you know, water on  
8 my end so my property values are not devalued  
9 because I won't have any water.  
10 And then as far as the water quality, it  
11 doesn't help the lake with silt and runoff and  
12 chemicals and everything else that we have  
13 already going into the lake when for the last 63  
14 years we have left that end of the lake when  
15 they drain it from, let's say, September or  
16 October until January before it starts filling  
17 up, total dirt. To me, that's very toxic, and  
18 it does not help the water quality or help with  
19 any of the issues that we have with that and  
20 that needs to be addressed.  
21 So if they brought it up and kept it where  
22 there was at least something to cover the dirt,  
23 then I feel like, you know, maybe that would  
1 improve. But, you know, I know that there are  
2 other things they have to take into  
3 consideration when it comes to that, but those  
4 are my -- my biggest issues are what my -- my  
5 biggest concerns are is how this is going to  
6 impact me. Saying it's not going to have any  
7 impact isn't correct. That will have an  
8 impact.  
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755 Cobb Place Boulevard, NW  
Kennesaw, Georgia 30144  
March 25, 2013

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12 MR. HORNEY: John Horney, H-O-R-N-E-Y,  
13 purehp@bellsouth.net.  
14 I live on the lake, BCCI community. I  
15 would like to know what is needed to be done to  
16 get a study, whether it be a hydrology study, to  
17 see what the real number is rather than drawing  
18 the lake down 17 feet, if there's another number  
19 that makes better sense given the technology  
20 that we have nowadays; weather forecasting, the  
21 usage of the water in the lake with the amount  
22 of people in the greater Atlanta metro area now  
23 versus what it was back when the lake was put in  
1 in the '50s. Also to see if the lake could be  
2 maybe raised a month sooner. Instead of May  
3 coming full pool maybe April or, you know,  
4 mid-March. It would benefit both recreation and  
5 the people that actually need the water in the  
6 area rather than send it all downstream if it's  
7 not needed. If the study can be done --  
8 hydrology study -- to reduce the amount of water  
9 drawn down each year.

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March 25, 2013

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13 MR. ROBERTS: Robby Robert.  
14 First off, I'd like to say they do a great  
15 job on the lake all in all. But the biggest  
16 change I'd like to see is a little more  
17 consideration toward recreational on the lake by  
18 increasing the lake levels. I don't think the  
19 lake should be lower than 840 through Labor  
20 Day. It lowers the lake so much. When they  
21 lower it to 835, that five-foot difference has  
22 people, you know, looking at a whole lot less  
23 area. Five feet leaves a lot less lake, and  
1 there's all kind of rock issues out there Labor  
2 Day when they get down to 835 or below. And  
3 it's been a little below that for the last few  
4 years. And then I think they ought to start off  
5 a little higher than 840 at the start of the  
6 summer season. They need to get up to maybe 842  
7 so that during the evaporation of, you know,  
8 July and August the lake doesn't come down as  
9 much where they can maintain it until Labor Day  
10 of 840. And I know that's their target, but  
11 unless they raise the going-in level, they're  
12 not going to ever hit it. And I talked to them  
13 about it, and they said, well, in our study that  
14 wasn't one of the parameters was going past 840  
15 but I make a good point. The lake's going to  
16 evaporate a couple of feet in the hot summer  
17 when our rain is at its low level. So I think  
18 it would be a much safer place to be on the  
19 lake -- and I live there -- Labor Day weekend  
20 and the end of summer if they keep the lake  
21 level up to 840.  
22 That's it. Like I said, they do a good  
23 job.



April 23, 2013

Commander, U.S. Army Corps of Engineers, Mobile District  
Attn: PD-EI (ACT-DEIS)  
P.O. Box 2288, Mobile, AL 36628

RE: Comments regarding update of ACT Water Control Manual

Dear Sir or Madam:

Thank you for the opportunity to submit comments regarding the Corps of Engineers' ("Corps") revision of the Water Control Manual ("WCM") for the Alabama-Coosa-Tallapoosa Flint River ("ACT") system. The Lake Allatoona Association is the community-based non-profit organization of like-minded lake resource users whose sole purpose is to seek improved lake water quality and levels through activity as "The Voice of Lake Allatoona". Our below and attached comments are constructively offered to that end.

The CORPS has a serious responsibility with the overriding flood risk management task of Allatoona Lake. Nothing that we believe or seek is offered to compromise that task. However given the now enormous value that our Lake water has to literally over a million people for water supply and recreational quality of life, we believe that changes are in order, from the way things have been done with single focus on flood control since 1950, to the detriment of water supply and recreational quality-of-life purposes.

In 1950, the CORPS' best weather forecasting tools were nothing like what it now has routine access to through NOAA and other sources; seasonal forecast capabilities of lake inflows give exponentially improved abilities to manage lake outflows. In 1950 the CORPS hydrologic models were weak shadows of what it uses today from hundreds of real time stream flow gauges and sophisticated HEC RAS runoff models. In 1950, rural Bartow, Cherokee, Cobb and Paulding Counties' populations totaled less than 100,000 people and the water was so invaluable then that its use was most often not even metered. Today the Lake is directly surrounded by over 1 million people who are paying about \$5 dollars for every 1000 gallons of water.

In light of these enormous changes, LAA has thoughtfully sponsored a comprehensive set of recommendations for positive change to Allatoona's water levels, with connected improved levels of lake water quality. LAA calls this program "2-4-6-8, Allatoona Clean"; in summary that label refers to the nominal outcomes that LAA seeks – namely: A 2-foot increase in summer pool levels, such summer pool level beginning 4-weeks earlier than

it presently does, such summer pool level held higher for 6-weeks longer than it is presently, and an 8-foot reduction in the winter season drawdown. The 2-4-6-8, Allatoona Clean proposal is not offered as the only solution and its particular numbers are not sacred. Rather, it was offered in the past and is again offered to prompt discussion and debate around the central proposition that the Lake's water levels could be managed differently to the benefit of certain of the Lake's "purposes" and without detrimental effect on the chiefly emphasized "purpose" of flood control. That 3-page document was provided to the CORPS in 2010, and is attached for your ease of reference.

Within the above outlined context, LAA had hoped to find that the WCM update would have addressed such a critical issue as the need to improve operations relating to Allatoona Lake's very important water supply and recreation quality-of-life characteristics. Instead, we are very disappointed to see that the revision's scope had been severely restricted such that no consideration has been given (except for projections of minor reductions in late recreation season power generation releases) in the update to implement Allatoona Lake water conservation measures that could prove of great value toward serving water supply and recreation needs.

The public deserves a zero-based, bottoms-up review of how the Lake is managed, to include consideration of retaining more water in the lake year-round. While the laws and regulations may require that the Corps offer an opportunity for public comment, it is disingenuous to do so when, in fact, the parameters of the review are so constrained as to be make the process a token effort and the solicitation of public comment a form of patronization within a process that results in no meaningful improvements, modernization or recognition of 21<sup>st</sup> century realities and needs as relates to Allatoona Lake.

Therefore, to provide the CORPS comments on the Draft EIS on the WCM, LAA attaches six compilations of about 40 specific questions or requests provided by our membership on each Key Issue of: Economics, Recreation, Fishing, Water Supply and Drought Storage, Water Quality, Environment.

In summary, LAA believes that the CORPS could pay attention to a range of detail different from how it established over 60 years ago to not only manage flood risks but also to conserve and not wastefully dump water to the ocean, thus using the full potential of the Lake's water to benefit local water supply and recreational purposes across all four seasons without increasing flood risks that were foreseen in 1950.

Sincerely,

Lake Allatoona Association  
Board of Directors

attachments

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Clean Water / Water Quality**

**Outline**

The value of each gallon of water that passes through the Lake has dramatically increased since the 1940's when the Lake was planned. Plans back then placed complete emphasis on the Lake's value as to electric power and flood control - no value was assigned to the use of water for local consumption or recreation use. The USACE has not changed its operations of the Lake to recognize this dramatic shift in value.

Beginning in 1972, multiple legislation and regulatory initiatives have been implemented on the federal, state and local levels that require careful attention to improving and protecting the quality of our water resources.

The long-standing procedures by the USACE to dramatically drawdown the Lake and thus expose hundreds of acres of barren shoreline to severe erosion and sediment run-off needs to be reassessed. It is arguable that the USACE practice on the Lake results in the largest exposed/uncontained disturbed site in the State of Georgia. Leaving about 400 acres of barren soil left uncontained for 3 to 5 months each year has a huge detrimental effect to the Lake's water quality.

Repeated late winter and early spring incremental flood filling, followed by rapid drawdowns also result in added siltation and resulting water quality degradation.

USACE policies and practices should be modernized and updated to give consideration to the impact of its outdated pool operations on water quality.

**Comments**

- The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water in the Lake as is possible and to give appropriate weight to the negative water quality impacts of its practices.
- The court system has definitively ruled that water supply should be included as a high priority for the USACE in operating the Lake. The USACE should take all steps necessary to comport its Lake operations with that mandate – including raising operational pool levels across all months to minimize sedimentation degradation of the water-supply uses.
- The USACE should commission a new feasibility study as to the merits of purchasing flood easements in the Cartersville Etowah River corridor to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
- The USACE should commission a new feasibility study as to the merits of constructing downstream Etowah reregulation storage capacities to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should commission a new feasibility study as to the merits of constructing downstream from Carter Dam, Oostanaula reregulation storage capacities, to increase flood risk management and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should immediately commission a modernized update of its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities

and the actual flood event history of the past 60 years. The study should include a detailed analysis of modern-day flood risk management margins as compared to the original 1950 design criteria which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures

- The USACE should publically disclose (in a format similar to its 5-week Lake level forecast curves), April-through-September Lake levels, that could have resulted if zero-benefit water releases to the Gulf had not occurred. These levels should be compared to the shown “historical average elevation”.

### Questions

1. Please explain why the USACE believes it is exempt from soil erosion and sedimentation laws and regulations that all other elements of society must follow
2. Explain what engineering considerations are given to the impact of soil erosion occurring during periods of low lake levels and the resulting exposed bare soils on the shores of Lake Allatoona
3. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, as compared to that in the 1950's, please explain why flood risk management criteria and policies do not today provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950 which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
4. In light of modern weather system forecasting capabilities, please explain why excess early spring inflows should not be used conserve valuable water through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging drought –period water supply requirements and to routine recreation needs which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
5. Please explain why the enormous local economic benefit of Lake water from prospective water supply (at least \$500 million annually) and recreation (at least \$250,000,000 annually) does not justify reevaluating decades-dated criteria that sends water downstream for much less beneficial purposes. Why does the USACE not exercise its discretion and propose specific intent to seek appropriate beneficial use of such a modern-day valuable asset as water flowing through Allatoona which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures?
6. Please provide details on alternatives that the USACE has considered for seasonal surface treatment/protection use to minimize exposed shoreline erosion and sedimentation through modern environmental practices.

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Economics & Jobs**

### Outline

The USCOE states that Allatoona generates an estimated 250 million dollars annually from business around the Lake. This is based on their historic draw down because business is negatively impacted by a limited recreational period. Extended recreational periods would substantially enhance upon the economics around to Lake to include more dollars generated for marinas, bait and tackle shops, gas stations, restaurants. All of these improvements taken together would generate what we need - JOBS.

### Comments

- The new Draft Water Control Manual (WCM) states that Water Management Personnel are aware of recreational effects caused by reservoir fluctuations but there the WCM provides no specific requirements to maintain recreational levels. Unfortunately, other project functions usually determine releases and resulting lake levels.
- The USCOE in the Draft WCM expresses Impact Lines which are Lake levels that impact recreational pool levels, with negative impacts defined by the USACOE as follows:
  - Initial Impact Line (837 feet): recreational usage and the economy begin to feel the impact.
  - Recreational Impact Line (835 feet): all swim areas will be exposed. Two Boat Ramps will be closed. Marina business will be severely reduced.
  - Water Access Impact Line (828 feet): most severe effects on recreation. Half of the boat ramps will be closed. There will be hazards to navigation. Marinas will experience increased costs of moving docks and some slips will be unusable.
- The USCOE in the new Draft WCM has changed the Fall drawdown to hold the 835 feet from Sept. 5th thru Nov. 15th. Then from Nov. 15th they would draw down to 823 feet by Dec. 31st. The 823 feet would hold until Jan. 16th with a rise to 840 feet by April 30th.
- The economic benefits for the drawdown for Hydropower and Water Supply are in competition with the economic benefits around the Lake for recreational use. This is a double-edged sword. The USACOE should seek to get a more appropriate (greater) return (i.e. market-based) for the water removed for Hydropower and Water Supply.

### Questions

1. The extended draw down to 835 feet by Nov. 15<sup>th</sup> is an improvement, but the USCOE's proposed Recreational Impact Line will cause all swim areas to be closed and will cause all of the marina business to be severely impacted. Why was the Initial Impact Line of 837 feet or even 840 feet until November 15<sup>th</sup> not recommended?
2. The drawdown in the Draft WCM shows the Lake level from Nov. 15<sup>th</sup> at 835 feet to 823 feet by Dec. 31<sup>st</sup>. What reason is there for the Lake to be at 823 feet on Dec. 31<sup>st</sup>?
3. Since the Dec. 31<sup>st</sup> 823 feet level is only held until Jan. 16<sup>th</sup>, why would keeping the lake at a higher level during that time frame be an issue? This higher level would be beneficial for all of the Lake's legislated purposes and would greatly boost areas economics and JOBS.
4. An earlier recreation period would certainly be economically beneficial for businesses around the lake. Why not have the lake at full conservational pool (840 feet) by April 1<sup>st</sup>?



Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Environmental Impacts**

### **Outline**

There are many significant environmental impacts that result from the USACE management of the Lake and, particularly, the management of the water level. Just two are discussed here.

The greatest concern is that the low water levels in the winter, spring, and fall leave many acres of bare soil exposed for months to rain and wind erosion. This is likely the worst case of exposed soil in the State of Georgia and it is managed by an arm of the federal government. Leaving about 400 acres of barren soil left uncontained for 3 to 5 months each year has a huge detrimental effect to the Lake's water quality. For many months, every rain event causes significant erosion of this exposed soil that is carried towards the center of the Lake. The short-term results include vast plumes of sediment in all parts of the Lake.

Another significant negative impact of the USACE's water level management practices is the concentration of pollutants during the winter, spring, and fall seasons. Unfortunately, there is a significant amount of pollutants in the Lake due to poor management of the lands (drainage basin) surrounding the Lake which results in various pollutants entering the Lake (e.g. herbicides, fertilizers, oils, etc.). When the Lake level is dropped for the large majority of the year, these pollutants are concentrated in the smaller amount of water in the Lake.

### **Comments**

- The Corps eliminates from consideration any changes in the conservation pool level or winter pool level. These two parameters are the most crucial in terms of potential environmental impact. An open assessment of how the Lake could or should be managed must include an assessment of the merits of the historic full pool level and the historic winter pool level.
- The Corps eliminates from consideration any measures that would change the minimum releases or minimum flows to ensure other entities meet federal clean water compliance requirements. This begs the question as to what extent minimum releases and minimum flows were evaluated.
- The Corps eliminates from consideration any measures that would significantly affect hydropower at Allatoona.

### **Questions**

1. In order to manage the Lake in an "optimal" manner, it seems prudent to assess the ramifications of changing the full pool and winter pool levels. They are the most crucial constraints affecting all of the Lake's authorized purposes: recreation, water supply, hydropower, flood control. If these parameters are outside the scope of updating the WCM, how and by whose authority would those parameters be evaluated to ensure they are set at reasonably optimal levels?
2. The only significant change in the year-round water level of the Lake contained in the draft WCM Alternative Plan G (Proposed Action Alternative) is a revision to guide curves and action zones that will result in a phased fall drawdown which would result in a slight increase in water level in the fall and winter. Was a full range of changes to the guide curves considered with an eye to keeping as much water in the Lake as possible without unduly increasing flood control risk? Was the proposed guide curve change offered because it is the least likely to face opposition?
3. There are a number of minimum releases, maximum flow, maximum withdrawal parameters in place that affect the lake's operation and management. Were these max./min. requirements reviewed in Toto (as a group)?

4. Did the Corps conduct a full assessment of the value and cost of the hydropower operation at Lake Allatoona? Does the requirement to have a hydropower function “cost” the lake’s operation more than “benefit” it, in the sense that operational decisions are made simply because of the requirement to produce electricity? With all competing requirements in managing the lake, does the Corps support continued hydropower production?
5. There is an environmental and economic value in retaining more water in Lake Allatoona. The risks of doing so should be manageable. The Corps formulates draft alternatives to be considered in updating the WCM, thus limiting the scope of any update severely. Quoted from the EIS: “The range of actions, alternatives, and effects considered in this EIS are driven by the requirements set forth by Congress and Corps policies for project operation.” Please help us break down that broad statement. How and by what authority can the public achieve a comprehensive zero-based-budget-type assessment of how the lake should be managed?

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Fishing**

**Outline**

Lake Allatoona is heavily used for fishing from boats and from the shoreline. Several tournaments are held on the Lake every year. Fishing contributes significantly to the local economy.

**Comments**

- When the Lake water level is dropped, it causes a hardship for those fishing from boats
- We have to beach our \$50,000-plus boats on the rocky shores because there are no docks floating in the wintertime.
- There is a lot of revenue that is lost to the areas around Lake Allatoona due to the low lake levels over the winter months.
- The constantly varying lake levels in the spring have an adverse effect on the fish spawn. The USACE should work harder to have the levels rise steadily in the spring.
- Overall, the fishermen are more concerned with winter water levels than summer water levels

**Questions**

- Does the lake really need to be dropped 17 below full pool in the winter?
- Would it be possible to try and stop at 831 feet below full pool?
- If not is it possible to extend a couple of the docks further out so they would float even when the lake is at the lowest winter draw-down level?

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Recreation**

## **Outline**

The value of the Lake in terms of recreational resources and quality of life has dramatically increased since the 1940's when the Lake was planned. Plans back then placed complete emphasis on the lake's value as to electric power and flood control – very little to no value was assigned to the use of water for quality of life and recreation uses. The four county area of the lake in the early 1950's was a very rural and poor southern Appalachian community made up of less than 100,000 people. Rural electrification was a paramount need for the area. Today, these same counties contain over 1 million people in a densely populated suburban society. The USACE has not changed its operations of the lake to recognize this dramatic shift of value.

During January and February of 2013, over 50 billion gallons of water have been needlessly drained from the lake (on top of at least that amount previously drained-out in December and January for routine winter drawdown) and dumped into the Gulf of Mexico to the benefit of nothing; this has resulted in absolutely wasted water. This happens most every year. The result of this outdated practice is that the Lake's recreational and quality of life uses are quite often dramatically impacted in the dry late-summer months. It is not uncommon for the majority of the Lake's beaches, ramps, and other recreational access points to be inaccessible to the public beginning in late July or early August. This is a travesty and a waste of our national resource.

This lake annually is one of, if not the most, heavily used USACE lakes in the nation. Annual use in most years approaches and, often, exceeds 7 million people. Small changes across a range of USACE operational practices could result in conservation of the wasted spring season water. This conservation would allow for significant improvement in lake levels and recreational uses in the later summer dry season months. Two feet of water retained in April, carefully managed, would provide for two feet higher water level in August and September.

The fact that the lake's 37,000 acres are exempted by the federal government from local property tax assessments means that about \$ 3 million has been removed from (primarily) Cherokee and Bartow County tax rolls; that amount would exceed the entire county general fund budgets of those two counties. If this amount was collected at prevailing rates, it would result in elimination of all, or almost all, such county property taxes.

The Lake's counties, in addition to shouldering the financial burden of the lake, should be able to benefit from the enormous quality of life and recreation value of the water that passes through it. The USAE must be directed to give appropriate consideration to the modern-day value of water to our local economy and to change its operations accordingly to preserve the water instead of wastefully dumping it away to the ocean.

## **Comments**

- The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water in the lake as is possible to provide for extended recreation uses.
- The USACE should immediately conduct a comprehensive financial analysis that would analyze the comparative costs and benefits of water use for local power generation as compared to use for recreation and improved local quality of life.

- The USACE in its draft EIS to its WCM update states that it does not provide navigation releases from Allatoona. That being the case, the USACE should openly provide a full analysis of its past practices in support of Alabama Power Company's (APC) hydro-power release requests, to demonstrate that APC's associated water release practices do not damage recreational benefits by using Allatoona water to support navigation in Alabama.
- The USACE should modernize its daily routine to effectively be proactive in seeking to conserve Lake water in the face of developing drought conditions and seasonal water use demand/benefits, rather than continue its practice of reactive decision-making that wastes water downstream and, thereby, limits recreational uses.
- The USACE should commission a new feasibility study as to the merits of purchasing flood easements in the Cartersville Etowah River corridor to increase flood risk management through increased discharge capacities, allowing for improved dry season recreational uses and also drought-insurance water conservation.
- The USACE should commission a new feasibility study as to the merits of constructing downstream Etowah reregulation storage capacities to increase flood risk management through increased discharge capacities, allowing for improved dry season recreational uses and drought-insurance water conservation.
- The USACE should commission a new feasibility study as to the merits of constructing, downstream from Carter Dam, Oostanaula reregulation storage facilities. This will allow the USACE to increase its ability to manage flood risk, allowing for improved dry season recreational uses and drought-insurance water conservation.
- The USACE should immediately commission a modernized update of its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities and the actual flood event history of the past 60 years. The study should include a detailed analysis of modern-day flood risk management margins as compared to the original 1950 design criteria.
- The USACE should publically disclose, in a format like its 5-week Lake level forecast curves, April-through-September lake levels compared to its shown "historical average elevation", that could have resulted if zero-benefit water releases to the Gulf had not occurred.

### Questions

1. Please explain why the 5-week lake level forecast is so routinely way out of line with actual results during the reservoir re-filling season? Please describe in detail how the USACE's daily practices actively use various real-time local weather and hydrographic data to develop its operating decisions as to reservoir outflow decisions to conserve water to the benefit of local area recreational benefits.
2. Please explain, in detail, the specific USACE procedures that are used during the dry season months that result in water conservation decisions that benefit local recreational uses at the expense of downstream (APC) power generation support.
3. In light of the modern-day (huge) value of the lake water, please explain why the USACE Zone 2 management policies (based on historically outdated criteria that give insignificant weight to water supply and recreation needs) are woefully inadequate to conserve water for its highest uses for water supply and to prepare for developing drought conditions?
4. Please provide a cost analysis that demonstrates that the subsidies given to hydropower generation through water discharges are more beneficial than the value of local recreation and quality of life uses from 7 million annual users and hundreds of millions of dollars of local economic potential.
5. Please provide an analysis that shows how much of a subsidy is given to electric companies by virtue of the artificially low (as compared to prevailing peak-season electricity market rates) cost of generated power by the releases of water during the dry season months of July, August and September.

6. Please provide a cost analysis that demonstrates that the subsidies given to the occasional Alabama River barge shipment (rather than being diverted to rail shipments) is more beneficial than the beneficial economic, quality of life and recreational value of the water.
7. How much of Alabama Power's typical request of water releases goes to provide for Alabama River navigation support during the dry season months of July, August and September? How about for 2012?
8. If Alabama Power is approved to raise the level of the Lake Martin reservoir, how will the USACE insure and publically disclose that Allatoona water does not indirectly get used to provide for that capacity, since reduced Tallapoosa River flows would at some point have to be offset by Coosa River flows to meet stated USACE navigational, power generation, and environmental flows?
9. What is the cost per ton expenditure annually by all USACE operations to provide for the barge shipments along the Alabama River between Montgomery and Claiborne Lock? How much water volume is provided annually to support such shipments (separate from M&I contracts and low-flow minimums)?
10. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, as compared to that in the 1950's, please explain why flood risk management criteria and policies do not today provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950.
11. Please provide details as to how the USACE uses and integrates NOAA field data and major weather system forecasting information to conserve water, rather than to just release water needlessly downstream because the rule-curve dictates so.
12. In light of modern weather system forecasting capabilities, please explain why excess early spring inflows should not be used conserve valuable water through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging to drought-period water supply requirements and to routine recreation needs.
13. Please explain why the enormous local economic benefit of Lake water from prospective water supply (at least \$500 million annually) and recreation (at least \$250 annually) does not justify reevaluating decades-dated criteria that sends water downstream for much less beneficial purposes. Why does the USACE not exercise its discretion and seek appropriate beneficial use of such a modern-day valuable asset as the water flowing through Allatoona?

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Water Supply & Drought Storage**

**Outline**

The value of each gallon of water that passes through the Lake has dramatically increased since the 1940's. The Lake plan then and since has focused almost entirely on flood control and electric power – very little to no value has been assigned to the use of water for local consumption or use. The USACE has not changed its operations of the Lake to recognize this dramatic shift of value.

Nothing we seek would compromise the overriding purpose of flood risk management. We merely wish the USACE to take advantage of modern technologies without increasing the risk of flooding. We ask the USACE to use best-management practices and be proactive to conserve precious water assets. Our proposed changes are minor tweaks to a complex system, but which would have an enormous benefit due to the modern-day high value of water.

During January and February of 2013, over 50 billion gallons of water were needlessly drained from the Lake (on top of at least that amount previously drained-out in December and January for routine winter drawdown) and dumped into the Gulf of Mexico to the benefit of nothing; this was absolutely wasted water. This happens most every year. At current local water utility costs, this waste represents over \$200 million of wasted water this year in just two months! Further, if just 20% of that wasted water had been retained for use moving into the historic drought of 2006, the entire drought restriction impact for Cobb, Cherokee, Paulding and Bartow Counties could have been prevented. If the USACE would adopt our proposal, there would have been no drought impact to water supply (locally) in 2006/2007.

The fact that the lake's 37,000 acres are exempted by the federal government from local property tax assessments means that about \$ 3 million has been removed from (primarily) Cherokee and Bartow County tax rolls; that amount would exceed the entire county general fund budgets of those two counties. If this amount was collected at prevailing rates, it would result in elimination of all, or almost all, such county property taxes.

The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water and follow court mandates to consider the water supply potential of the lake – including raising operational pool levels across all months as is possible and cease the routine dumping of water into the ocean.

**Comments**

- The USACE should conduct a comprehensive financial analysis that would analyze the comparative costs and benefits of water use for local power generation as compared to use for water supply.
- The USACE in its draft EIS to its WCM update states that it does not provide navigation releases from Allatoona. That being the case, the USACE should openly provide a full analysis of its past practices in support of Alabama Power Company's hydro-power release requests, to demonstrate that APC's associated water release practices do not, indirectly, use Allatoona water to support navigation in Alabama.
- The USACE should modernize its procedures to be proactive in seeking conservation of lake water in the face of developing drought conditions and seasonal water use demand/benefits, rather than continue tardy reactive decision-making that wastes water downstream. As an example, the USACE has the ability during normal seasons to lower the Lake over two feet within 24 to 36 hours and the National Weather Service Forecasts now provide the USACE more than a week of advance notice of major rain-making systems.
- The USACE should conduct updated or new feasibility studies regarding strategies to increase Lake-water retention without increasing flood risks - through increased discharge capacities and drought-insurance water conservation. In addition, the USACE should purchase flood easements in the Cartersville Etowah River corridor (instead of decreasing discharge capabilities by 33%) and construct downstream Etowah and Oostanaula river reregulation storage facilities.

- The USACE should modernize its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities and the actual flood event history of the past 60 years, to demonstrate the historically improved flood control margins over the 1950's assumed design criteria.
- The USACE should publically disclose, in the format of its 5-week Lake level forecast, an April-through-September lake levels comparison of its "historical average elevation" compared to the levels that could have resulted if wasteful ocean water dumps had not occurred.

### Questions

1. Please explain why the 5-week lake level forecast so routinely and commonly way out of line with actual results during the reservoir re-filling season? Please describe in detail how the USACE's daily practices use various real-time local weather and hydrographic data to develop its operating decisions as to reservoir outflow decisions so as to conserve water.
2. Please explain, in detail, the specific USACE procedures that are used during the dry-season-months that result in water conservation decisions at the expense of downstream (APC) power generation support.
3. Please explain where, if any, the USACE Zone 2 management policies look forward rather backward, to conserve water for local use, when there are developing drought conditions?
4. Please provide a cost analysis that shows a comparison of hydropower generation water costs and benefits as compared to the market value of locally sold water (about ½ cent per gallon).
5. Please provide a cost analysis of the subsidies given to electric companies through the artificially low (as compared to prevailing peak-season electricity market rates) costs charged them for water releases to generate power during the dry season months of July, August and September.
6. Please provide a cost analysis that compares the subsidies given to the occasional Alabama River barge shipment through Alabama Power water releases that are based on Allatoona water (focused on such shipments' alternate rail shipping costs) to the market value of locally sold water (about ½ cent per gallon).
7. How much of Alabama Power's typical request of water releases goes to provide for Alabama River navigation support during the dry season months of July, August and September?
8. If Alabama Power is approved to raise the level of its Lake Martin reservoir, how will the USACE insure and publically disclose that Allatoona water does not indirectly get used to provide for that capacity, since reduced Tallapoosa River flows would at some point have to be offset by Coosa River flows to meet stated USACE downstream navigational, power generation and environmental flows?
9. What is the annual total USACE cost per ton (water flow, dredging, lock and dam management) to provide for the barge shipments along the Alabama River between Montgomery and Claiborne Lock? How much water volume is provided annually to support such shipments (separate from M&I contracts and low-flow minimums)?
10. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, and the large value of water locally, please explain why flood risk management criteria and policies cannot be tweaked and improved to provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950.
11. Please provide details as to how the USACE uses and integrates NOAA field data and major weather system forecasting information to conserve water, rather than to just release water needlessly downstream simply because the rule-curve dictates so.
12. In light of modern weather system forecasting capabilities, please explain why excess and valuable early spring Lake water inflows should not be conserved through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging to drought-period water supply requirements and to routine recreation needs.



Lake Allatoona Association  
Lake Allatoona & Upper Etowah River Basin  
Water Management Position Paper

After years of discussion, negotiation and litigation regarding North Georgia water resources and their usage allocation, the recent Federal Court ruling has created focus on the issue at all levels. Upper Etowah River basin flows and Lake Allatoona (Lake) water storage and water quality are clearly involved in the overall issue. The Lake Allatoona Association (LAA), provides this document to outline its position and goals relating to its long-term goals for Lake management and the current issue of water allocation.

As the community-based voice of Lake Allatoona, LAA's mission is to improve our Lake's water quality and pool levels through encouragement of healthy lake use practices. The LAA links a large number of like-minded people to positively influence governments (federal, state and local) and citizens (e.g. boaters, adjoining owners, and recreational users) who work together to improve water quality and pool levels. Focused on the two keys to improvement – the US Congress and the US Army Corps of Engineers – LAA's large and growing membership base is committed to push the Congress and the Corps toward positive changes for Lake Allatoona's benefit.

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The LAA's positions are a direct outgrowth of its responsibility for leadership and representation of local citizenry interests in stewardship of the God-given and mankind-enhanced environment with which our community has been blessed. The LAA believes that the execution of a combination of the below outlined recommended changes could result in routine Lake water levels improvements with a two foot increase in normal summer pool level, begun 4 weeks earlier, held 6 weeks longer, and an 8 feet winter pool drawdown reduction. Shorthand for this overall program is "2 – 4 – 6 – 8, Allatoona Clean".

This overall water level/stability improvement would support five important outcomes:

Desired Outcomes

1. Increase NW Georgia water supplies.
2. Reduce water quality degradation.
3. Improve Alabama River navigation water release capabilities.
4. Improve Lake Allatoona recreation benefits.
5. Continue to support power generation and flood control needs.

This Position Paper's following recommendations are directed toward the four entities which are critical to the Lake's operation and so-called water wars: US Army Corps of Engineers (USACE), B. State of Georgia (GA), C. State of Alabama (AL)) and D. the Southeastern Power Administration (SEPA).

A. U.S. Army Corps of Engineers (USACE)

1. USACE Lake Allatoona operations procedures should be modernized and updated to provide for proactive preservation of the Upper Etowah's precious and limited water flows through more appropriate flood control statistical methods and practices to allow for less wasted winter wet period water flows and increased winter storage.
2. USACE Lake Allatoona operations procedures should be modified to pay more attention and reduce the major exposures of barren shoreline from Lake level fluctuations. Improved practices should be implemented to better comport with existing state storm water runoff and sedimentation environmental laws regarding siltation and sedimentation control.
3. USACE should modernize the basis for its rule curve assumptions to provide for more effective deployment of Lake Allatoona's storage capability through proactive rather than reactive USACE basin management strategies. These techniques should utilize modern computer-based modeling software to "look ahead – not back" when developing discharge and generation plans. The Corps should use real-time actual local basin hydrology data and National Weather Service intelligence instead of historical averages when possible.
4. USACE should conduct a modernized and multi-disciplined flood retention risk analysis study and report on the feasibility of increasing Lake Allatoona's vertical pool storage target levels geared to a 2 foot increase in normal summer pool level; begun 4 weeks earlier; held 6 weeks longer; coupled with an 8 feet winter pool drawdown reduction.
5. USACE Lake Allatoona lake level management practices geared to fish spawning criteria at the expense of water storage factors should be modified.
6. USACE Lake Allatoona policies should be corrected to give proper recognition to the annual \$250 million economic development benefit and approximately 2000 local jobs creation benefits that accrue from the recreation purpose of the Lake's original development. For example, holding to the Rule Curve would support this original purpose allowing longer use of the Lake during the year.
7. USACE should provide significantly more transparency and real-time reporting in regards to: Altered Lake discharge volumes, reasons for such changes; Alabama River barge traffic utilization; coordination with Alabama Power as to water release cooperation, power generation costs, benefits and revenues; graphical-consolidated pool, discharge and inflow data to include USACE's Allatoona (Etowah) and Alabama Power's Martin (Tallapoosa); and lake water quality impairment practices.
8. USACE should cooperatively work with GA and AL, involving the U.S. Congress, to achieve the above objectives.
9. USACE should conduct a study to determine what the peak boat capacity is for the Lake. Excess peak period usage causes dangerous conditions and damaging Lakeshore erosion. As part of this study, the USACE should evaluate whether innovative marina and ramp usage peak period tariffs could mitigate such conditions.

B. State of Georgia (GA)

1. GA should not consider nor allow additional inter-basin transfers that would serve to reduce inflows and/or increase outflows from Lake Allatoona – not to Alabama's Tallapoosa basin nor to Georgia's Chattahoochee basin.
2. Existing GA erosion and sedimentation control efforts should be continued and intensified within the entirety of the Lake Allatoona drainage basin.
3. GA policies should reserve and allocate Lake Allatoona water consumption to the region which provides for its existence through public-use set-aside of its 25,000 plus acres and resultant annual sacrifice of over \$5 million local property tax base revenues (Bartow, Cherokee, and Cobb plus Paulding and Gordon Counties).
4. GA should work with LAA and other involved entities to maximize, to the extent practical, watershed protection practices, particularly for specific sensitive sub-basins.
5. GA should cooperatively work with USACE and AL, involving the U.S. Congress, to achieve the above objectives.
6. GA should work with AL to identify mutual benefits from equitable, efficient and effective joint use of all regional river basin flows.
7. GA should initiate appropriate and comprehensive processes necessary to ensure wise and efficient citizenry water conservation and usage practices.
8. GA should develop and execute a Public Relations effort to ensure that the facts regarding water availability and use are widely known.
9. GA should ensure that any amount of water withdrawn from the Lake is returned after treatment to at least pre-withdrawal quality levels.
10. GA should consider placing a tax on boats by weight to help prevent Lakeshore damage by boat wave action. Monies raised should be used to fund Lakeshore restoration and armoring.
11. GA (EPD) and the local counties should collect Lake water samples to determine areas with serious water quality issues resulting from leaking septic tanks. The State should pass legislation requiring that lakeshore septic tanks and drain fields be periodically tested and, if found to be leaking, require repair or replacement.
12. GA should work with the USACE to implement shoreline hardening and other aggressive sedimentation/erosion techniques by adjoining property owners.

C. State of Alabama (AL)

1. AL should develop an Alabama River Basin management plan that would provide for more effective utilization of the flows that originate within its borders rather than focus on capturing control of the flow that comes to AL from Lake Allatoona (over 70% of the water that falls or flows into AL originates in AL).
2. AL should develop an Alabama River navigation management plan that more effectively deploys its extensive system of locks and dams to manage river flows presently provided carte blanche in favor of a very few beneficiaries' commodity transportation options.
3. AL should work with GA to identify mutual benefits from equitable, efficient and effective joint use of all regional river basin flows.
4. AL should develop and implement a comprehensive Alabama River basin water conservation plan.
5. AL should cooperatively work with USACE and GA, involving the U.S. Congress, to achieve the above objectives.

D. Southeastern Power Administration (SEPA)

1. USACE Lake Allatoona power generation practices should be modified so as to be based on market-based electricity pricing models rather than the current method which only seeks to recover end-of-life depreciation cost factors.
2. SEPA should provide significantly more transparency in regards to the generation of hydroelectric power, including the provision of online reporting of cost/benefits/revenues, hours of generation and “avoided” generation options.
3. SEPA, the USACE and Congress should acknowledge that the initial investment of federal expenditures has been returned in full from over 55 years of Allatoona generation revenues and relinquish some operations oversight and control to local communities.

Outcomes Associations to Recommendations

Desired Outcomes

1. Increase NW Georgia water supplies.
2. Reduce water quality degradation.
3. Improve Alabama River navigation water release capabilities.
4. Improve Lake Allatoona recreation benefits.
5. Continue to support power generation and flood control needs

Associated Supportive Recommendations

<u>Outcome</u>	<u>A. USACE</u>	<u>B. GA</u>	<u>C. AL</u>	<u>D. SEPA</u>
1	1,3,4,5,7,8	1,5,6,7,8	1,2,3,4,5	1,2,3
2	2,3,4,5,7,8	2,2,4,5,6,7,8,9,10,11,12	3,5	1,2,3
3	1,2,3,4,5,7,8	1,3,5,6,7,8	1,2,3,4,5	1,2,3
4	3,4,5,6,7,8,9	1,2,3,5,6,7,8,10,11,12	1,2,3,4,5	1,2,3
5	1,2,3,4,5,7,8	5,6,7,8	3,5	1,2,3

**KEITH R. MCLAUGHLIN  
1711 ALETA DRIVE  
MARIETTA, GEORGIA 30066**

April 19, 2013

Commander  
U.S. Army Corps of Engineers  
Mobile District  
Attn: PD-EI (ACT-DEIS)  
P.O. Box 2288  
Mobile, Alabama 36628

Dear Sir;

The following are my comments on the Draft Environmental Impact Statement (DEIS) for the Alabama-Coosa-Tallapoosa (ACT) river basin. I have categorized my comments as General, Management Measures Eliminated from Further Consideration, Description of the Proposed Action and Alternatives, Affected Environment, Glossary, Environmental Consequences, and Other. Although my comments are focused more on Lake Allatoona and its drainage area; I believe that almost all of them, especially for the Affected Environment, and Environmental Consequences, apply to the other projects considered in the DEIS.

**GENERAL COMMENTS**

1. The USACE has preempted the purpose for comments on the DEIS. This “short circuiting” of the process, violates the requirements for decision making by Federal Agencies in the National Environmental Policy Act P.L. 91-190, 1969 (NEPA), The Council of Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1500.2, 40 CFR 1500.3, 40 CFR 1502.2(g), 40 CFR 1503.4(a)(1)(2)(3)(4)(5), 40 CFR 1506.1, and USACE regulation ER 1110-2-240, 9(c)(d)). The Environmental Impact Statement (EIS) is a draft but the Water Control Manuals (WCM) are final drafts. It appears that the Final Drafts of the WCM have been prepared before the decision maker has made and documented their decision in the Record of Decision. This is in violation of 40 CFR 1500.2, 40 CFR 1500.3, 40 CFR 1502.3, 1506.1 and if not the letter, the spirit and intent of P.L. 91-190.

2. The USACE has preempted the NEPA process and is in violation of the requirements for decision making by Federal Agencies in the National Environmental Policy Act P.L. 91-190, 1969 (NEPA), The Council of Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1500.2, 40 CFR 1500.3, 40 CFR 1502.2(g), 40 CFR 1503.4(a)(1)(2)(3)(4)(5), 40 CFR 1506.1 and USACE ER 1110-2-240, 9(c)(d)). The Master Water Control Manual, Alabama-Coosa-Tallapoosa (ACT) River Basin, Alabama, Georgia, Final Draft, (FDMWCM) and the Alabama-Coosa-Tallapoosa River Basin Water Control Manual, Final Draft, Appendix A, Allatoona Dam and Lake, Etowah River, Georgia (FDWCMAE) are much less encyclopedic and more analytic than the DEIS. The information, data, and presentations in

the FDMWCM and FDWCMAE are more comprehensive, current, and pertinent to describing the affected environment than the encyclopedic and disjointed description of the affected environment in the DEIS. The writing styles are significantly different for the FDMWCM and FDWCMA compared to the writing style in the DEIS. It appears that A) The FDMWCM and FDWCMAE were prepared by different people than those who prepared the DEIS, B) The information in the FDMWCM and FDWCMAE was not shared with the preparers of the DEIS, and C) the preparers of the FDMWCM and FDWCMAE were working independently from the preparers of the DEIS and produced the FDMWCM and FDWCMAE independent from the DEIS. It appears that the FDMWCM, FDWCMAE, and the other Final Drafts of the Water Control Manuals were prepared before the decision maker has made and documented their decision in the Record of Decision. This is in violation of 40 CFR 1500.2, 40 CFR 1500.3, 40 CFR 1502.3, 40 CFR 1500.6, and if not the letter, the spirit and intent of P.L. 91-190.

3. In the interest of transparency, the USACE should issue a Public Notice disclosing the preparers for the Final Drafts of the Water Control Manuals, and the respective time lines for the preparation of the DEIS and Water Control Manuals.

4.. The USACE should prepare a five-year action plan to address water quantity, quality, and timing (QQT) issues on lands not controlled by the USACE. The plan should include goals and objectives for working with other Federal Agencies and State, County, Municipal governments, Universities, Non Government Organizations, Private land owners, and individuals. It should be included as a mitigation measure in each alternative. This is needed since the USACE puts itself in a reactive (pp 6-119, Lines 1-6) rather than a proactive position in resolving issues (ie land use, stream and land surface erosion, the application of appropriate measures to control non point and point sources of pollution, impaired waters, TMDL's, and etc.) occurring in the ACT basin that affects the QQT of water entering Lake Allatoona and the other ACT reservoirs, streams/rivers. The five-year action plan would help the USACE achieve its mission (ER 1110-2-8154 6(b), 7(a)). Without working with others in the drainage area, including those with legal authority, the USACE unnecessarily risks its success as stewards of Lake Allatoona and the rest of the ACT; particularly when Federal and State water quality regulatory agencies are concerned with the eutrophication of lakes, suspended sediment, nutrients, and fecal coliform (pp 2-115, Lines 4-10, pp 2-117, Lines 39-42, pp 2-118, Lines 1-5, pp 2-134, Lines 17-23, pp 2-143, Lines 9-18, pp 2-151, Lines 23,24).

5. The USACE should include the drainage basin for Lake Allatoona in the EIS. It should be described in the Affected Environment (40 CFR 1502.15, 40 CFR 1508.3) and its effects disclosed in Environmental Consequences (40 CFR 1502.16). The hydrologic connection/relation between Lake Allatoona and its drainage basin is undeniable. This relationship is two ways, especially considering fish passage between Lake Allatoona and the tributaries in its basin (pp 2-115, Lines 4-10, pp 2-117, Lines 39-42, pp 2-118, Lines 1-5, pp 2-134, Lines 17-23, pp 2-143, Lines 9-18, pp 2-151, Lines 23,24, pp 2-198, Lines 23-45, pp 2-199, Lines 1-15, Final Draft, Appendix A, Allatoona Dam and Lake Etowah River Georgia ((FDWCMAE)), pp 4-2, Lines 20-26, pp 4-13, Lines 9-15 and Table 4-6, pp 4-14, Table 4-7, pp 5-6, Lines 8-18, pp 6-1 Lines 8-11,28-29, pp 6-2, Lines 25-32, pp 6-3, Lines 9-10).

## **MANAGEMENT MEASURES ELIMINATED FROM FURTHER CONSIDERATION**

1. The USACE is arbitrary and capricious in its eliminating the alternative for raising Lake Allatoona two feet to a conservation pool elevation of 842 feet or to raise the winter pool above 823 feet (pp ES-11, Lines 3-5) for further consideration.

(a) To be in compliance with 40 CFR 1502.4(a), and PL 91-190, Section 102(E), the USACE should develop and analyze a greater range of alternatives that include a greater range of elevations for the winter and conservation pools than the current four alternatives. The USACE does have the discretionary authority to consider this and other alternatives that raise the conservation pool above 840 feet and/or raise the winter pool above 823 feet (pp 4-5, Lines 10-17) but chooses not to exercise it. This decision has prevented the development of a full range of alternatives for consideration.

(b) The USACE should disclose flood risk/hazard management that includes the flood pool and flood storage, (FDWCMAE, pp 7-4, Lines 8-13). Flood risk/hazard management is the management of the flood pool and flood storage..The flood pool for Lake Allatoona, is the area between the the bottom of the spill way elevation of approximately 860 feet down to the elevation of 840 feet (FDWCMAE, pp 7-1, Lines 28-38). Flood storage is the capacity available between 840 feet down to the bottom of the reservoir. This is consistent with EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-6a,b,d, and 11-1h which defines flood storage as any elevation from the bottom of the reservoir to the bottom of the spillway. To manage flood risk, the USACE can operate the Allatoona Dam to release water, if the winter pool is held at elevations greater than 823 feet (DEIS, pp 2-73, Lines 7-9, , pp 7-6, Lines 7-12). This gives the USACE the capability to retain the combined capacity in the flood pool and flood storage to handle forecasted floods. Doing this will increase the number of alternatives that can be considered.

(c) The USACE should use a “modified induced surcharge operation” similar to the induced surcharge operation for flood zones D and E illustrated in FDWMCAE, Appendix A, Plate 7-2. This modified induced surcharge operation is implemented when the water level of the Lake approaches a designated elevation in the flood pool. The modified induced surcharge operation would release water from Lake Allatoona at a rate up to 9500 cfs until the Lake level is at the elevation for the conservation pool. The objective would be to permit higher winter pools without significantly (40 CFR 1508.27) increasing flood risk. Doing this will increase the number of alternatives that can be considered.

(d) The USACE, to be in compliance with PL 91-190 and 40 CFR 1500.1(b), should disclose the difference and significance (40 CFR 1508,27) between various flood management strategies, (ie winter pools greater than those considered in the alternatives in the EIS) and the associated flood risks with and without modified induced surcharge operations.

(e) The USACE should correct its terminology for Flood storage, as used in the DEIS, to comply with EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-6a,b,d, and 11-1h. The EM defines flood storage as any elevation from the bottom of the reservoir up to the bottom of the spillway.

(f) Flood storage is cited as the primary reason for eliminating other alternatives for consideration, and prevented the consideration of other alternatives. To comply with P.L. 91-190, 40 CFR 5002.14, 40 CFR 1502.14, 40 CFR 1502.3, 40 CFR 1502.6; 40 CFR 1508.8; the USACE should disclose by alternative: 1.) The capacity to retain water by the flood storage shown in the Management Curves for each alternative in the EIS, 2.) The return frequency, quantity of water, and peak flow of the flood that the flood storage is intended to contain, and 3) The flood risk and its significance (40 CFR 1508.27) associated with the flood storage shown in the Management Curves for each alternative in the EIS. The disclosures should be in the Affected Environment and Environmental Consequences.

g) The USACE to be in compliance with P.L. 91-190, 40 CFR 15002.14, 40 CFR 1502.15, 40 CFR 1502.6 should demonstrate how the alternatives not considered effect regulated release rates (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-2 (a)(b)(c)(d)(e)(f)(g) and changing hydrology (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 11-1c). Without this demonstration USACE is arbitrary and capricious in eliminating these alternatives for consideration.

(h) Perhaps the USACE is not considering other alternatives since more methods and greater/different skills of USACE personnel are required to implement them compared to those needed to implement the four alternatives that are considered. Admittedly the alternatives that are not considered may require greater skill in the operation of Lake Allatoona Dam. However, USACE, ER 110-2-240 7(e), assigns the responsibility for needed improvement of methods and staff training to Division and District commanders to operate Lake Allatoona. Therefore, methods and skills should not be a barrier to considering alternatives that are in addition to and/or different from the current four.

2. The USACE should consider and analyze the following alternative in the Environmental Impact Statement (EIS). The purpose for this alternative is to address the public issue/concern for a winter pool at an elevation greater than 823 feet and results in benefits that the current alternatives do not provide.

#### PROPOSED ALTERNATIVE

Prolong the draw down of water in Lake Allatoona by reducing the rate of water releases than any of the alternatives considered in the DEIS. The rate of this draw down should meet the fall water needs for fisheries in Lake Allatoona, (pp ES-58, Lines 31-34, pp 2-71, Lines 38,39, pp 6-148, Lines 8-13), prolong the availability of water for agricultural use down stream from Lake Allatoona (pp 2-241, Lines 3-16), help to supplement the supply of water for M&I use by Rome, Georgia (pp 2-28, Lines 32, 33), increase the number of days for Lake accessibility for all



impact ranges (pp 6-185, lines 17-40, pp 6-186, Lines 1-2, Table 6.6-26). Unlike the Proposed Action in the DEIS, this alternative would be a “smoother” curve for draw down especially for the months of October through December so as to avoid the sudden drops in pool elevation occurring during these months (pp 6-162, Table 6.6.3). This would also aid in increasing water conservation (ER 1110-2-240 6(d)), and reduce the potential for shoreline erosion (Affected Environment, comment 15). The winter pool would be held at approximately 830 feet or higher depending upon the significance of the associated flood risk with the modified induced surcharge operation. (See Management Measures Eliminated from Consideration, comments 1(a)(b)(c)(d)(e)). There is flexibility in the production of hydropower by Lake Allatoona (pp ES-5, Lines 43-45, pp 2-68, Lines 20-27, pp 2-237, Lines 17-21, pp 2-239, Lines 12-13). Although some flexibility in power production is for critical drought periods; additional flexibility in power production has also been used in the Proposed Action. Therefore, flexibility in power production, in addition to drought conditions, should be included for this alternative

**DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES**

1. The USACE should consider more alternatives than the current four to be in compliance with P.L.91-190, Section 102(E), 40 CFR 1502.14 (See General Comments 1-2). The Proposed Action and the other alternatives fail to address the public issue/concern for a winter pool that is greater than 820 feet and, therefore, the range of alternatives is inadequate and the reasons for not considering these alternatives is arbitrary and capricious (See Management Measures Eliminated from Further Consideration, comments 1(a)(b)(c)(d)(e)(f)(g) and 2.). Exhibit 1 is a comparison of the Proposed Action and the other three alternatives. There is very little difference between/among the four alternatives considered in the EIS.

**EXHIBIT 1: COMPARISON OF PROPOSED ACTION AND OTHER ALTERNATIVES**

	<u>ALTERNATIVES</u>			
	<b>G</b>	<b>D</b>	<b>F</b>	<b>NO ACTION</b>
Implement a revised APCDOP... (pp 5-11, Lines 7-8)	Yes	Yes	Yes	No
Provide for seasonal navigation... (pp 5-11, Lines 9-17)	Yes	Yes	Yes	Yes
APC projects on the Coosa and Tallapoosa Rivers... (pp 5-11, Lines 11-22)	Yes	Yes	Yes	Yes
The APC project H. Neely... (pp 5-12, Lines 1-3)	Yes	Yes	Yes	Yes
Specified flow requirements at Lake Allatoona... (pp 5-12, Lines 4-5)	Yes	Yes	Yes	Yes
Phased fall draw down and reduced hydro power generation...(pp 5-12, Lines 6-13)	Yes	No	No	No

EXHIBIT 1: COMPARISON OF PROPOSED ACTION AND OTHER ALTERNATIVES  
(Con't.)

	<u>ALTERNATIVES</u>			
	<b>G</b>	<b>D</b>	<b>F</b>	<b>NO ACTION</b>
The current minimum flow... (pp 5-12, Lines 14-21)	Yes	No	Yes	No
The Corps reserves 6,771 acre-feet for... (pp 5-12, Lines 22-24)	Yes	Yes	Yes	Yes
The Corps reserves 818 acre-feet for... (pp 5-12, Lines 25-26)	Yes	Yes	Yes	Yes
The Corps would continue to manage fish spawning operations...(pp5-12, Lines 27-34)	Yes	Yes	Yes	Yes
The Corps would continue migratory fish passage... (pp 5-12, Lines 35-36)	Yes	Yes	Yes	Yes
Refined operations at Carters Lake... (pp 5-10, Lines 35-36)	No	No	Yes	No
Refined operations at Allatoona Lake... (pp 5-10, Lines 3-10)	No	No	Yes	No
Two Action Zones...(pp 5-4, Lines 9-19)	No	No	No	Yes
Four Action Zones...(pp 5-7, Lines 26-29, pp 5-10, Lines 4-10, pp 5-12, Lines 6-10)	Yes	Yes	Yes	No
Winter Pool less than 823 feet elevation. (pp 5-5, pp 5-8, pp 5-11, pp 5-13, FDWCM AE, Plate 7-2)	No*	Yes	Yes	Yes

\*Zone 4 in this alternative does go down to 818 feet (FDWCM AE, pp 7-3, Table 7-1, and Plate 7-1).

2 The USACE to be in compliance with 40 CFR 1502.14(f), and ER 1110-2-8154(8) should describe monitoring and mitigation measures associated with each alternative.

3, The USACE, to be in compliance with 40 CFR1502.14(f) should include the Five Year Action plan for addressing issues on lands that it does not control (See General Comment 4) as a mitigation measure for all alternatives.

4. The USACE, to be in compliance with 40 CFR 1502.14 (f) should work with others (See General Comment 4) to establish permanent channel cross sections through out the ACT as a monitoring and mitigation measure for all alternatives. The purpose for the permanent channel cross sections is to determine the degree of change in channel morphology due to USACE operations and/or by other land owners. These Channel Cross Sections should be representative of stream type (ie Rosgen, David.1996.Applied River Morphology. Wildland Hydrology. Pagosa Springs, Colorado, Chapters 3-8: Leopold, Luna B.1994.A View of the River. Harvard University Press, Cambridge, Massachusetts and London, England, pp 20-21), stream order, (ie Dunne, Thomas and Luna B. Leopold.1978. Water in Environmental Planning. W. H. Freeman Company, New York, pp 496-500; Leopold, Luna B.1994.A View of the River. Harvard University Press, Cambridge, Massachusetts and London, England, pp 223-232; Maxwell, James R., Clayton J. Edwards, Mark E. Jensen, Steven J.Paustian, Harry Parrott, and Donley M. Hill.1995.A Hierarchical Framework of Aquatic Ecological Units in North America (Nearctic Zone). General Technical Report NC-176. United States Department of Agriculture, Forest Service, North Central Forest Experiment Station. Appendix A. The priority for establishing permanent channel cross sections should be for perennial, intermittent and ephemeral streams (Langbien, W. B. and Kathleen T. Iseri.1960.General Introduction and Hydrologic Definitions, Manual of Hydrology: Part 1. General Surface-Water. Geological Survey Water Supply Paper 1541. United States Printing Office, Washington,.pp 18.
5. To comply with the Federal Water Pollution Control Act of 1948 as amended (P.L. 80-845) and ER 1110-2-8154, the USACE should, by alternative, describe water quality management objectives.
6. To comply with the Clean Water Act (CWA) (P.L. 95-190) and ER 1110-2-8154, the USACE should, by alternative, describe the Best Management Practices (BMP's) to control Non Point Sources of Pollution on lands controlled by the USACE.
7. The USACE should complete, by alternative, a cost benefit analysis (40 CFR1502.23) This analysis should include power production, flood risk management, recreation, M&I water supply, agriculture, fisheries, water quality, and etc.

### **AFFECTED ENVIRONMENT**

1. The USACE should edit/rewrite the Affected Environment to produce a product that is complete and in compliance with PL 90-191, 40 CFR 1500, USACE regulations and guidance. The description of the Affected Environment is more encyclopedic than analytic (40 CFR 1500.4(a)(b), 40 CFR 1502.15, 40 CFR 1502.2(a)). Most of the description for the Affected Environment is a compilation of data and information with little evaluation as to what its relationships are and how it pertains to the Affected Environment for the ACT.
2. The USACE should group the projects by Physiographic Province and describe the Affected Environment by Physiographic Province (FDMWCM, Plate 2-3).to be in compliance with 40 CFR 1500.4(a)(b)(d)(e), 40 CFR 1502.15, 40 CFR 1502,29(a),and 40 CFR 1508.3. The area of the ACT basin is very varied and using Physiographic Provinces will help focus the

writeup for the Affected Environment (40 CFR 1502.15). The result will help in more clearly disclosing the Environmental Consequences for each alternative (40 CFR 1502.16, 40 CFR 1508.8). The current writeup for the Affected Environment is incomplete, is a compilation of data and information that is usually extraneous and its presentation lacks clarity, continuity, and fails to disclose the interrelationship of the data and information and how it is pertinent to the affected environment.

3. Lake Acworth, an impoundment within Lake Allatoona, is not identified and described in the Affected Environment. To be in compliance with 40 CFR 1502.15 the USACE should include the following in the Affected Environment for the EIS:

(a) describe Lake Acworth in terms of its extent and relationship with flood hazard management, water levels, water quality, and etc in Lake Acworth and Lake Allatoona (FDWCM AE, pp 2-5, Lines 13-35, pp 4-13, Lines 6-7). The omission of Lake Acworth in the DEIS substantiates General comment 2.

(b) Explain why Lake Acworth is held at a “unfluctuating level” (FDWCM AE, pp 2-5, Lines 19-23) other than current contractual arrangements; rather than be managed to higher winter and conservation pools in the whole Lake Allatoona. The most appropriate to be in compliance with 40 CFR 152.04 is to consider flood risk management alternatives that involve fluctuating the water level in Lake Acworth to increase the elevations for winter and conservation pools for the entire Lake.

4. The USACE should comply with 40 CFR 1502.15 and describe the Hickory Lake Project (FDWCM AE, pp 4-13, Lines 2-6) in terms of its extent and relationship with flood hazard management for Lake Allatoona, QQT of water inflow into Lake Allatoona, and etc. Currently the Hickory Log Creek Project, upstream from the Allatoona Dam is not identified and described in the EIS. The omission of the Hickory Lake Project in the DEIS substantiates General comment 2.

5. The USACE, to be in compliance with 40 CFR 1502.14, 1502.15, 1502.16, and P.L. 91-190 sections 102(2)(C)(iii), 102(2)(E), 102(2)(C)(i), (ii), (iv), and (v) should describe the erosion mentioned on pp ES-49, Lines 32-43, pp ES-50, Lines 1-16 in the affected environment, include the associated mitigation for this erosion by alternative, and the environmental consequences disclosed by alternative.

6. The USACE should edit/rewrite the information regarding shore line erosion (pp ES-50, Lines 1-5, 10-16, pp ES-69, Line 8, pp 2-167, Lines 32-36 and in the FDWCM AE pp 5-6, Lines 1-7, Lines 19-30).

(a) The description of shore line erosion in the FDWCM AE is much more informational and pertinent to describing affected environment than the encyclopedic and incomplete description in the DEIS. To comply with 40 CFR 1502.15, the USACE should edit/rewrite the EIS using the information in the FDWCM AE. This information should be supplemented with the extent (acres and miles) occurring in each class described in the FDWCM AE on pp 5-6, Lines 1-7. The USACE should include, to be in compliance with 40 CFR 1502.4, the mitigation measures for shoreline erosion as part of the

description for each the alternative in “Description of Proposed Action and Alternatives” to be in compliance with 40 CFR 1502.4. The difference between the DEIS and FDWMCAE substantiates General comment #2..

(b) The USACE, to be in compliance with 40 CFR 1502.24 should include Webster's definition for shoreline in the Glossary. Webster defines shoreline as: “the line where a body of water and the shore meet”.

(c) The USACE to comply with the CWA, 40 CFR 1502.14, ER 1110-2-8154 should describe for each alternative; the BMP's and mitigation measures to prevent erosion from the shoreline caused by runoff from land areas at higher elevations than the shoreline, direct impact by precipitation on the shoreline, wave action caused by prevailing winds and water craft use in the Lake, and other uses of the shoreline (ie fishing, docks and boat ramps, marinas etc.) The elevation, for ”Shoreline erosion areas” is on pp 6-120, Environmental Consequences. The area between elevations 823 feet and 840 feet is terrestrial and subject to NPS of pollution control per the CWA.

7. Did the water quantity modeling referred to on pp 2-3, Lines 1-6, include flood risk management analyses? If not, please explain why flood risk management was not analyzed. If it was included, the results should be disclosed in the affected environment (40CFR 1502.15), any resulting mitigation measures included in the description of the alternatives (40 CFR 1502.14), and the effects in environmental consequences (40 CFR 1502.16).

8. The USACE should edit/rewrite the description for precipitation (pp 2-4, Lines 6-22, pp 2-5, Figures 2.1-2 and 2.1-3). The current description is extraneous and not pertinent. The “water management curves” for the alternatives are on a monthly basis. To be applicable and meaningful, average, maximum, and minimum precipitation should be presented on a monthly basis. This data should be available since it appears that the USACE is in compliance with ER 110-2-240 6e (See FDMWCM, pp 2-11, Lines 2-21, pp 2-12, Tables 2-7, 2-8, pp 2-13, Table 2-9 and FDWCMAE, .pp 4-4, Table 4-3 in the maximum and minimum monthly precipitation should be determined from the same precipitation records used to prepare the previously cited tables. The difference in fact and presentation of precipitation between the DEIS and the FDMWCM, FDWCMAE substantiates General comment 2.

9. The USACE should describe the amount of direct precipitation into the impoundments by month. Direct precipitation into the impoundments is useful in achieving water conservation and its efficient management (ER 1110-2-240, 6d). Extreme rainfall should be disclosed in the EIS (FDWMCAE pp 4-6, Table 4-4). To avoid being more encyclopedic than analytic, precipitation return frequencies associated with the extreme events should be presented.

10. The USACE should edit/rewrite the description for air temperature. The current description of Existing Climate is not pertinent (pp 2-168, Lines 12-28). The “water management curves” for the alternatives are on a monthly basis. To be applicable and meaningful average, maximum, and minimum air temperatures should be presented on a monthly basis. It appears that the

USACE is in compliance with ER 110-2-240. Refer to pp 2-8, Lines 2-18, pp 2-9, Table 2-4, pp 2-10, Table 2-5, pp-2-11, Table 2-6 in the FDMWCM, and pp 4-3, Lines 4-15 and Table 4-2 in the FDWCMAE. The average monthly air temperatures should be determined from the same air temperature records used to prepare the previously cited tables. This difference in fact and presentation between the EIS and the FDMWCM, FDWCMAE substantiates General comment 2. NOTE: The last columns in the cited air temperature tables in the FDMWCM and FDWCMAE appear to be mislabeled.

11. The USACE, to be in compliance with 40 CFR 1502.15, 40 CFR 1508.3, should describe evaporation from the Lake Surface, by monthly average, maximum, and minimum. Evaporation of water from lake surfaces is important to managing water efficiently (ER 1110-2-240 6(d)).

12. The USACE, to be in compliance with 40 CFR 1502.24, ER 1110-2-240 6(d)(e) should include for each alternative the monitoring of pan evaporation. This data is important for managing water efficiently (ER 1110-2-240 6(d)). ER 1110-2-240 6e; Dunne, Thomas and Luna B. Leopold.1978. Water in Environmental Planning. W. H. Freeman Company, New York, pp 95). One objective for monitoring pan evaporation would be to verify the precision and accuracy of the indirect method (FDWCMAE, pp 4-9, Lines 6-8, 10-13) currently used to estimate evaporation from the Lake surface.

13. The USACE, to be in compliance with 40 CFR 1502.24 should use the entire record for flow data. The reason for shortening the period of record for the cited gage (pp 2-10, Lines 15-18, Table 2.1-1, pp 2-161, Lines 22-23) is an unusual professional practice. By shortening the record, the flows resulting from storms in 1961, and 1964 are not accounted for, let alone other flows occurring during the period of record. Not using the entire period of record does have an effect on determining flow durations and return frequencies.

14. The USACE should reconstruct Table 2.1-1 in the EIS and other tables using the entire period of record. The return frequency for the Maximum, Minimum, and Mean Monthly Flows should be disclosed. The disclosure is pertinent to the efficient management of water (ER 1110-2-240 6d) and flood risk management (ER 1110-2-240 6g).

15. The USACE should present flood storage as used in the EIS; for the projects on pp 2-20, Table 2.1-4, pp 2-21, 2.3-5. This is important information since flood storage is used as the primary reason for not considering alternatives other than the current four (Management Measures Eliminated from Further Consideration, comment 1(f)). It is also important for the efficient management of water (ER 1110-2-240 6d) and flood risk management (ER 1110-2-240 6g)..

16. The USACE should discuss hydraulic conductivity in relation to shorelines of reservoirs and the environmental consequences with various rates drawing down water in the reservoirs. Hydraulic continuity (pp 2-63, Lines 4-8) also applies to shorelines of reservoirs and it is a good practice to prolong draw downs in reservoirs (Management Measures Eliminated from Further Consideration, comment 2) to help prevent shoreline erosion. As in streams, when the ground water flows into the reservoir, it can loosen and under cut the shoreline material thus increasing erosion and sediment rates , (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 11-1c).

17. The USACE should edit/rewrite the description for Recreation (pp 2-70-2-71).

(a) The recreation facilities should be presented on a map and designated as to their ownership, leased, flowage easements ( FDWCMAE, pp 2-6, Lines 5-11).

(b) The economics for recreation use should be analyzed and described in the EIS. The analysis should include visitor days (pp 8-2, FDMWMC, Table 8-1, pp 8-3, Lines 13-15). The visitor days and associated economics should be the total and the portions related to each impact zone (pp 2-70, Lines 8-44, pp 2-71, Lines 1-3). The results of the analysis should be part of the Description of the Proposed Action and Alternatives (40 CFR 1502.14).

(c) The USACE should disclose, by alternative, the environmental consequences on recreation economics (40 CFR 1502.16). This analyses will define the economic impact disclosed on pp 2-70, Lines 14-25, 34-44, and pp 2-71, Lines 1-3..

18. The USACE, to be in compliance with 40 CFR 1500.4, 40 CFR1502.2(b), 40 CFR 1508.3, should edit/rewrite the information presented in the EIS on pages pp 2-92 lines 20-32, through pp 2-104, Lines 1-29. This information is extraneous, not pertinent, and is very encyclopedic. The exceptions are on pp.2-96, Lines 38-40, pp 2-98, Lines 19-23, pp 2-100, Lines 25-30, if the one reservoir in the ACT is identified by name and location, pp 2-100, lines 32-39. Also include Richland Creek Reservoir and Etowah Reservoir (pp 2-110, Table 2.1-22 ) if different from those alluded to in previously cited pages in this comment. The effects of the proposed projects in the ACT and the raising of Lake Allatoona storage should be addressed in Environmental Consequences (40 CFR 1502.16) using the methods and approaches in 40 CFR 1502.22.

19. The USACE, to be in compliance with 40 CFR 1500.4, 40 CFR 1502.2(b), 40 CFR 1508.3; should edit/rewrite the information on pp 2-108, Lines 1-43, pp 2-109, Lines 1-4. This information is extraneous, not pertinent, and encyclopedic. The water conservation measures that the USACE is applying to help achieve its efficient water management per CR 1110-2-240 6d are pertinent and should be disclosed.

20. The USACE should edit/rewrite the information on pp 2-118 This information is incomplete. On pp 4-11, FDWCMAE, the Allatoona Creek arm is mentioned in regards to chlorophyll a but not on pp 2-118 of the EIS. This difference in fact and presentation between the DEIS and FDWCMAE substantiates General comment 2.

21. The USACE should edit/rewrite the information displayed on pp 2-123 and pp 2-126 to quantify the miles/acres of impaired waters and TMDL's. Table 2.1-26 is pertinent and useful information for the reader of the EIS and should be included in the discussion.

22. The USACE should edit/rewrite the following: **A)** pp 2-137, to clarify the period of record for the data and compare the data to State Water Quality Standards, **B)** clarify if the data that is collected by the USACE at River Side Park by the local Ranger (FDWCMAE, pp 5-5, Lines 17-20) is included. **C)** clarify the objectives for the monitoring (pp 2-137-2-142 and FDWMAE, pp 5-5, Lines 17-17-22), irrespective of who does the monitoring (ER 1110-2-8154, Water Quality and Environmental Management for Corps Civil Works Projects), and

**D)** how data is used by USACE in its operations of the ACT (ER 1110-2-8154, Water Quality and Environmental Management for Corps Civil Works Projects). The apparent omission of data in the EIS but included in the FDWCMAE substantiates General comment 2

23 The USACE should develop run off curve numbers for the ACT basin and present the results using maps and tables (Dunne, Thomas and Luna B. Leopold.1978. Water in Environmental Planning. W. H. Freeman Company, New York, pp 291-298. and Chow, Ven Te.1964. Handbook Of Applied Hydrology. McGraw-Hill Book Company, New York, pp21-27, 21-28,21-30, 21-34, 21-35, 21-36, 21-37.). The curve numbers are a percent of runoff from the land surface for annual, seasonal, and storm flows. Knowing seasonal and average runoff from land surface and storm flows are significant contributions towards the USACE efficient water management (ER 1110-2-240 6d, EM 1110-2-1420 Part 3, Reservoir Storage Requirements, 10-2e).

24. The USACE, to be in compliance with 40 CFR 1502.24, should account for sediment entering streams and rivers from overland flow. An accounting of sediment from overland sources is necessary if the USACE is to identify the effects of its operations on water quality (ER 1110-2-8154), channel maintenance flows, and efficient water management (ER 1110-2-240 6d). The ACT is not a “self contained” system (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-2a,b,d). One approach to help account for sediment is the establishment of permanent channel cross sections (Description Of Proposed Action and Alternatives comment 4).

25 pp 2-161, Lines 17-22. See comment #13, Affected Environment. Appears to be a typo regarding dam construction (Line 22).

26. The USACE should ensure which statements made in lines pp 2-167, Lines 20-26, 32-36 and those occurring in the FDWCMAE, pp 5-5, Lines 35-44 and pp 5-6, Lines 1-33. are factual and edit the DEIS and FDWCMAE accordingly. This difference in fact and presentation between the DEIS and FDWCMAE substantiates General Comment 2.

27. The USACE should ensure which statements regarding miles of shoreline (pp 2-175, Line 8) and in the FDWCMAE, pp E-A-3 is factual and the DEIS and FDWCMAE edited accordingly. This difference in fact between the DEIS and FDWCMAE substantiates General comment 2.

28. The USACE, to comply with 40 CFR 1502.24, should edit/rewrite the DEIS using the most current data that is available. The DEIS uses Census Data that is not the most current and other data and information that is up to 12 years old (pp 2-31, Lines 19-33, pp 2-242, Lines 34-42). The FDMCM and FDWCMAE use current data/information. The USACE should edit/rewrite the Affected Environment using the updated data and information in the FDMWCM and FDWCMAE. This difference in fact and presentation between the DEIS and FDMWCM, FDWCMAE substantiates General comment 2.



29. The USACE should edit/rewrite the DEIS M&I discussion on pp 2-233 Lines 4-22, pp 2-234, Table 2.6-5, pp 235, Table 2.6-6 to include the very good presentations for M&I in FDMWCM, pp 4-14, Lines 12-16, pp 4-15, Lines 1-2, Table 4-5 and FDWCMAE, pp 4-19, Lines 15-27, pp 4-20, Table 4-18. The very good presentation in the FDMWCM, FDWCMAE substantiates General Comment 1.

30 DEIS pp 2-241, 2.6.1.5 Flood Risk Management. The USACE should describe: **A)** the time to and duration of peak flows, and quantity of water for the 500 year flood, average annual flood, the flood of record, floods of February, 1996, July, 1994, May, 2003, September, 2009 and if used, "Pattern Floods (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-4c) and, **B)** the return frequency for the average annual flood, the flood of record, floods of February, 1996, July, 1994, May, 2003, September, 2009, and, if used, "Pattern Floods" (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-4c) Much of this information is available (See FDMCM, FDWCMAE) in flood reports (ER 1110-2-240 13 h,i) or can be modeled using Unit Hydrographs (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-4e).

31. The USACE, to comply with 40 CFR 1502.5, 40 CFR 1508 and to assist in assessing flood risk management (ER 1110-2-240 6g); should impose the contour/elevation that the respective floods reached in the Flood Pool for Lake Allatoona (Previous comment #29) as a "birds eye" view for the entire Lake. The scale of this "birds eye" view should enable the reader to see the relationship of the various flood elevations to land ownership, facilities (private, leased, and operated by the USACE) and flood flowage easements..

32. The USACE should describe the return frequency, time to and duration of peak flows, and quantity of water, and if used, "Pattern Floods (EM 1110-2-1420, Part 3, Reservoir Storage Requirements, 10-4c) for flood storage as used in the DEIS. This storage is a major reason given for not considering other alternatives (Management Measures Eliminated from Further Consideration, comment 1(f)).

33 The USACE should edit/rewrite the economics for Agricultural Water Supply, (pp 2-241, Lines 3-16) using the economics for Agricultural Water Supply presented in FDMWCM, pp 4-14, Lines 4-10, Table 4-4, FDWCMAE, pp 4-19, Lines 4-12, Table 4-17. These tables are very good presentations for Agricultural Water Supply and associated economics. The effects of the alternatives on agricultural water supply and associated economics should be disclosed in the Environmental Consequences (40 CFR 1502.16). The difference between the DEIS and the FDMWCM, FDWCMAE regarding Agricultural Water Supply and associated economics substantiates General comment 2

34. The USACE should provide a historical perspective on stream sedimentation. Many of the channels in the ACT have/had stored sediment resulting in post European poor logging, farming, mining, and road building practices. A result of these poor practices was the sediment entering the streams being greater than the capability of stream flow to move and transport the sediment through the system. The result was stream channel aggradation or stored sediment in the channels. With improved logging, farming, mining and road building practices, runoff entering the streams is "hungry" for sediment and transports stored sediment as it seeks the original base line of the channel. The result is stream channel degradation. The sediment in the Little River and Etowah River embayments is probably from the stored sediment in the channels as well as from changes in land use and current "mismanagement" of lands in the Allatoona Lake basin. There are many good studies available that were conducted on Alcovy Creek, in

Gwinnett County, Georgia that provide an excellent understanding of land use practices and stored sediment in the streams. Establishing permanent channel cross sections can help determine if channel aggregation or degradation is occurring (Description of Proposed Actions and Alternatives, comment 4).

## **GLOSSARY**

The Glossary for the DEIS has terms that are incorrectly defined and/or need to be added: The USACE should edit the DEIS, FDMWCM and FDWCMMAE to correct the terminology and definitions and ensure their use is per their definitions.

(a) “Channel forming discharge” is incorrect terminology and definition. Bank Full Stage/Flow is the correct terminology and, by definition, it is the channel forming flow and is commonly referred to as the flood flow having a return frequency of 1.5 years. Therefore the current definition in the Glossary is incorrect when it defines Bank Full as 1.5 years or greater” (Leopold, Luna B.1994. A View of the River. Harvard University Press, Cambridge, Massachusetts, London, England pp 90, and Dunne, Thomas and Luna B. Leopold.1978. Water in Environmental Planning. W. H. Freeman Company, New York, pp 608-622).

(b) “Channel Capacity” should be defined in the Glossary. Usually channel capacity is associated with Bank Full Flow. Bank Full flow is usually less than the total depth of entrenched stream channels.

(c) “Bank Full Capacity” needs to be defined and the USACE should edit the DEIS, FDMWCM, and FDWCMMAE to ensure its use is per its definition.

(d) Add “Shoreline” and define per Webster: “the line where a body of water and the shore meet”.

## **ENVIRONMENTAL CONSEQUENCES**

1. The USACE should edit/rewrite the disclosure of Environmental Consequences to conform with the requirements in PL 91-190, Section 102 (2)(C)(i)(ii),(iv),(v) and 40 CFR 1502.16.
2. The USACE should rewrite the Environmental Consequences to address the consequences by alternative, on the environment in Exhibit 2 in addition to that described in Affected Environment. The rewrite should include Environmental Consequences identified in previous and following sections of my comments. The consequences in Exhibit 2, need to be described in the Affected Environment, Description of Preferred Action and Alternatives.

## **EXHIBIT 2: ENVIRONMENTAL CONSEQUENCES THAT SHOULD BE ADDRESSED**

Water Quantity  
Flood Storage

Flood Risk Management  
Dissolved Oxygen

Shoreline Erosion  
Water Temperature

EXHIBIT 2: ENVIRONMENTAL CONSEQUENCES THAT SHOULD BE ADDRESSED

(Con't.)

Evaporation	Lake Stratification	Chlorophyll a
Nutrients	Fecal Coliform	Flood Damage
Sediment	Biodiversity (Coosa River)	Protected Species
Mosquito Control	Hazardous Material Mg't.	Hydrocarbons
Storm Water Runoff	Solid waste Management	

3. The USACE, to comply with 40 CFR 1502.24 should use the entire period of record for modeling Environmental Consequences for lake levels (pp 6-1, Line 38, pp 6-8, Line 14, pp 6-9, Lines 5,11,14, pp 6-10, Line 7, pp 6-11, Lines 6,9,10, pp 6-12, Lines 4,16, pp 6-13, Lines 13,27,37), (Affected Environment, Comment #13). There are at least four more years of record available since 2008. The flood of September 2009, a significant event for Lake Levels, is included when the entire period of record is used.
4. pp 6-2, Lines 25-27, are another indication that the USACE should consider alternatives in addition to the current four.
5. pp 6-10, Figure 6.1-4, pp 6-11, Figure 6.1-5. The duration curves on these Figures are very informative. Figure 6.1-4 is another indication that the USACE should consider alternatives in addition to the current four.
6. pp 6-77, NPS loads, Lines 23-26. The USACE should include in the modeling of the Non Point Source (NPS) loads for the tributaries in the basin that flow into Lake Allatoona. This will help the USACE understand and disclose the cause and effects on sediment deposition in the Little River and Etowah River embayments, Fecal Coliform, Nutrients, Chlorophyll a, Lake Eutrophication and etc.
7. The USACE should reevaluate and correct the statement on pp 6-78, Lines 34-35 in light of sediment deposition in the Little River and Etowah River embayment areas, TMDL's, chlorophyll a, Fecal Coliform, shoreline erosion, and etc.
8. The USACE should identify mitigation measures for each alternative to address the apparent deterioration of water quality and the rate of lake eutrophication.
9. pp 6-79. The USACE should explain why water releases to maintain channels and to meet minimum flow requirements would not have the same effect on lowering water temperatures as releases for power production.
10. 6-119, Lines 3-6. The USACE should include appropriate mitigation and management measures in each alternative, other than No Action, to address deteriorating water quality.
11. USACE should demonstrate in the DEIS how its operation of the ACT has and/or is addressing water quality impairment that is caused by its operations or by other causes..

12. The USACE should cease assuming that deteriorating water quality conditions in its reservoirs are just a “background condition that management measures must function.” (pp6-119, Lines 3-6) The continued use of this assumption hinders the USACE ability to identify opportunities to improve water quality, and detracts from the USACE being viewed as good stewards of the resources it is charged to manage and to be good stewards.

## **OTHER COMMENTS**

### **DEIS**

1. The USACE should edit pp 5-4, Lines 10-12 to clarify that water released from Lake Allatoona is incidental for Navigation and not for the purpose of Navigation.

2. The USACE should edit/rewrite Lake Stratification in the DEIS with the writeup in FDWCM, pp. 4-11, Lines 36-42, pp 4-12, Lines 1-35. The difference between the respective writeup substantiates General comment 2. The effects of each alternative on Lake Stratification should be disclosed in Environmental Consequences.

### **FDWCMAE**

1. The USACE should edit/rewrite pp 4-2, Lines 20-26 to make it complete (Affected Environment, comment 33).

2. The USACE should edit/rewrite pp 4-5, Line 4, pp 4-7, Line 7,12 to disclose the return frequencies for these floods.

3. The USACE should use the very good presentation on pp 4-7, Lines 42-45, pp 4-9, Table 4-5, Figure 4-3 in the description of the Affected Environment in the DEIS. This description is more analytical and less encyclopedic than the current description in the DEIS. The difference between the DEIS and FDWCMAE substantiates General comment 2.

4 The USACE should edit/rewrite pp 4-10, Lines 1-10 to include the mitigation measures for water quality.

5.. The USACE should edit/rewrite the DEIS to include the very good writeup on population on pp 4-18, Lines 28-34, Table 4-16. This difference between the DEIS and FDWCMAE substantiates General comment 2.

6 The USACE should edit/rewrite the DEIS presentation on Agriculture using the very good presentation on pp 4-19, Lines 3-12, Table 4-17. This will permit a basis for comparison with other water uses such as recreation, power production, etc. The difference in describing agriculture in the DEIS and the FDWCMAE substantiates General comment 2.

7. The USACE should edit/rewrite DEIS and incorporate the very good presentation on pp 4-19, Lines 15-21, pp 4-20, Table 4-18.

8. The USACE should rewrite the DEIS Affected Environment to incorporate the very good writeup on sedimentation and shoreline erosion (pp 5-5, Lines 35-44, pp 5-6, lines 1-7). The Environmental Consequences, by alternative, on sedimentation and shoreline erosion should be disclosed. The difference between the DEIS and FDWCMAE substantiates General comment 2.

9. The USACE should edit/rewrite the Affected Environment and Environmental Consequences for mosquito control (pp 7-19, Lines 23-27). If the consequences are unknown then monitoring needs to be accomplished and in the interim can address per the procedures in in 40 CFR 1502.22. The omission of mosquito control in the DEIS but included in the FDWCMAE substantiates General comment 2.

10. The USACE should edit/rewrite the DEIS Affected Environment to incorporate the very good write up on historic floods (pp 8-2, Lines 18-21, 23-26, Table 8-2, pp 8-3, Lines 1-2, Table 8-3). The difference between the DEIS and FDWCMAE substantiates General comment 2.

11. The USACE should edit/rewrite the DEIS Affected Environment to incorporate the very good write up on pp 8-3, Lines 13-15. The difference between the DEIS and FDWCMAE substantiates General comment 2.

12 The USACE should edit/rewrite the DEIS Affected Environment and Environmental Consequences to address biodiversity (pp 8-5, Lines 10-13). This omission of biodiversity for the Coosa in the DEIS substantiates General comment 2.

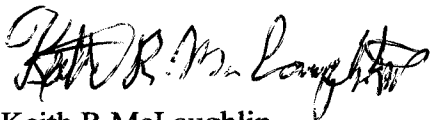
13. The USACE should add the Monitoring objectives in Appendix A of the FDWCMAE to comply with ER 110-2-8154.

#### FDMWCM

1. The USCA should edit/rewrite the DEIS Affected Environment by incorporating the very good write up on Agriculture (pp 4-14, Lines 12-16, pp 4-15, Lines 1-2, Table 4-5, pp 4-15, Lines 4-19, Table 4-6. This writeup is more complete, pertinent, and informative than in the DEIS. This difference substantiates General comment 2.

Sir, my comments are intended to assist the USACE to produce a product that meets the letter, spirit, and intent of NEPA, (P.L. 91-191), CEQ and USACE regulations.

Sincerely;



Keith R. McLaughlin  
Hydrologist, U.S. Forest Service (RET)

cc

Sean Nicholl, Lake Allatoona Association  
Sarah Skinner, Metropolitan North Georgia Water Planning District

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Kelly Stephens

**Affiliation:** Neely Henry Lake Association

### Contact Information

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Gadsden, AL 35901

**County:** Etowah

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### Comment Metadata

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**Comment Number:** 2013-0041

**Date:** 5/22/2013 9:24:19 PM

**Interest:**

**Resource Area:** Water Supply

**Attachments:**

### Comments:

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My name is Kelly Stephens and I am currently President of the Neely Henry Lake Association (NHLA). I submit the following comments on behalf of NHLA members. The NHLA is a non-profit organization that represents the interests of lakefront property owners and users of Neely Henry Lake on the Coosa River in Alabama. Our goal is to preserve, protect and improve the quality of life in and around Neely Henry Lake. We strive to improve safety and water quality by working together with local, state and federal agencies along with homeowners and all persons that use and appreciate our beautiful lake.

First, NHLA expresses concern regarding reduced water flows associated with the "Alternative Plan G (Proposed Action Alternative)" as described in lines 33-38 on page ES-41, and lines 18-21 on page ES-42 of the "ACT Draft EIS." Decreased water flows result in increased nutrient loading and decreased water quality. The resultant potential negative consequences for Neely Henry Lake include, but are not limited to, the following: 1) increased cost of water treatment and waste water treatment (many residents of the Neely Henry Lake area get their drinking water from the lake); 2) harm to fish and other aquatic life; 3) diminished property values; 4) diminished recreational value of the lake; 5) diminished ability of local communities to attract new businesses and residents; 6) negative impacts on local economies and tax revenues (Neely Henry Lake is the primary source of tourist revenue for the area); and 7) increased safety risks due to navigation hazards caused by lower lake levels. Currently authorized flow levels are necessary, under normal conditions, to maintain a sufficient quantity and quality of water in Neely Henry Lake.

NHLA is also concerned with negative consequences, as described above, likely to be resultant from the construction of proposed new reservoirs in the upper Coosa basin located in Georgia. Also troubling, is the possibility of increased interbasin transfer of water out of the upper Coosa basin to metro Atlanta.

## **Online Comments – 2013 ACT DEIS**

NHLA is opposed to any such projects that will result in a reduction of water flows to the Coosa River and Neely Henry Lake.

NHLA asks the Corps to reject any plan that proposes to reduce water flows in the Coosa River. Failure to do so will result in serious negative consequences for residents who live on or near Neely Henry Lake and the communities around the lake whose economies are inextricably tied to the it. Maintenance of adequate water flows is a challenging task, especially when drought conditions occur. Any reduction in normal water flows greatly increases the degree of difficulty.

Lastly, I would like to express the NHLA's appreciation for the Corps' support of making permanent for Neely Henry Lake a winter pool level of 507' above mean sea level. This has positive consequences for residents, businesses and communities in the Neely Henry Lake area.

Thank you for the opportunity to submit comments in this matter.

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** George Martin

**Affiliation:** Georgia Power

### Contact Information

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### Comment Metadata

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**Comment Number:** 2013-0042

**Date:** 5/28/2013 10:46:49 AM

**Interest:**

**Resource Area:** Water Quality

**Attachments:** GPC ACTWCMDIES 52813Comments.pdf

**Comments:**

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May 28, 2013  
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OR

Commander, U.S. Army Corps of Engineers, Mobile District  
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Mobile, AL 36628

**ALABAMA-COOSA-TALLAPOOSA BASIN, WATER CONTROL MANUAL  
UPDATE AND DRAFT ENVIRONMENTAL IMPACT STATEMENT**  
Comments Submitted by Georgia Power Company

Dear Sir or Madam:

Georgia Power is providing these comments regarding the Alabama-Coosa-Tallapoosa (ACT) River Basin Water Control Manual Update and Draft Environmental Impact Statement (DEIS). We appreciate the opportunity to comment and provide assistance in developing the scope of issues to be considered in the Corps of Engineer's (Corps) development of the updated Water Control Manual.

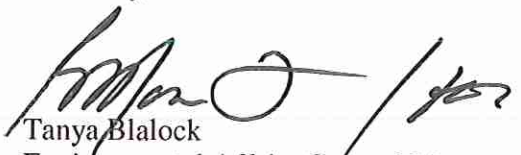
Georgia Power operates two generation facilities in the ACT River Basin, Plant Bowen and Plant Hammond. Plant Bowen is a coal fired generation plant with a nameplate rated output of 3,160 megawatts and Plant Hammond is coal fired generation plant with a nameplate rated output of 800 megawatts. Both Plant Bowen and Plant Hammond are critical components of the Georgia Power and Southern Company generation fleet which provides electricity to citizens throughout the Southeast. Accordingly, the Water Control Plan update and EIS should appropriately consider the water requirements to maintain long term operations at Plant Bowen and Plant Hammond as part of the update baseline conditions, in accordance with Council on Environmental Quality regulations at 40 C.F.R. Part 1500.

Based on the flow duration curve, for September, presented in the DEIS under the alternative proposed action (Plan G) there would be approximately three (3) days more every September when the flows would be less than 2,100 cfs at the Coosa River Rome gage (Mayo's Bar). A flow duration curve was not presented for August, but it could be expected that a similar impact of at least 3 days could be seen in August as well, based on the average annual discharges presented for the alternatives. This could mean that at least 3-6 additional days in the annual August-September timeframe GPC's Plant Hammond, downstream of Mayo's Bar, could experience higher river temperatures potentially affecting the plant's ability to provide electric service to the State of Georgia.

If Plan G is proposed for implementation as the preferred alternative, the Corps should first assure, through appropriate state agency and stakeholder coordination, that state water quality standards are not impaired and or degraded.

Thank you for this opportunity to comment. If we can provide additional information, please do not hesitate to contact me at (404) 506-7026 or [tdblaloc@southernco.com](mailto:tdblaloc@southernco.com).

Sincerely,



Tanya Blalock  
Environmental Affairs General Manager

## Online Comments – 2013 ACT DEIS

### Commenter Information

---

**Name:** Joyce Stanley

**Affiliation:** US Department of the Interior Office of Environmental Policy and Compliance

### Contact Information

---

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75 Spring Street, S.W.

Suite 1144

Atlanta, GA 30303

**County:** Georgia

**Phone:** 4043314524

**Email:** joyce\_stanley@ios.doi.gov

### Comment Metadata

---

**Comment Number:** 2013-0043

**Date:** 5/29/2013 10:40:32 AM

**Interest:**

**Resource Area:** National Environmental Policy Act

**Attachments:** Water Control Manual for Alabama Coosa Tallapoosa

### Comments:

---

Comments and Recommendations on the Draft Environmental Impact Statement (DEIS) for the Update of the Water Control Manual (WCM) for the Alabama-Coosa-Tallapoosa (ACT) River Basin in Georgia and Alabama (Attached)



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Richard B. Russell Federal Building  
75 Spring Street, S.W., Suite 1144  
Atlanta, Georgia 30303



ER 13/0125  
9043.1

May 29, 2013

Colonel Steven J. Roemhildt  
U.S. Army Corps of Engineers, Mobile District  
P.O. Box 2288  
Mobile, AL 36628-0001

Re: Comments and Recommendations on the Draft Environmental Impact Statement (DEIS) for the Update of the Water Control Manual (WCM) for the Alabama-Coosa-Tallapoosa (ACT) River Basin in Georgia and Alabama

Dear Colonel Roemhildt:

The United States Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Update of the Water Control Manual (WCM) for the Alabama-Coosa-Tallapoosa (ACT) River Basin in Georgia and Alabama. The DEIS has been prepared to fulfill the requirements of the National Environmental Policy Act of 1969 (NEPA), as amended (Title 42 of the U.S.C., Sections 4321-4347) for the WCM update.

## General Comments

We sent a Draft Fish and Wildlife Coordination Act (FWCA) Report to the Corps in December 2012. The document has been included as an appendix to the DEIS. In general, our comments on the DEIS are contained in the Draft FWCA Report. Key issues identified by the Department include conservation and recovery of natural flow variability, improved water quality parameters, connectivity to the floodplain, support for fish passage, enhancements for listed species and species of conservation need, monitoring programs to determine the effects of upstream dams, and implementation of an adaptive management approach. Maintenance activities that cause deviation from the WCM-specified flows may provide instream flow research opportunities that are needed for fish and wildlife management. We request that these activities be coordinated with the Department so that ephemeral data collection can be planned and executed.

In response to drought conditions in 2007, collaboration between the Department, Alabama Power Company (APC), and the Corps resulted in the Alabama Drought Response Operations

Proposal (ADROP). The Corps requested assistance from the Department to meet responsibilities under the FWCA for the update to the ACT WCM. The United States Fish and Wildlife Service Ecological field offices for Alabama and Georgia have coordinated to provide the Corps with the following comments (FWCA 48 Stat. 401, as amended; 16 U.S.C. § 661 *et seq.*; Endangered Species Act (Act), as amended (16 U.S.C. 1531-1543)).

Because of the limited scope of the proposed updates, neither the Corps' Proposed Action nor the No Action Alternative will address all of the Department's conservation concerns in the major rivers within the ACT Basin. These concerns include minimal mimicking of components of the natural flow regime, no reduction of effects of hydropower peaking flows, lack of improvement to water quality, lack of support for reintroductions and enhancements for listed species, and no recognition that fish passage at ACT dams is within the scope of the current effort.

The Department fully supports the ADROP and was an active participant in its development. We also support the suspension of navigation when in drought. The Department supports the ongoing efforts of the Corps in fish passage through locks and dams, but encourages additional studies at upstream facilities.

## **Specific Comments**

### Endangered Species Act Section 7 Consultation

It is our understanding that the Corps will initiate Section 7 Consultation after the DEIS public comment period is completed. Based on available information, the following species and critical habitat may be affected by the proposed action (e.g., water temperature, dissolved oxygen changes).

Alabama red-belly turtle (*Pseudemys alabamensis*) - Endangered  
Alabama sturgeon (*Scaphirhynchus suttkusi*) - Endangered  
Amber darter (*Percina antesella*) - Endangered  
Blue shiner (*Cyprinella caerulea*) - Threatened  
Coosa moccasinshell (*Medionidus parvulus*) - Endangered  
Cylindrical lioplax (*Lioplax cyclostomaformis*) - Endangered  
Etowah darter (*Etheostoma etowahae*) - Endangered  
Finelined pocketbook (*Hamiota altilis*) - Threatened  
Georgia pigtoe (*Pleurobema hanleyianum*) - Endangered  
Georgia rockcress (*Arabis georgiana*) - Candidate  
Goldline darter (*Percina aurolineata*) - Threatened  
Gulf sturgeon (*Acipenser oxyrinchus desotoi*) - Threatened  
Heavy pigtoe (*Pleurobema taitianum*) - Endangered  
Inflated heelsplitter (*Potamilus inflatus*) - Threatened  
Interrupted (=Georgia) rocksnail (*Leptoxis foremani*) - Endangered  
Lacy elimia (*Elimia crenatella*) - Threatened  
Mohr's Barbara's button (*Marshallia mohrii*) - Threatened  
Painted rocksnail (*Leptoxis taeniata*) - Threatened

Price's potato-bean (*Apios priceana*) - Threatened  
 Red cockaded woodpecker (*Picoides borealis*) - Endangered  
 Rough hornsnail (*Pleurocera foremani*) - Endangered  
 Southern clubshell (*Pleurobema decisum*) - Endangered  
 Triangular kidneyshell (*Ptychobranhus greenii*) - Endangered  
 Tulotoma snail (*Tulotoma magnifica*) - Threatened  
 Upland combshell (*Epioblasma metastriata*) - Endangered<sup>1</sup>  
 Wood stork (*Mycteria americana*) - Endangered

Critical habitat that occurs in the project area includes:

Alabama moccasinshell (*Medionidus acutissimus*) - Threatened  
 Alabama sturgeon (*Scaphirhynchus suttkusi*) - Endangered  
 Coosa moccasinshell (*Medionidus parvulus*) - Endangered  
 Finelined pocketbook (*Hamiota altilis*) - Threatened  
 Georgia pigtoe (*Pleurobema hanleyianum*) - Endangered  
 Interrupted (=Georgia) rocksnail (*Leptoxis foremani*) - Endangered  
 Orange-nacre mucket (*Hamiota perovalis*) - Threatened  
 Ovate clubshell (*Pleurobema perovatum*) - Endangered  
 Rough hornsnail (*Pleurocera foremani*) - Endangered  
 Southern acornshell (*Epioblasma othcaloogensis*) - Endangered<sup>2</sup>  
 Southern clubshell (*Pleurobema decisum*) - Endangered  
 Southern pigtoe (*Pleurobema georgianum*) - Endangered  
 Triangular kidneyshell (*Ptychobranhus greenii*) - Endangered  
 Upland combshell (*Epioblasma metastriata*) - Endangered<sup>2</sup>  
 Coosa moccasinshell (*Medionidus parvulus*) - Endangered

#### Future Reservoir-Construction

The DEIS provides a list of six additional water supply reservoirs (Table 2.1-22), two of which are in the Coosa Basin. The Department will be involved with any future reservoir construction via the Clean Water Act permitting process.

#### Southeastern Power Administration Consultation

Energy produced at Corps projects in the ACT Basin is marketed by the Southeastern Power Administration (SEPA). The Corps schedules and makes electric power available based on their agreement with SEPA. Because the scheduling of hydropower generation for SEPA contracts constitutes a federal action that has the potential to affect listed species protected under the Act, consultation regarding the scheduling of hydropower generation as per the SEPA contract should

<sup>1</sup> The upland combshell (*Epioblasma metastriata*) is likely extinct from the ACT Basin (pers. comm. Johnson and Garner 2012).

<sup>2</sup> The southern acornshell (*E. othcaloogensis*) and upland combshell (*E. metastriata*) are likely extinct from the ACT Basin (pers. Comm. Johnson and Garner 2012).

be discussed. We are presently unaware of a consultation related to the SEPA contract. It should be noted that the scheduling of hydropower per the SEPA contract is a federal action that is separate, but related to the federal action of the WCM Update.

#### Consideration of Non-hydropower Peaking Opportunities

The Corps references hydropower generation as an authorized project purpose (Table ES-2). The Corps considered but rejected scoping comments that “suggest significant revisions to hydropower operations.” However, the DEIS demonstrates that average annual hydropower generation is reduced in Plan D, Plan F, and Plan G (the Proposed Action Alternative) relative to the No Action Alternative (Figure 6.6-8). The Department provided comments to the Corps indicating that periods of non-hydropower peaking windows should be considered. We maintain that non-hydropower peaking windows may be long enough to be beneficial to fishes, but short enough to not cause significant adverse impacts to total hydropower generation.

Based on the information provided in the DEIS, the Department suspects that the cost of implementing non-hydropower peaking windows would be small in comparison to the cost incurred from adopting Plan D, Plan F, or Plan G. The Corps has not provided evidence that these recommendations would cause a significant impact to hydropower generation. In review of model output for the No Action and Proposed Action Alternative, average reservoir levels for Allatoona Lake fall below the Guide Curve during the summer and fall months (Figure 6. 1-3). Late spring or early summer non-hydropower peaking windows would likely enable Allatoona reservoir levels to meet the Guide Curve for a longer period of time. Such a modification would not only be beneficial to reservoir levels, but could also be interpreted as providing a “minor benefit” instead of a “minor adverse” environmental consequence to stream flow conditions in the Etowah River downstream of Allatoona Dam as listed in Table ES-5. A non-hydropeaking window need not necessarily occur in every year, month, or for entire months, and it does not mean that hydropower cannot be produced.

In conclusion, we recommend the Corps’ preferred alternative be revised to include a more natural flow regime, improve water quality parameters, provide enhancements for listed species and species of conservation need, and include monitoring programs and an adaptive management approach. We are particularly interested in working with the Corps to identify flexibilities related to flow management and hydropower production.

Thank you for the opportunity to comment on this project. If you have questions, I can be reached on (404) 331-4524 or via email at [joyce\\_stanley@ios.doi.gov](mailto:joyce_stanley@ios.doi.gov).

Sincerely,



Joyce Stanley, MPA  
Regional Environmental Protection Specialist

cc: Jerry Ziewitz – FWS

Gary Lecain - USGS  
Anita Barnett – NPS  
Tommy Broussard – BOEM  
Harry J. Payne – OSMRE  
OEPC – WASH



## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Kirk Day

**Affiliation:** Cherokee County Commission

### Contact Information

---

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Suite 103

Centre, AL 35960

**County:** Cherokee

**Phone:** 256-927-

**Email:** [kirkday@cherokeecounty-al.gov](mailto:kirkday@cherokeecounty-al.gov)

### Comment Metadata

---

**Comment Number:** 2013-0044

**Date:** 5/30/2013 4:05:10 PM

**Interest:**

**Resource Area:** Socioeconomics & Recreation, Water Management Recommendations, Water Quality

**Attachments:** ACT-WCM Comments from Cherokee Co Commission.doc

### Comments:

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Attached are comments from the Chairman of the Cherokee County Commission. They are in Word 2010 format. Please notify the sender at [kirkday@cherokeecounty-al.gov](mailto:kirkday@cherokeecounty-al.gov) if there is a problem in opening the document.

**CHEROKEE COUNTY COMMISSION**  
260 Cedar Bluff Road, Suite 103 · Centre, AL 35960  
Phone: 256-927-3668

May 30, 2013

Colonel Steven J. Roemhildt  
Mobile District, U.S. Army Corps of Engineers  
P.O. Box 2288  
Mobile, Alabama 36628-0001

Re: Water Control Manual for Alabama-Coosa-Tallapoosa Basin

Dear Colonel Roemhildt:

On behalf of the Cherokee County Commission, I would like to provide you with some input concerning the Water Control Manual for the Alabama-Coosa-Tallapoosa Basin. I appreciate you giving us the opportunity to tell you of our concerns. Weiss Lake is the engine which drives much of the economy in our county. Many businesses on and around Weiss Lake are dependent on the recreational and agricultural activities which the lake provides to our residents and visitors alike. Reduced flows and degraded water quality would have an impact on our economy and our ability to promote our county as a tourist destination.

Weiss Lake is a very nutrient rich lake and could almost be considered hyper eutrophic. Reduced outflows from Corps of Engineers projects upstream will cause the water quality to further degrade. The flow of water into the lake and the retention time of the water while in the lake have a proven effect on the water quality of Weiss Lake. Dr. David Bayne has documented this relationship in his study, *The Potential Impact of Water Reallocation on Retention and Chlorophyll in Weiss Lake, 2003*.

Lastly, the Water Control Manual for the ACT Basin did not consider the winter pool level increase requested by Alabama Power Company's (APC) relicense application. APC submitted the application in July of 2005 to FERC. In 2007, the Secretary of the Army directed that an update of the Master WCM for the ACT Basin be conducted. This update did not address the requested winter pool increase. Realizing the beneficial impact such an increase would have on real estate prices and recreational opportunities, the Cherokee County Commission respectfully ask that the Corps of Engineers reexamine APC's request.

Please feel free to contact me regarding any of these comments submitted on behalf of the commission. My personal e-mail is: [kirkday@cherokeecounty-al.gov](mailto:kirkday@cherokeecounty-al.gov). On a personal note, as a 1993 graduate of USMA, I would like to say to a fellow graduate, "Go Army! Beat Navy!"

Sincerely,

J. Kirk Day  
Probate Judge and County Commission Chairman  
Cherokee County, Alabama

## Online Comments – 2013 ACT DEIS

### Commenter Information

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**Name:** Jeffrey Durniak

**Affiliation:** Georgia Wildlife Resources Division

### Contact Information

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2150 Dawsonville Highway

Gainesville, GA 30501

**County:** Hall

**Phone:** 770-535-5498

**Email:** jeff.durniak@dnr.state.ga.us

### Comment Metadata

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**Comment Number:** 2013-0045

**Date:** 5/29/2013 1:37:11 PM

**Interest:**

**Resource Area:** Biological Resources, Socioeconomics & Recreation, Water Quality

**Attachments:** COE ACT DraftEIS signed comments by FM 5-29-13.pdf

### Comments:

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Please see the attached comments from the Fisheries Section of the Georgia Wildlife Resources Division.



MARK WILLIAMS  
COMMISSIONER

DAN FORSTER  
DIRECTOR

May 29, 2013

Commander  
U.S. Army Corps of Engineers  
Mobile District,  
Attn: PD-EI (ACT-DEIS)  
P.O. Box 2288  
Mobile, AL 36628

**SUBJECT:** Alabama-Coosa-Tallapoosa River Basin Water Control Manual Update

Thank you for the opportunity to provide comments regarding the Draft Environmental Impact Statement (DEIS) for updates to the Alabama-Coosa-Tallapoosa River Basin (ACT) Water Control Master Manual. The Georgia Wildlife Resources Division (WRD), Fisheries Management Section, offers the following comments for your consideration:

#### Lake Allatoona

The U.S. Army Corps of Engineers (USACE) currently works to manage spring reservoir water levels for fish spawning for four to six weeks within an eight-week window annually between March 15 and May 15. Under the Preferred Action Alternative (Plan G), fish spawn operations would continue at Lake Allatoona and we look forward to continued coordination with the USACE during fish spawn operations.

Proposed operational changes under Plan G would revise the existing guide curve at Lake Allatoona by implementing a phased-fall drawdown period between early September and December (DEIS, Figure ES-6). This is anticipated to result in "notably" higher lake levels through the fall and early winter period relative to current operations (No-action alternative). We agree that these higher lake levels will benefit boaters and anglers by improving boat ramp access during the period.

#### Etowah River Tailwater

The Etowah River Tailwater (ERT) from Allatoona Dam downstream to the City of Rome provides considerable recreational fishing opportunities for black bass, catfish, and striped bass. The upper Coosa River Basin striped bass population (to include the Etowah River) is a popular sport fishery and is unique in that it is one of only a handful of land-locked, naturally reproducing populations in the Southeast. This robust population is also important as it serves as the primary brood fish source for the WRD's statewide striped bass production program.

Adult striped bass have an obligate need for cool water and seek out cool water refuge during the hot summer months. Currently, the ERT provides such a refuge due to the cool water released from Allatoona Dam and large numbers of striped bass migrate to and reside within the ERT throughout the summer and early fall months each year. This thermal refuge is important to the overall health of the upper Coosa River Basin striped bass population; therefore, maintenance of the thermal regime of the ERT during the summer months is of great interest to WRD and the angling public.

Overall, the proposed operational updates under the Preferred Action Alternative (Plan G) to the Allatoona Water Control Plan (Appendix A) should maintain the historic satisfactory cool water refuge for striped bass in the ERT. However, in Section 7-05 b 1) *Instructions for Spillway Gates and Sluices Operation*, the USACE states an operational preference for surface water releases from Lake Allatoona through the spillway gates when the reservoir elevation is higher than 835 ft. above MSL and additional water release is required above that provided by the two power units and the house unit. Surface temperatures in Lake Allatoona range from 27-30°C between June and early October annually. A surface water release from Allatoona Dam through the spillway gates during this time frame could adversely affect striped bass residing in the ERT. As such, we suggest the USACE consider using the sluice gates ((7-05 b 2) *Instructions for Spillway Gates and Sluices Operation*) as an option for water release when additional water releases are needed between June and early October. Since the sluice gates would be releasing hypolimnetic water from Lake Allatoona, the water temperatures would be cooler than the surface water released from the spillway gates.

We appreciate the opportunity to provide comments during this important process. If we can be of further assistance, please contact Senior Fisheries Biologist Jim Hakala at 706-624-1161 or via e-mail [jim.hakala@dnr.state.ga.us](mailto:jim.hakala@dnr.state.ga.us).

Sincerely,  
  
John Biagi  
Chief of Fisheries

cc: Jeff Durniak

**From:** [Mark Colson](#)  
**To:** [ACT-WCM](#)  
**Cc:** [Anita Archie](#); "[Brian Atkins@adeca.alabama.gov](mailto:Brian.Atkins@adeca.alabama.gov)"; "[lfleur@adem.state.al.us](mailto:lfleur@adem.state.al.us)"  
**Subject:** 20130531 - BCA Comment on ACT DEIS  
**Date:** Friday, May 31, 2013 2:28:01 PM  
**Attachments:** [image001.gif](#)  
[20130531 - Draft BCA Comment on ACT DEIS.pdf](#)

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Please find the attached comment letter from the Business Council of Alabama regarding the "Draft Environmental Impact Statement Update of the Alabama-Coosa-Tallaspossa River Basin Water Control Manual."

If you have any questions, please contact BCA Senior Vice President for Intergovernmental Affairs Anita Archie at [anita@bcatoday.org](mailto:anita@bcatoday.org) or 334-240-8775.

Respectfully submitted,

**Mark M. Colson**

*Chief of Staff &  
Executive Director of ProgressPAC*

-----  
**Direct:** 334-240-8724  
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BUSINESS COUNCIL  
OF ALABAMA

May 31, 2013

**VIA U.S. Mail & E-Mail**

Colonel Steven J. Roemhildt  
U.S. Army Corps of Engineers  
Mobile District  
Attention: PD-EI (ACT-DEIS)  
P.O. Box 2288  
Mobile, AL 36628  
[act-wcm@usace.army.mil](mailto:act-wcm@usace.army.mil)

**Re: Draft Environmental Impact Statement  
Update of the Alabama-Coosa-Tallapoosa River Basin Water Control Manual**

Dear Colonel Roemhildt:

The Business Council of Alabama (BCA) appreciates this opportunity to submit comments on the above referenced Draft Environmental Impact Statement (DEIS). The Business Council of Alabama is Alabama's foremost voice for business. The BCA is a non-partisan statewide business association representing the interests and concerns of nearly one million working Alabamians through its member companies and its partnership with the Chamber of Commerce Association of Alabama. BCA is Alabama's exclusive affiliate to the U.S. Chamber of Commerce and the National Association of Manufacturers.

BCA's members are directly affected by water management decisions implemented by the Corps of Engineers. These members depend on adequate water resources and will be impacted if the Corps operations trigger drought conditions more often and if the Corps operations diminish water quality.

The Corps response to the lower flows during drought conditions under the proposed alternative is that "[w]ater management activities may affect water quality under low flow conditions such that the state regulatory agencies may consider reevaluation of NPDES permits to confirm the system's assimilative capacity." (DEIS p. 6-112, and DEIS Executive Summary p. ES-48). However, the USACOE does not include this consideration as a part of their evaluation of the proposed alternative and does not include the potential costs to NPDES permit holders of complying with new restrictive permit limitations.

Under the discussion of Mitigation the Corps states:

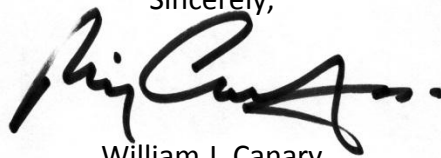
“Reevaluation of wasteload allocations from point sources in the upper Coosa River and Alabama River may be appropriate to ensure that current discharge permits do not violate water quality standards when in-stream flow changes from the No Action Alternative. Georgia EPD and ADEM base discharge permits on 7Q10 conditions; the system’s 7-day minimum flow from the previous 10-year period. In some permits, restrictions are placed on discharges during low-flow conditions. Georgia EPD and ADEM may determine that it would be appropriate to reevaluate stream flows in the upper Coosa River and Alabama River to ensure that NPDES permitted facilities do not violate water quality standards under extreme low-flow conditions. Some current NPDES permits limit or restrict discharges during low-flow conditions similar to what occurred in 2007. The water quality model developed during this EIS made assumptions regarding point source discharges that might not apply during low-flow conditions. The states may elect to update NPDES permits to limit discharges during certain in-stream flow conditions.” (DEIS p. 6-196, and DEIS Executive Summary p. ES-70).

This reevaluation of 7Q10 flows is clearly within the responsibility of the USACOE as a part of their evaluation of the alternatives under NEPA. (40 CFR Part 1502.23). The cost of this evaluation should not be placed on the State of Alabama and the cost of any subsequent changes in NPDES permits must be considered as a part of the alternatives analysis.

It is inappropriate for the Corps to not fully consider the impacts of its proposed action and to simply place the burden of diminished water quality on current and future NPDES permit holders.

Thank you for the opportunity to provide these comments. Please do not hesitate to contact us if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Canary", with a stylized flourish at the end.

William J. Canary  
*President and CEO*

Business Council of Alabama

cc:

Alabama Office of Water Resources - [Brian.Atkins@adeca.alabama.gov](mailto:Brian.Atkins@adeca.alabama.gov)

Alabama Department of Environmental Management - [llefleur@adem.state.al.us](mailto:llefleur@adem.state.al.us)



**From:** [Cook, Stan](#)  
**To:** [ACT-WCM](#)  
**Subject:** ACT Control Manual Comments  
**Date:** Thursday, May 30, 2013 3:59:29 PM  
**Attachments:** [image001.gif](#)  
[CommentsWaterControlManualALCoosaTallapoosa20130530.pdf](#)

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Dear Sir:

Attached are comments respectfully submitted by Alabama Department of Conservation and Natural Resources concerning the proposed Control Manual for the ACT. We will also mail in a set of comments. Thank you for the opportunity to express our position.

Sincerely

Stan Cook

Chief of Fisheries

Jim Folsom Building

64 North Union St

Suite 551

Montgomery, AL 36043



STATE OF ALABAMA  
**DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES**  
**WILDLIFE AND FRESHWATER FISHERIES DIVISION**



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**ROBERT BENTLEY**  
GOVERNOR

**N. GUNTER GUY, JR.**  
COMMISSIONER

**CURTIS JONES**  
DEPUTY COMMISSIONER

*The mission of the Wildlife and Freshwater Fisheries Division is to manage, protect, conserve, and enhance the wildlife and aquatic resources of Alabama for the sustainable benefit of the people of Alabama.*

**CHARLES F. "CHUCK" SYKES**  
DIRECTOR

**FRED R. HARDERS**  
ASST. DIRECTOR

May 23, 2013

Colonel Steven J. Roemhildt  
Mobile District, U.S. Army Corps of Engineers  
P.O. Box 2288  
Mobile, Alabama 36628-0001

RE: Comments on the Water Control Manual for Alabama-Coosa-Tallapoosa Basin

Dear Colonel Roemhildt:

The Fisheries Section of Alabama's Department of Conservation and Natural Resources (ADCNR) submitted comments to the Alabama-Coosa-Tallapoosa (ACT) River Basin Water Control Manual Update Process on October 17, 2008 regarding project releases, recreation, fish passage, water quality and Alabama's Comprehensive Wildlife Conservation Strategy. Upon reviewing the Draft Environmental Impact Statement (DEIS) to adopt an updated Master Water Control Manual for the ACT, we believe the U.S. Army Corps of Engineers (USACE) has failed to adequately address comments and recommendations for the protection and enhancement of aquatic wildlife resources for the people of Alabama. Therefore, we would like to reaffirm our previous comments in our letter dated October 17, 2008 and provide these additional comments:

- In our opinion the DEIS does not adequately address our concerns over the use of 7Q10 as a target flow for project releases. ADCNR holds in trust the wildlife resources for the people of Alabama. Natural flow regimes in a stream or river channel adequately supports the full suite of ecological functions (biodiversity, channel maintenance, floodplain operation) through factors such as timing (seasonal), frequency (how often), magnitude (size of water events), rate of change (how quickly is water delivered), and duration (how long do the events last) to ensure complete ecosystem functionality. Deviations from the natural flow regime of rivers and streams affect their physical, chemical, and biological functions. Whether there is a significant impact to ecological integrity depends on the magnitude of deviation. A 7Q10 flow is not an instream flow standard that will protect aquatic wildlife nor will it meet hydrologic needs of a functioning flowing system. This low flow may protect against exceeding pollution thresholds, but fails to adequately protect aquatic wildlife. Target flows for project releases should ensure that sufficient quality and quantity of water is provided that resembles the natural flow regime. A 7Q10 flow regime will hinder ADCNR's ability to manage, protect, conserve, and enhance the trust resources of Alabama. Water scientists

and aquatic biologists generally agree that natural stream flow with all of its variations through seasonal flood events, low flows in summer, and high flows in late winter and spring (inter and intra-annual natural flow variability) is a significant controlling variable in nature helping to recharge groundwater aquifers, create and maintain aquatic habitat, support fish and wildlife populations, and maintain acceptable water-quality conditions (Instream Flow Council, 2004).

ADCNR implemented an Instream Flow Policy in 2012 which explains our position on flow standards. The following are excerpts from that policy.

*Instream flows are incorrectly thought of as minimum flows by many. Minimum flows are just that, minimal, and do not fully protect stream functions. The whole concept of a minimum flow has led to many rivers and streams becoming depleted and damaged with respect to their hydrological and ecosystem function. Minimum flows actually become maximum flows in highly used and altered systems since managed flows are rarely allowed to exceed this "minimum" limit. "Conservation Flow" is defined as the minimum continuous water flow requirement as determined by DCNR that is necessary to maintain the biological, physical, and chemical integrity of a waterway using generally accepted scientific methodologies. Conservation flow for regulated waterways shall be as follows: 1) for waterways regulated for hydropower production the requirement shall be determined through the Federal Energy Regulatory Commission licensing process; 2) for waterways regulated for other purposes (such as drinking water impoundments) the recommended seasonal requirement is 30% of Mean Annual Flow (MAF) for July through November, 60% MAF for January through April, and 40% MAF for May, June, and December or will be based on an accepted instream flow methodology such as the Instream Flow Incremental Methodology (IFIM). Conservation flow for unregulated waterways shall be 30% MAF or will be based on an accepted instream flow methodology such as the Instream Flow Incremental Methodology (IFIM).*

*"Subsistence Flow" is the minimum water flow requirement as determined by DCNR that must remain in a waterway in order to avoid serious or long term adverse effects on the biological integrity of the waterway. Subsistence flow shall be determined as follows: 1) for waterways regulated for hydropower production the requirement shall be determined through the Federal Energy Regulatory Commission licensing process; 2) for waterways regulated for other purposes (such as drinking water impoundments) and for unregulated waterways the requirement is 10% of Mean Annual Flow (MAF) or will be based on an accepted instream flow methodology such as the Instream Flow Incremental Methodology (IFIM).*

*It is the policy of the DCNR to advocate for the protection of the Instream Flow requirements in all water allocation decisions.*

The USACE's operations does not require approval of the Federal Energy Regulatory Commission. However, the responsibility of the USACE's water control operations must

include a flow regime that maintains ecological integrity in order to protect the physical, chemical, and biological functions from waters flowing into the State of Alabama and through the Mobile Delta.

- The DEIS does not address current and proposed project operational impacts to backwater areas which serve as valuable nursery habitat for aquatic wildlife as well as prime fishing areas. Access to these backwater areas for recreational boaters are being impeded or lost due to sediment deposition changes related to project operations. The USACE's neglect of small boat channel maintenance has also caused questions to be raised concerning riparian ownership issues.
- The proposed action alternative (Plan G) allows for higher average lake levels at Allatoona Lake by implementing a fall stepped down guide curve. The implementation of the new guide appears to be mainly for the purposes of increasing recreational access at the lake to the detriment of recreational access at Weiss Lake and possibly other public water in the ACT. Therefore, ADCNR is concerned that there will be recreational impacts in Alabama due to the increased storage at Allatoona Lake during fall and winter months. It appears that Alabama recreational opportunities were not given equal consideration. We request the USACE evaluate impacts to recreation at Weiss Lake and other downstream bodies of water, particularly during drought scenarios where recreational access may be severely limited.
- Alabama sturgeon, *Scaphirhynchus suttkusi*, has been impacted by the loss and fragmentation of habitat as a result of project operations (dam construction, flow alteration/regulation, and channel maintenance). The only capture of Alabama sturgeon in the past decade in the Claiborne Lock and Dam tailrace underscores the fact that project operations are contributing to the extinction of this species. Riverine flow regimes that mimic flows prior to USACE's construction of lock and dams on the Alabama River can certainly be used to set flow standards that are protective of Alabama sturgeon's life history needs. Connectivity to riverine habitats above Claiborne Lock and Dam would also assist in meeting Alabama sturgeon life history needs. See the following comments.
- A fish passage plan for all USACE locks and dams in the ACT should be developed. We recognize the USACE's effort to continue seasonal operations of locks for fish passage at Claiborne Lock and Dam and at Millers Ferry Lock and Dam. However, fish passage lockages should be conducted at R.F. Henry Lock and Dam. While this method of fish passage has had success, it does not appear to be successful for all riverine species that need to move. Additional types of fish passage strategies should be evaluated for their application as part of a fish passage plan for the Alabama River.

Letter to Colonel Steven Roemhildt

Page 4

May 23, 2013

- The DEIS incorrectly states that smallmouth bass occur in USACE reservoirs located in Alabama. Black bass species that are known to occur in these reservoirs are largemouth bass, *Micropterus salmoides*, and Alabama bass, *Micropterus henshalli*.
- Page 2-219. Table 2.511. The Alabama pearlshell, *Margaritifera marrianae*, is a state-protected species and should be documented as such in this table.

References

Annear, T., I. Chisholm, H. Beecher, A. Locke, P. Aarrestad, C. Coomer, C. Estes, J. Hunt, R. Jacobson, G. Jobsis, J. Kauffman, J. Marshall, K. Mayes, G. Smith, R. Wentworth, and C. Stalnaker. 2004. Instream Flows for Riverine Resource Stewardship - Revised Edition. Instream Flow Council, Cheyenne, WY.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Gunter Guy, Jr.', with a stylized flourish at the end.

N. Gunter Guy, Jr.  
Commissioner

**From:** [Jerry Sailors](#)  
**To:** [ACT-WCM](#)  
**Subject:** CARIA Comments on Draft EIS and WCM  
**Date:** Friday, May 31, 2013 11:46:03 AM  
**Attachments:** [image001.jpg](#)  
[CARIA Comments 05.31.2013.pdf](#)

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Attached are comments of the Coosa-Alabama River Improvement Association on the Draft Environmental Impact Statement and Water Control Manual for the Alabama-Coosa-Tallapoosa River Basin.

Jerry's signature



Jerry L Sailors  
President, CARIA  
(334)265-5744  
(334)324-6134 (cell)





## COOSA-ALABAMA RIVER IMPROVEMENT ASSOCIATION, INC.

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### OFFICERS

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### ADMINISTRATION

Jerry L. Sailors  
President

May 31, 2013

VIA EMAIL TO: [act-wcm@usace.army.mil](mailto:act-wcm@usace.army.mil)

Colonel Steven J. Roemhildt  
Commander, Mobile District  
U.S. Army Corps of Engineers  
ATTN: PD-EI (ACT-DEIS)  
Post Office Box 2288  
Mobile, Alabama 36628

Re: Comments on the Draft Environmental Impact Statement (DEIS)  
for the Revised Water Control Manual (WCM) for the Alabama-  
Coosa-Tallapoosa (ACT) River Basin

Dear Colonel Roemhildt:

The Coosa-Alabama River Improvement Association (CARIA) was formed in 1890 by businessmen in Gadsden, Alabama for the purpose of promoting river transportation on the Coosa and Alabama Rivers. CARIA members include cities, counties, businesses, and individuals from Rome to Mobile that have an interest in maintaining and improving the multiple-use benefits of those rivers. Our mission is to improve and market the Coosa, Alabama, and Tallapoosa Rivers through education, promotion, and public advocacy.

Over the years we have focused primarily on navigation as an authorized use of federal infrastructure within the Basin, but we have a vested interest in all the uses that infrastructure serves. As demonstrated by recent droughts, balancing navigation, hydropower, recreation, flood control, water supply, water quality, and fish and wildlife enhancement is a difficult, but essential task. So CARIA fully supports the efforts of the US Army Corps of Engineers (Corps) to operate federal facilities in the ACT basin in the most efficient and effective way.

In general, CARIA views the entire ACT Basin as an economic and environmental resource providing incalculable benefits to the southeast region of the country. A major component of those benefits is the Alabama River navigation channel. Maintaining that channel in an operational status has several economic benefits for the region:

1. The availability of barges as an alternate mode of transportation dampens road and rail rates for shippers;
2. Barges provide exceptional benefits of capacity, efficiency, and safety that contribute to the nation's transportation capability;
3. Maintaining navigation channel facilities greatly benefits recreational boat traffic;
4. Putting cargo onto barges reduces highway congestion and maintenance costs;
5. Waterways have room to absorb additional cargo without significant additional investment costs.

Despite its current low level of barge activity, the Alabama River navigation channel is an economic asset and a tool to create jobs and benefits for the state, particularly central Alabama and the Black Belt region. Growth in barge activity is possible and would be a much-needed economic boon to the state, including some of its most economically challenged areas. CARIA continues to receive regular inquiries from parties interested in siting on a navigable waterway, but they typically lose interest when informed of the Corps' inability to provide navigable conditions on a regular or predictable basis. The WCM and DEIS should do more to recognize and support the potential of the river from Montgomery to Mobile Bay and encourage the economic activity that commercial navigation would generate.

Overall, CARIA supports any of the proposed alternatives that provide more definitive criteria of navigation depths and more positive benefits as depicted in the modeled flows below Claiborne Dam. Also appreciated is the inclusion of a drought management plan with defined actions. There are, however, several areas that need to be clarified.

The Corps should clarify its authority to maintain the channel.

Language describing the scope of the DEIS relative to congressional authority pertaining to navigation is misleading:

- Page ES-2, lines 13-14: "This EIS considers only operational changes within existing congressional authorities and does not consider operational changes that would require additional authority."
- Page ES-10, lines 39-40 and page ES-11, lines 1-2: "Navigation is one of the congressionally authorized purposes in the ACT Basin; however, recommendations to ... construct additional training works in the Alabama



River, or maintain tributaries to the Alabama River exceed existing congressional authority for navigation in the system and were not considered.”

These statements suggest that the Corps lacks statutory authority to carry out minor improvements that would assist in keeping the channel clear. That is not our understanding. In any event, flow and channel maintenance are inextricably connected concepts when providing for navigation. As the Corps reviews its plans to support commercial navigation, we urge you not to separate these two interrelated factors.

Congress has authorized the Corps to maintain the Alabama River navigation channel, which extends from the mouth of the river 305 river miles to a point approximately 17 miles above Montgomery at the confluence of the Coosa and Tallapoosa Rivers. The channel itself consists of channel cutoffs, dams with locks, and training works. Throughout the DEIS and WCM are references to maintaining that channel through flow management, dredging, and training works.

Training works then are part of the authorized channel infrastructure and should be acknowledged as an ongoing operational requirement in the DEIS and WCM. As with dredging, modifying those training works should require justifying funding only, not additional authorization. To the extent the Corps’ statements reflect a view that the Corps lacks standing statutory authority (apart from the question of year-to-year funding), we urge the Corps to clarify its view as to the extent and nature of its authority to build small works, such as training weirs, for the sake of channel availability.

The Corps should clear tributary openings to boost flows.

Currently, the Corps and Alabama Power Company (APC) coordinate water flows supporting navigation in the Alabama River. Given the current state of channel maintenance, the agreed-upon daily average minimum flow of 4640 cfs does not provide full-depth navigation or maintenance at the 7Q10 flow of 6,600 cfs below Claiborne. Intervening flows from Alabama River tributaries and drawdown of RF Henry and Millers Ferry reservoirs must be used. The minimal storage capacity of the Henry and Millers Ferry reservoirs limits capability to provide the flows required. It is imperative, therefore, intervening flows from tributaries, such as Catoma Creek and the Cahaba River, be fully utilized to maximize the chances of attaining sufficient navigation flows at Claiborne, which means we must not allow those tributaries to silt in or be blocked.

As the Corps notes, “Releases by APC together with local inflows downstream of the Coosa and Tallapoosa Rivers’ confluence are expected to provide the required flow in the Alabama River downstream of the Claiborne Lock and Dam.” (DEIS, p. 4-6, ll. 27-29)

The Corps also observed in the June 2009 Mobile District report, *Environmental Assessment for Small Boat Access Channels in the Alabama River, Alabama*, as follows: “Operation and maintenance of the Alabama-Coosa River system (ACR) and its tributaries provides for development of navigation, flood control, power, and recreation”



and “is authorized by Public Law 14, 79<sup>th</sup> Congress, in accordance with the River and Harbor Act on 1899, on 2 March 1945.” (Emphasis added.)

The Corps, then, is authorized to maintain those tributaries that contribute to navigation flows by removing sediment blocking the mouth of those tributaries. Maintenance of the tributaries then should be acknowledged as an ongoing operational requirement in the DEIS and WCM. Any suggestion otherwise in an official document such as the WCM or EIS is detrimental to public and private efforts to promote the Alabama River navigation channel as an economic asset.

The Corps has proposed a *de facto* reordering of project purposes at the expense of navigation.

The WCM purports to not prioritize the multiple uses in managing federal reservoirs, but the preferred alternative does exactly that by raising and extending the “plateau” of the rule curves at Allatoona and Carters in the dry months of the late summer and fall, when it is needed most downstream. We find this particularly difficult to understand given that navigation was among the original purposes for which the reservoirs were constructed, and downstream interests have acted in reliance on those flows being there.

Likewise, the Corps’ Drought Management Plan (DEIS pp ES 12-13 and p 4-14, WCM p E-C-22) also exposes navigation to abandonment for the sake of other purposes at the most critical times in that the downstream navigation flow target at Montgomery is the first to be reduced under any declared drought condition. However, as demonstrated during the drought years of 2007 and 2008, attempts to maintain the 4640 cfs releases from the Coosa and Tallapoosa projects can endanger the entire ACT system. Cutback in releases at that time, given the minimal impact on the low level of navigation downstream, was fully justifiable and underscored the need for a well-designed drought management plan that minimizes the effect low flow conditions can have on all river-supported purposes. The WCM (p 7-1, lines 26-27) reiterates the Corps’ responsibility to “ensure adequate water control regulation to support navigation on the Alabama River.” Navigation flows also support other downstream needs, such as water quality and wastewater assimilation. So when describing actions taken to address drought conditions, both the WCM and DEIS should then acknowledge that any decision to reduce “navigation” flows should be made with due consideration of economic as well as environmental impacts on downstream requirements.

Thank you for your consideration of these comments. Please feel free to contact me if I may provide additional information.

Sincerely,



Jerry L. Sailors  
President

**From:** [marciefosterforcherokeecounty@gmail.com](mailto:marciefosterforcherokeecounty@gmail.com) on behalf of [Marcie Foster](#)  
**To:** [ACT-WCM](#)  
**Subject:** DEIS Weiss Lake Comments  
**Date:** Monday, April 01, 2013 3:23:38 PM

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Good afternoon,

My name is Marcie Foster and I am the Cherokee County Commissioner for District 3. A portion of my District includes or is attached to Weiss Lake. Weiss Lake is one of the economic engines for this county, providing a significant amount of revenue to the businesses and county in recreation type activities. At this time Alabama Power drops the lake level for 4 to 6 months of the year. This has a devastating effect on the local economy as the lake is too low to accommodate most activities, including fishing and fishing tournaments.

It is my understanding that over a decade ago a plan was developed for Alabama Power to use an alternative operating curve on Neely Henry Lake. This alternative operating curve allows for better recreational access by decreasing the winter draw down amount. The use of the alternative operating curve has been extended indefinitely and according to the 2013 DEIS there have been no significant problems resulting from use of the alternative operating curve.

I would strenuously urge you to consider developing the same alternatives for Weiss Lake. If such a plan could be implemented with no detriment to the lake or environment it would make a great impact on the local economy of Cherokee County. The Chamber of Commerce as informed me that Cherokee County is unable to attract many events in the November to March months because the lake levels are not at a recreational level. This leaves our lodging, restaurants, marinas, parks, and stores with significantly fewer patrons during these months.

Thank you for your consideration.

--

Marcie L. Foster  
Cherokee County Commissioner  
District #3  
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5635 Weiss Lake Blvd  
Leesburg, AL 35983  
(256)525-4000  
(206)339-5042

Commission Office:  
260 Cedar Bluff Rd  
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Phone: 256-927-3668  
Fax: 256-927-3669

**From:** [ACT-WCM](#)  
**To:** [ACT-WCM](#); [DIV.ACT.EIS](#); [jhall@cmcgas.com](mailto:jhall@cmcgas.com)  
**Subject:** Mobile District Contact Form: Water Hyacinth Problems in Our River Systems  
**Date:** Sunday, March 03, 2013 5:18:30 PM

---

This message was sent from the Mobile District website.

Message From: Jim C. Hall  
Email: [jhall@cmcgas.com](mailto:jhall@cmcgas.com)  
Response requested: Yes

Message:

Please address and control the water hyacinth in our River Systems.

Water Hyacinth Problems/Effects:

Eichhornia crassipes mats clog waterways, making boating, fishing and almost all other water activities, impossible  
water flow through water hyacinth mats is greatly diminished  
an acre of water hyacinth can weigh more than 200 tons; infestations can be many, many acres in size;  
mats may double their size in as little as 6-18 days (Mitchell 1976);  
water hyacinth mats degrade water quality by blocking the air-water interface and greatly reducing oxygen levels in the water, eliminating underwater animals such as fish (Penfound & Earle 1948)  
water hyacinth greatly reduces biological diversity: mats eliminate native submersed plants by blocking sunlight, alter emerged plant communities by pushing away and crushing them, and also alter animal communities by blocking access to the water and/or eliminating plants the animals depend on for shelter and nesting (Gowanloch 1944)  
in Florida, millions of dollars a year used to be spent on water hyacinth control; finally getting the plant under "maintenance control" has greatly reduced that expenditure...

**From:** [Blake Hardwich](#)  
**To:** [ACT-WCM](#)  
**Subject:** Manufacture Alabama Comments Regarding ACT DEIS  
**Date:** Thursday, May 30, 2013 11:13:37 AM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image005.jpg](#)  
[SOce VL282213053010090.pdf](#)

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Please find attached Manufacture Alabama comments regarding the Draft Master Water Control Manual Update and Draft Environmental Impact Statement (DEIS) for the Alabama-Coosa-Tallapoosa (ACT) River Basin.

If you have any questions or concerns, I can be reached at the number below.

Thank you for your attention to this matter.

Blake Hardwich  
Manufacture Alabama  
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Suite 710  
Montgomery, AL 36104  
334.386.3000  
334.386.3001(fax)

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May 30, 2013

VIA U.S. MAIL AND E-MAIL TO  
ACT-WCM@USACE.ARMY.MIL

Colonel Steven J. Roemhildt  
Commander, Mobile District  
U.S. Army Corps of Engineers  
ATTN: PD-EI (ACT-DEIS)  
P.O. Box 2288  
Mobile, Alabama 36628

**Re: Draft Master Water Control Manual Update and Draft Environmental Impact Statement (DEIS) for the Alabama-Coosa-Tallapoosa (ACT) River Basin**

Dear Colonel Roemhildt:

The U.S. Army Corps of Engineers recently published a Draft Water Control Manual and Draft Environmental Impact Statement for the Corps' operations on the Alabama-Coosa-Tallapoosa River System. This letter provides the comments of Manufacture Alabama. Manufacture Alabama is the state's only association dedicated exclusively to the competitive, legislative, regulatory and operational interests of manufacturers in Alabama and their partners. Manufacture Alabama represents all of the pulp & paper mills in the state including Georgia Pacific, International Paper and Resolute Forest Products, who all have plants located on the ACT River System. Manufacture Alabama also represents the chemical industry who also have plants located on the ACT River System.

Alabama residents, including Manufacture Alabama members, depend on releases from the Corps' two storage reservoirs in the ACT River System, namely, Lake Allatoona and Carters Lake. Those two reservoirs are substantial contributors to Coosa River inflow. The volume and time of year of releases from those two lakes are critically important.

We understand that the Corps' proposal reduces so-called navigation flows and releases for hydropower production during the late summer and fall, when those flows are most needed downstream. The Corps disclaims responsibility for navigation flows, saying that Allatoona and Carters "are not regulated specifically for navigation." DEIS at 4-7. However, elsewhere, the Corps acknowledges that the two reservoirs were built to support navigation. DEIS at 2-23, 2-28. It seems obvious that greater releases upstream would provide more flow downstream, and it is the Corps' statutory mission to provide for navigation. It is unreasonable for the Corps to withhold its own stored water and place the entire burden of navigation support on the lakes of

Alabama. Without the Corps' support, there will be less water in the Coosa River downstream, and stakeholders in Alabama will suffer.

Similarly, the Corps proposes to reduce hydropower releases from Allatoona and Carters during the dry season, opting instead to keep those lakes fuller for local recreation and Atlanta-area water supply. However, the same flows that turn the hydropower turbines are important for stakeholders on the Coosa River.

The Corps asserts that the water quality impacts of its proposal would be "minimal," but as the Corps acknowledges, "Water management activities may affect water quality under low flow conditions such that the state regulatory agencies may consider reevaluation of NPDES permits to confirm the system's assimilative capacity." DEIS at ES-48 – ES-49. The Corps also acknowledges negative impacts in Alabama for particular constituents and conditions. DEIS at ES-49. We disagree that those water quality impacts are "minimal." Low flow conditions typically occur in the dry months. That is when flow augmentation is most needed downstream, and it is also when the Corps proposes to withhold water for local recreation and supply.

The Corps seems to suggest that the only consequence of a negative water quality impact is a bureaucratic adjustment of permit limits. That is not accurate. If the Coosa River's assimilative capacity is reduced to the point that permit limits are implicated, that places any regulated facility's operations at risk. If operations slow or cease, that means less payroll for the local economy. Further, as the Corps' lack of support for downstream stakeholders becomes apparent, that limits our ability to recruit new businesses and industries to the state.

We understand the current proposal mainly involves issues of flow. However, aside from navigation flows, to restore actual commercial navigability on the Alabama River would provide Alabama an important tool for business recruitment. We urge the Corps to support commercial navigation with both adequate flow and a renewed program of channel maintenance.

In closing, we urge the Corps to reconsider its preferred alternative and operate its storage reservoirs as they were originally intended, which is to supplement flows during the times of year when they are the most scarce. Stakeholders downstream are counting on it.

Thank you for your consideration of these comments. Please feel free to contact me if you should have any questions or comments.

Sincerely,



President  
Manufacture Alabama

**From:** [Roy McAuley](#)  
**To:** [ACT-WCM](#)  
**Subject:** Alabama Pulp & Paper Council Comments on ACT Water Control Manual and EIS  
**Date:** Friday, May 31, 2013 11:49:46 AM  
**Attachments:** [APPCO ACT Comments.doc](#)

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To Whom it Concerns:

**Re: Draft Master Water Control Manual Update and Draft Environmental Impact Statement (DEIS) for the Alabama-Coosa-Tallapoosa (ACT) River Basin**

Alabama Pulp & Paper Council Comments on the Draft Master Water Control Manual Update and Draft Environmental Impact Statement (DEIS) for the Alabama-Coosa-Tallapoosa (ACT) River Basin are attached.

Roy McAuley  
Executive Director  
Alabama Pulp & Paper Council  
401 Adams Ave., Suite 710,  
Montgomery, AL 36104  
334 -386-3000 office  
334-313-3893 cell  
[roy@manufacturealabama.org](mailto:roy@manufacturealabama.org)



May 31, 2013

VIA E-MAIL TO

ACT-WCM@USACE.ARMY.MIL

Colonel Steven J. Roemhildt  
Commander, Mobile District  
U.S. Army Corps of Engineers  
ATTN: PD-EI (ACT-DEIS)  
P.O. Box 2288  
Mobile, Alabama 36628

**Re: Draft Master Water Control Manual Update and Draft Environmental Impact Statement (DEIS)  
for the Alabama-Coosa-Tallapoosa (ACT) River Basin**

Dear Colonel Roemhildt:

The U.S. Army Corps of Engineers recently published a Draft Water Control Manual and Draft Environmental Impact Statement for the Corps' operations on the Alabama-Coosa-Tallapoosa River System. This letter provides the comments of The Alabama Pulp & Paper Council (APPCO). The council deals with legislative, and regulatory interests of 13 pulp and paper manufacturers in Alabama. Five of these large facilities are located on the ACT system and are dependent on its flow for water supply and waste water assimilation. These five are Resolute Forest Products at Childersburg, three International Paper facilities at Prattville, Selma, and Pine Hill, and Alabama River Cellulose (Georgia Pacific) at Monroeville.

The flow at these facilities is dependent on releases from the Corps' two storage reservoirs in the ACT River System, namely, Lake Allatoona and Carters Lake. Those two reservoirs are substantial contributors to Coosa River inflow. The volume and time of year of releases from those two lakes are critically important. The Corps proposal reduces hydropower releases from Allatoona and Carters during the dry season, opting instead to keep those lakes fuller for local recreation and Atlanta-area water supply.

The Corps proposal is such that flows at Rome will be 250-500 cfs lower in the fall months of the year under the Preferred Alternative and that lake levels at Lake Allatoona will be "notably higher" in the fall months under drought conditions. During the drought of 2007, Alabama experienced major water quality and other environmental problems in the ACT Basin during the fall months. Indeed, some of these mills were on the verge of having to shut down operations and lay off employees because they were close to being unable to meet permit limits with their discharges. The Corps was part of meetings and weekly phone conferences that addressed the issue of adequate downstream flows. A reduction in flow in the Coosa River at the Alabama state line by 250-500 cfs will almost certainly cause far graver environmental and economic consequences than have been experienced during prior similar droughts.

The Corps asserts that the water quality impacts of its proposal would be “minimal,” but as the Corps acknowledges, “Water management activities may affect water quality under low flow conditions such that the state regulatory agencies may consider reevaluation of NPDES permits to confirm the system’s assimilative capacity”. The Corps also acknowledges negative impacts in Alabama for particular constituents and conditions. The water quality impacts are not likely to be “minimal.” Low flow conditions typically occur in the dry months. That is when flow augmentation is most needed downstream, and it is also when the Corps proposes to withhold water for local recreation and supply.

The Corps seems to suggest that the only consequence of a negative water quality impact is a bureaucratic adjustment of permit limits. That is not accurate. If the Coosa River’s assimilative capacity is reduced to the point that permit limits are implicated, that places any regulated facility’s operations at risk. If operations slow or cease, that means less payroll for the local economy.

In closing, it is inconceivable that the Corps would even consider holding water in Alatoona/Carter for “recreational” purposes given the downstream concerns for water quality and how it relates to our paper mill jobs. We urge the Corps to reconsider its preferred alternative and operate its storage reservoirs as they were originally intended, which is to supplement flows during the times of year when they are the most scarce. Stakeholders downstream are counting on it.

Thank you for your consideration of these comments. Please feel free to contact me if you should have any questions or comments.

Sincerely,

Roy McAuley  
Executive Director  
Alabama Pulp & Paper Council  
401 Adams Ave., Suite 710  
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