Berkeley the City of Lake

October 23, 2008

Colonel Byron G. Jorns
Commander Mobile District
U.S. Army Corps of Engineers
P.O. Box 2288
Mobile, Al. 36628-0001

RE: Request by Georgia Environmental Protection Division (EPD) to reduce flow from Lake Lanier for water quality from 750 cfs to 650 cfs this winter

Dear Colonel Jorns:

We wholeheartedly support EPD's request to reduce the releases from Lake Lanier this winter to meet the reduced flow target at Peachtree Creek of 650 cfs. We believe that during this prolonged drought we must all do whatever we can to preserve storage in Lake Lanier. Our citizens along with all the others in unincorporated Gwinnett County are doing our part by supporting the state's watering restrictions and other water conservation efforts.

Please grant EPD's request for the reduced releases from Lake Lanier. Drinking water for our citizens is supplied by the Gwinnett County Water System. This water system has its intakes directly in Lake Lanier. It is very important that the lake water elevation does not recede such that the county has to lower its raw water intake at a substantial cost to all the customers of the Gwinnett Water System.

Sincerely,

Lois D. Salter

Lois D. Salter
Mayor, City of Berkeley Lake
President, Gwinnett Municipal Asssociation

100 YEARS

GREATER HALL
CHAMBER OF COMMERCE

A CENTURY OF BUSINESS VISION

230 E.E. Butler Parkway
Post Office Box 374
Gainesville, Georgia 30503

October 28, 2008

Colonel Byron G. Jorns, District Commander
Department of the Army
Mobile District, U.S. Army Corps of Engineers
ATTN: CESAM-DE
Post Office Box 2288
Mobile, Alabama 36628-0001

Dear Colonel Jorns:

The Greater Hall Chamber of Commerce and its 3000 business and citizen members are very concerned about the present condition of Lake Sidney Lanier....and the health and viability of Lake Lanier in the future.

Gainesville / Hall County, Georgia, USA...has been fortunate to have Lake Lanier in its "back yard" for over 50 years....over 400 miles of its shoreline border this county. We are proud to have Lake Lanier as a recreational resource, water resource, power generator....plus a beautiful home setting. Lake Lanier is by far the most important economic engine for this county and this region. Of course, it is also important to the entire State of Georgia and our neighboring states. We certainly understand that we must share Lake Lanier's waters.

The U.S. Army Corps of Engineers must update the water control manuals for the ACF Basin .....including studies of science, technology and economic impacts.... with the most up-to-date factual information examining new and different ways of operating Lake Lanier and the other Corps projects in the ACF Basin. We must bring the operations of our water resources to the twenty-first century.

Yes, we are still experiencing a drought. Yes, the local, state and national economy is suffering. Yes, we are seeing extreme fuel price fluctuation. These reasons stated are putting added pressure on Lake Lanier and its economic importance to this county and region. Today, Lake Lanier is more than

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Fax 770.535.8419

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"FROM ISLANDS TO HIGHLANDS...
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Page 2.

18 feet below full pool and dropping at a rapid rate. Businesses and citizens are suffering because Lake Lanier's waters are at record low levels. A large part of Lake Lanier is unsafe for use. The visitors to Lake Lanier are down over 1,000,000 from 2007. We are seeing other states use Lake Lanier's low levels as a tool to recruit businesses from the state of Georgia.

The U.S. Army Corps of Engineers can help.....by better management of Lake Lanier and the ACF, particularly during drought times.

Thank you and the Corps for partnering with the Gainesville / Hall County community in protecting and enhancing Lake Lanier.

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Chairman of the Board

Emily Bagwell
Whelchel, Dunlap, Jarrard & Walker
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VISION 2030

Kathryn L. Dunlap
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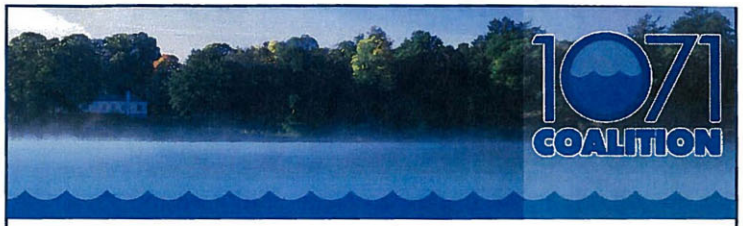

Dear Community Leader:

The lifeblood of this region is literally going down the drain.

Lake Sidney Lanier is not only a primary economic engine of north Georgia; it is the primary source of our region's water supply. Yet the lake's ability to sustain our water supply and recreation needs is threatened by excessive water releases from Buford Dam. These current water management practices have contributed to Lanier's historic low levels. Although a full summer lake level is 1,071 feet above sea level, the lake has recently been drawn down to a record low of 1,050 feet. **We need you to join the 1071 Coalition to help us reverse these practices and preserve our quality of life.**

Over the next 36 months, federal officials will make decisions that will establish how water levels will be managed for years to come. Without proper state leadership and old fashion community activism, the needs of overzealous states and so-called endangered species will overtake our interests; leading to dry lake bottoms, a jeopardized water supply, and a shrinking economy.

To give you an idea of the extent of the problem, from May to

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Kerry Armstrong
Duke Realty

Philip Burton
Owner, Gainesville Marina

Johnny Crowe
Owner, Watersports Central

Kit Dunlap
President & CEO
Greater Hall Chamber of Commerce

Alex Laidlaw
Vice President
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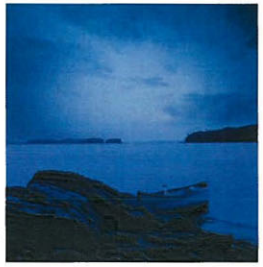

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With your financial support, this newly formed coalition will focus on three objectives:

1. ***Commission a study on the impact of Lake Lanier on the area economy.*** This data will be used to counter information disseminated by other states and to bolster our position in water management discussions. Federal officials need to understand the harm lower lake levels cause to area businesses, merchants and property owners.

2. ***Urge our federal and state officials to give this issue their highest priority and take action in the best interests of Georgians.*** In addition to lingering litigation, there are multiple studies that need to be advanced on endangered species and how best to manage for minimal flow requirements within the basin. These studies must provide objective analysis. We need credible experts to apply pressure at the proper times and work with other common interests to advance our cause.

3. ***Serve as a voice in the public relations fight between the states.*** Armed with data and experts, we need to launch a public relations campaign to push our message through the media and policymakers.

Although there are other organizations engaged in this issue, such as the Lake Lanier Association and the Atlanta Regional Commission, there is no single entity whose sole mission is maintaining healthy water levels in Lake Lanier and representing our interests. In order to devote full time attention and hire the necessary expertise to tackle this issue (legal, environmental, engineering, government and public relations), we have projected this three-year battle will consume a total budget of $700,000.

While the drought may eventually lift, history has shown us that harsh conditions will return. Therefore we cannot become complacent while federal officials make important decisions that affect our livelihood. Please help us protect this resource and our economic prosperity by choosing a membership level on the attached form and submit a tax deductible contribution from corporate, group or personal funds. We are asking for a commitment of three annual installments to fund this effort.

We invite you to hear more about our effort by attending our kick-off reception to be held at *Legacy Lodge and Conference Center* on Lake Lanier Islands. The reception will be held on **Tuesday, December 9, at 6 p.m.** Please call 770-458-6311 to RSVP. We hope you will participate in this vital effort either in person or through your financial support.

Click here to submit your membership information

Sincerely,
1071 Coalition Board of Directors

www.1071COALITION.org
P.O. Box 6059
Gainesville, GA 30504
770.458.6311

Cumming-Forsyth Chamber of Commerce

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President, Norton Agency

Joni Owens
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MISSION STATEMENT

1071 Coalition is a non-profit organization comprised of citizens, civic groups, businesses and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science-based water releases necessary for the ACF River Basin.

The 1071 Coalition has made application to the IRS for 501(c)(3) status.

OUR LAKE IN CRISIS

Banding together for Lake Lanier

Local power brokers form advocacy group

BY HARRIS BLACKWOOD
hblackwood@gainesvilletimes.com

An advocacy group with plans to become a major voice for Lake Lanier was officially announced Tuesday.

The 1071 Coalition is named for the full pool level of the lake, 1,071 feet above mean sea level. The directors of the coalition are a powerful contingent of business leaders, lake homeowners and top executives of chambers of commerce.

Grier Todd, chief operating officer for Lake Lanier Islands resort, has been tapped as president of the coalition.

"We see this as a broad-based effort to bring business, government and individuals under one umbrella on behalf of Lake Lanier," Todd said.

Among its first goals is to complete an economic impact study of the lake to counter information coming from other states.

Also on the group's early agenda is to become an active participant in the update of water control manuals used by the U.S Army Corps of Engineers for the Apalachicola-Chattahoochee-Flint basin.

The first in a series of meetings on the project is scheduled for today in Gainesville.

Organizers thought that there is no single entity whose sole mission is maintaining healthy water levels in Lake Lanier and representing lake interests. The coalition estimates that the three-year effort during the development of the water plan for the basin will require a budget of $700,000 for legal fees, research, engineering and public relations.

"Businesses are hurting, even closing, and residents are losing property values," said Kit Dunlap, president and chief executive of the Greater Hall Chamber of Commerce and vice president of the 1071 Coalition. "Local governments have implemented appropriate conservation measures and emergency operating measures. Business and local governments are doing our part, because we are feeling firsthand the devastating impact of the lake's low levels."

■ Please see LANIER, Page 4A

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Kit Dunlap,
CEO, Greater Hall Chamber of Commerce, vice president of the 1071 Coalition

0499

LANIER: Advocacy group to meet Dec. 9

■ Continued from PAGE 1A

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Todd's comments were echoed by Wilton Rooks, an officer of the Lake Lanier Association and secretary of the 1071 Coalition.

"Considering Lake Lanier has a small watershed and is slow to fill, the corps needs to conserve as much storage as possible at the top of the ACF system," Rooks said.

In addition to Dunlap, chamber of commerce executives from Forsyth and Gwinnett counties are on the board, as well as marina owners and real estate firms that specialize in lake properties.

Gainesville civic leaders Jim Walters and Philip Wilhelt also were named to the board of directors.

The group has scheduled its first major meeting for 6 p.m. Dec. 9 at Legacy Lodge at Lake Lanier Islands.

0500

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The U.S. Army Corps of Engineers must update the water control manuals for the ACF Basin .....including studies of science, technology and economic impacts.... with the most up-to-date factual information examining new and different ways of operating Lake Lanier and the other Corps projects in the ACF Basin. We must bring the operations of our water resources to the twenty-first century.

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Emily Bagwell
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Denise Deal
Executive Director
VISION 2030

Kathryn L. Dunlap
President & CEO

0500

MEDIA CONTACT:
Rebecca Wallace
404-310-3179
rebecca@1071coalition.org

1071 COALITION

ADVOCACY GROUP FORMS TO STOP EXCESSIVE WATER RELEASES FROM LANIER'S BUFORD DAM

Grassroots effort will push for the preservation of Lake Lanier's water levels

ATLANTA – (October 28, 2008) – Today a grassroots effort to reform current management practices of Lake Sidney Lanier was announced in the way of the 1071 Coalition. Named for the feet above sea level at which Lake Lanier should be in the summer recreation season, the coalition is comprised of community leaders, business owners, chambers of commerce, residents and other citizens in the Lake Lanier area concerned with the preservation of the lake's water levels and its impact on the region's economy.

"Three and a half million people and businesses depend on Lake Lanier for water supply and their livelihoods," said Grier Todd, COO, Lake Lanier Islands Resort and President of the 1071 Coalition. "Millions more depend on the lake for recreation. Recent water management practices are hurting Lanier's ability to meet our water supply and recreation needs," he said.

The Coalition has set out to reverse the management practices of the lake through three initiatives:

1. **Commission a study on the impact of Lake Lanier on the area economy.** This data will be used to counter information disseminated by other states and bolster Georgia's case.
2. **Urge our federal and state officials to give this issue their highest priority** and take action in the best interests of Georgians, including the commissioning of studies that determine the actual needs of endangered species and minimal flow requirements throughout the system.
3. **Serve as a voice in the public relations fight between the states,** armed with data and experts.

"Businesses are hurting – even closing, and residents are losing property values," said Kit Dunlap, President and CEO, Greater Hall Chamber of Commerce and Vice President of the 1071 Coalition. "Local governments have implemented appropriate conservation measures and emergency operating measures. Business and local governments are doing our part, because we are feeling first-hand the devastating impact of the lake's low levels."

Through proper management, Lake Lanier would not be in its present state of historically low levels, according to the coalition. "This lake lost a great deal of storage in October and November of last year," said Alex Laidlaw, Vice President, Operations of Westrec Marinas and Coalition Board member. "Excessive releases were seven times greater than the natural in-flow; those releases could have supplied metro Atlanta's water needs for well over a year."

- more -

Part of the public relations battle in which the Coalition hopes to gain ground is debunking the myths regarding Atlanta's water consumption and how reducing flows from the lake will impact other interests downstream. "Our neighboring states are incorrect when trying to lay blame on Atlanta's population growth," said Wilton Rooks, Vice President, Technical Programs with the Lake Lanier Association and Coalition Board member. "Metro Atlanta consumes just one to two percent of the water in the Apalachicola-Chattahoochee-Flint (ACF) basin above the Florida line."

Ninth District Congressman Nathan Deal, a supporter of the 1071 Coalition, believes the flows can be reduced without threatening downstream users. "Many diverse stakeholders within the basin are in agreement that there is sufficient water in the ACF basin to meet reasonable needs without causing harm to the environment or to the various users," said Congressman Deal. "We must push for alternative operating plans to manage our waters more effectively."

The 1071 Coalition plans to be an active participant in the U.S. Army Corps of Engineers update to Lanier's water control plan. "The water control plan needs to maximize the ability of the lake to refill to provide a cushion in times of drought, which have become much more frequent and severe in recent years," said Rooks. "Considering Lake Lanier has a small watershed and is slow to fill, the Corps needs to conserve as much storage as possible at the top of the ACF system."

The 1071 Coalition will hold its kick-off reception and membership drive on December 9, 2008 at 6:00 p.m. at Legacy Lodge and Conference Center on Lake Lanier Islands. For more information, please visit www.1071Coalition.org.

About the 1071 Coalition:
The 1071 Coalition is a non-profit organization comprised of citizens, civic groups, business and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science-based water releases necessary for the Apalachicola-Chattahoochee-Flint river basin. Founding members of the 1071 Coalition Board of Directors are:

Grier Todd, President	*COO, Lake Lanier Islands Resort*
Kit Dunlap, Vice President	*President & CEO, Greater Hall Chamber of Commerce*
Wilton Rooks, Secretary	*Vice President, Technical Programs, Lake Lanier Association*
Alex Laidlaw, Treasurer	*Vice President Operations, Westrec Marinas*
Kerry Armstrong	*Sr. Vice President, Atlanta Office, Duke Realty*
Philip Burton	*Owner, Gainesville Marina*
James McCoy	*President & CEO, Cumming-Forsyth Chamber of Commerce*
Johnny Crowe	*Owner, Watersports Central*
Terri Johndahl	*CEO, CAB Incorporated*
Jim Maran	*President & CEO, Gwinnett County Chamber of Commerce*
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###

0500

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■ Please see LANIER, Page 4A

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LANIER: Advocacy group to meet Dec. 9

■ Continued from PAGE 1A

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0501

RUSSELL

NASHVILLE***ATLANTA***SAVANNAH

RUSSELL LANDSCAPE GROUP, INC

To: US Army Corps of Engineers
Re: Updating Water Control Manuals

October 29, 2008

Dear Sirs/Madams:

As a concerned citizen and business man, I am submitting support for updating the current water control manuals which govern federal reservoirs (Lake Lanier and Lake Allatoona) that serve Metro Atlanta.

I believe that the Corp should update future reservoir operations and not simply make edits to a plan that documents existing operations. The updated water plan needs to make strong changes to ensure all operations are managed wisely. The new Water Control Plan should not simply replicate existing past operations which have unnecessarily drained these reservoirs to low water levels. I am in hope that the Corp of Engineers will take the responsibility to study all possible alternatives to determine the most effective and best use of reservoir storage given current basin conditions.

At present, 3 million residents in North Georgia rely on Lake Lanier and the Chattahoochee River as their sole source of drinking water. Just as important, Lake Lanier is the major resource that supplies water to Metro Atlanta's business and industry community, including my profession as a landscape contractor. The Green industry affords an 8 billion dollar annual economic impact to the state of Georgia.

I additionally encourage the Corp to consider alternative operating plans to balance upstream needs with those downstream before adopting a New Water Control Plan. The ACF River Basin is sufficient enough to meet both regions water needs if managed properly. After all, the entire Metro Atlanta region currently uses less than 2% of water in the ACF Basin.

As a citizen of this great area, I encourage you to consider a New Water Control Plan that accommodates withdrawals consistent with projections contained in the Metro North Georgia Water Planning Districts Water Supply and Conservation Plan.

Thanking you in advance I remain

Sincerely,

Bill Russell

William E Russell Ph-D President/CEO
Russell Landscape Groups, Inc.

1071 COALITION
P.O. Box 6059
Gainesville, GA 30504
770.458.6311

October 29, 2008

U.S. Army Corps of Engineers
To Whom It May Concern:

On behalf of the 1071 Coalition of Lake Lanier, we submit to the U.S. Army Corps of Engineers (USACE) these comments on the scope of the review used to update the water control plan for the Apalachicola Chattahoochee Flint (ACF) Basin.

The 1071 Coalition is a non-profit organization comprised of citizens, civic groups, businesses and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science- based water releases necessary for the ACF river basin.

We believe the Corps should study alternatives to the current operation plans rather than simply document existing practices. The plan should manage our water resources much more effectively according to project purposes. Through wise management of our reservoirs we believe there is sufficient water in the basin to meet the reasonable needs for municipal and industrial water supply with no adverse environmental impact on other users.

The USACE should give more weight to the highest and best use of reservoir storage during periods of extended drought. Should Congressional approval be needed to implement the preferred plan resulting from this process, we believe such approval should be sought.

The 1071 Coalition asks that the update of the water control plans consider the following:

- Facts and sound science should be the basis for the water control plans.
- Water supply is the highest and best use of storage in Lake Lanier.
- A primary objective of the water control plan should be to refill the Lake by June 1 of each year.
- The water control plan should focus on retaining storage at the top of the basin in order to augment flows at critical times.
- The new water control plan should be designed to accommodate withdrawals that are consistent with projections within the District's Water Supply and Conservation Plan.
- The plan should recognize Lake Lanier should not be the faucet for the entire basin when it is only fed by a garden hose (small watershed).

We look forward to participating in this process.

Sincerely,

Grier Todd
President

A non-profit organization comprised of citizens, civic groups, businesses and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science-based water releases necessary for the ACF River Basin.

www.1071COALITION.org

100 YEARS
GREATER HALL
CHAMBER OF COMMERCE
A CENTURY OF BUSINESS VISION

230 E.E. Butler Parkway
Post Office Box 374
Gainesville, Georgia 30503

October 28, 2008

Colonel Byron G. Jorns, District Commander
Department of the Army
Mobile District, U.S. Army Corps of Engineers
ATTN: CESAM-DE
Post Office Box 2288
Mobile, Alabama 36628-0001

Dear Colonel Jorns:

The Greater Hall Chamber of Commerce and its 3000 business and citizen members are very concerned about the present condition of Lake Sidney Lanier....and the health and viability of Lake Lanier in the future.

Gainesville / Hall County, Georgia, USA...has been fortunate to have Lake Lanier in its "back yard" for over 50 years....over 400 miles of its shoreline border this county. We are proud to have Lake Lanier as a recreational resource, water resource, power generator....plus a beautiful home setting. Lake Lanier is by far the most important economic engine for this county and this region. Of course, it is also important to the entire State of Georgia and our neighboring states. We certainly understand that we must share Lake Lanier's waters.

The U.S. Army Corps of Engineers must update the water control manuals for the ACF Basin .....including studies of science, technology and economic impacts.... with the most up-to-date factual information examining new and different ways of operating Lake Lanier and the other Corps projects in the ACF Basin. We must bring the operations of our water resources to the twenty-first century.

Yes, we are still experiencing a drought. Yes, the local, state and national economy is suffering. Yes, we are seeing extreme fuel price fluctuation. These reasons stated are putting added pressure on Lake Lanier and its economic importance to this county and region. Today, Lake Lanier is more than

770.532.6206
Fax 770.535.8419

www.greaterhallchamber.com
www.siliconlakelanier.com

"FROM ISLANDS TO HIGHLANDS...
WE'VE GOT IT ALL!"

Colonel Byron G. Jorns, District Commander
October 29, 2008
Page 2.

18 feet below full pool and dropping at a rapid rate. Businesses and citizens are suffering because Lake Lanier's waters are at record low levels. A large part of Lake Lanier is unsafe for use. The visitors to Lake Lanier are down over 1,000,000 from 2007. We are seeing other states use Lake Lanier's low levels as a tool to recruit businesses from the state of Georgia.

The U.S. Army Corps of Engineers can help.....by better management of Lake Lanier and the ACF, particularly during drought times.

Thank you and the Corps for partnering with the Gainesville / Hall County community in protecting and enhancing Lake Lanier.

Sincerely,

R.K. Whitehead
Whitehead Die Casting
Chairman of the Board

Emily Bagwell
Whelchel, Dunlap, Jarrard & Walker
Chair Elect

Denise Deal
Executive Director
VISION 2030

Kathryn L. Dunlap
President & CEO

0503

MEDIA CONTACT:
Rebecca Wallace
404-310-3179
rebecca@1071coalition.org

1071 COALITION

ADVOCACY GROUP FORMS TO STOP EXCESSIVE WATER RELEASES FROM LANIER'S BUFORD DAM

Grassroots effort will push for the preservation of Lake Lanier's water levels

ATLANTA – (October 28, 2008) – Today a grassroots effort to reform current management practices of Lake Sidney Lanier was announced in the way of the 1071 Coalition. Named for the feet above sea level at which Lake Lanier should be in the summer recreation season, the coalition is comprised of community leaders, business owners, chambers of commerce, residents and other citizens in the Lake Lanier area concerned with the preservation of the lake's water levels and its impact on the region's economy.

"Three and a half million people and businesses depend on Lake Lanier for water supply and their livelihoods," said Grier Todd, COO, Lake Lanier Islands Resort and President of the 1071 Coalition. "Millions more depend on the lake for recreation. Recent water management practices are hurting Lanier's ability to meet our water supply and recreation needs," he said.

The Coalition has set out to reverse the management practices of the lake through three initiatives:

1. **Commission a study on the impact of Lake Lanier on the area economy.** This data will be used to counter information disseminated by other states and bolster Georgia's case.
2. **Urge our federal and state officials to give this issue their highest priority** and take action in the best interests of Georgians, including the commissioning of studies that determine the actual needs of endangered species and minimal flow requirements throughout the system.
3. **Serve as a voice in the public relations fight between the states,** armed with data and experts.

"Businesses are hurting – even closing, and residents are losing property values," said Kit Dunlap, President and CEO, Greater Hall Chamber of Commerce and Vice President of the 1071 Coalition. "Local governments have implemented appropriate conservation measures and emergency operating measures. Business and local governments are doing our part, because we are feeling first-hand the devastating impact of the lake's low levels."

Through proper management, Lake Lanier would not be in its present state of historically low levels, according to the coalition. "This lake lost a great deal of storage in October and November of last year," said Alex Laidlaw, Vice President, Operations of Westrec Marinas and Coalition Board member. "Excessive releases were seven times greater than the natural in-flow; those releases could have supplied metro Atlanta's water needs for well over a year."

- more -

Part of the public relations battle in which the Coalition hopes to gain ground is debunking the myths regarding Atlanta's water consumption and how reducing flows from the lake will impact other interests downstream. "Our neighboring states are incorrect when trying to lay blame on Atlanta's population growth," said Wilton Rooks, Vice President, Technical Programs with the Lake Lanier Association and Coalition Board member. "Metro Atlanta consumes just one to two percent of the water in the Apalachicola-Chattahoochee-Flint (ACF) basin above the Florida line."

Ninth District Congressman Nathan Deal, a supporter of the 1071 Coalition, believes the flows can be reduced without threatening downstream users. "Many diverse stakeholders within the basin are in agreement that there is sufficient water in the ACF basin to meet reasonable needs without causing harm to the environment or to the various users," said Congressman Deal. "We must push for alternative operating plans to manage our waters more effectively."

The 1071 Coalition plans to be an active participant in the U.S. Army Corps of Engineers update to Lanier's water control plan. "The water control plan needs to maximize the ability of the lake to refill to provide a cushion in times of drought, which have become much more frequent and severe in recent years," said Rooks. "Considering Lake Lanier has a small watershed and is slow to fill, the Corps needs to conserve as much storage as possible at the top of the ACF system."

The 1071 Coalition will hold its kick-off reception and membership drive on December 9, 2008 at 6:00 p.m. at Legacy Lodge and Conference Center on Lake Lanier Islands. For more information, please visit www.1071Coalition.org.

About the 1071 Coalition:
The 1071 Coalition is a non-profit organization comprised of citizens, civic groups, business and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science-based water releases necessary for the Apalachicola-Chattahoochee-Flint river basin. Founding members of the 1071 Coalition Board of Directors are:

Grier Todd, President	*COO, Lake Lanier Islands Resort*
Kit Dunlap, Vice President	*President & CEO, Greater Hall Chamber of Commerce*
Wilton Rooks, Secretary	*Vice President, Technical Programs, Lake Lanier Association*
Alex Laidlaw, Treasurer	*Vice President Operations, Westrec Marinas*
Kerry Armstrong	Sr. *Vice President, Atlanta Office, Duke Realty*
Philip Burton	*Owner, Gainesville Marina*
James McCoy	*President & CEO, Cumming-Forsyth Chamber of Commerce*
Johnny Crowe	*Owner, Watersports Central*
Terri Johndahl	*CEO, CAB Incorporated*
Jim Maran	*President & CEO, Gwinnett County Chamber of Commerce*
Frank Norton, Jr.	*President, Norton Agency*
Joni Owens	*Owner, JLO Enterprises and Real Estate*
Jon Stovall	*Owner, Bald Ridge Marina*
Jim Walters	*President, Walters Management Company*
Philip Wilheit, Sr.	*President & CEO, Wilheit Packaging*

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0503

1071 COALITION

Dear Community Leader:

The lifeblood of this region is literally going down the drain.

Lake Sidney Lanier is not only a primary economic engine of north Georgia; it is the primary source of our region's water supply. Yet the lake's ability to sustain our water supply and recreation needs is threatened by excessive water releases from Buford Dam. These current water management practices have contributed to Lanier's historic low levels. Although a full summer lake level is 1,071 feet above sea level, the lake has recently been drawn down to a record low of 1,050 feet. **We need you to join the 1071 Coalition to help us reverse these practices and preserve our quality of life.**

Over the next 36 months, federal officials will make decisions that will establish how water levels will be managed for years to come. Without proper state leadership and old fashion community activism, the needs of overzealous states and so-called endangered species will overtake our interests; leading to dry lake bottoms, a jeopardized water supply, and a shrinking economy.

To give you an idea of the extent of the problem, from May to November of 2007, flows supplied to the Apalachicola River under an Interim Operating Plan were 220% greater than its natural unimpaired flow. From October to November of 2007, releases from Lake Lanier alone were seven times greater than inflow. The excess water released during this two-month period could have supplied metro Atlanta's water needs for well over a year. **Unless we act now and provide suitable alternatives, federal officials will base their long-term water control plan on recent, harmful practices.**

BOARD OF DIRECTORS

Grier Todd, President
COO, Lake Lanier Islands Resort

Kit Dunlap, Vice President
President & CEO, Greater Hall Chamber of Commerce

Wilton Rooks, Secretary
Vice President, Technical Programs, Lake Lanier Association

Alex Laidlaw, Treasurer
Vice President, Operations, Westrec Marinas

Kerry Armstrong
Sr. Vice President, Atlanta Office, Duke Realty

Philip Burton
Owner, Gainesville Marina

James McCoy
President & CEO, Cumming-Forsyth Chamber of Commerce

Johnny Crowe
Owner, Watersports Central

Terri Johndahl
CEO, CAB Incorporated

Jim Maran

To hear our neighboring states tell it, Georgia has a consumption problem that stems from unchecked growth. The facts tell us a different story. Metro Atlanta, which includes 72% of the population within the Apalachicola-Chattahoochee-Flint (ACF) basin, consumes just 1-2% of the water in the ACF basin above the Florida line.

With your financial support, this newly formed coalition will focus on three objectives:

1. ***Commission a study on the impact of Lake Lanier on the area economy.*** This data will be used to counter information disseminated by other states and to bolster our position in water management discussions. Federal officials need to understand the harm lower lake levels cause to area businesses, merchants and property owners.
2. ***Urge our federal and state officials to give this issue their highest priority and take action in the best interests of Georgians.*** In addition to lingering litigation, there are multiple studies that need to be advanced on endangered species and how best to manage for minimal flow requirements within the basin. These studies must provide objective analysis. We need credible experts to apply pressure at the proper times and work with other common interests to advance our cause.
3. ***Serve as a voice in the public relations fight between the states.*** Armed with data and experts, we need to launch a public relations campaign to push our message through the media and policymakers.

Although there are other organizations engaged in this issue, such as the Lake Lanier Association and the Atlanta Regional Commission, there is no single entity whose sole mission is maintaining healthy water levels in Lake Lanier and representing our interests. In order to devote full time attention and hire the necessary expertise to tackle this issue (legal, environmental, engineering, government and public relations), we have projected this three-year battle will consume a total budget of $700,000.

While the drought may eventually lift, history has shown us that harsh conditions will return. Therefore we cannot become complacent while federal officials make important decisions that affect our livelihood. Please help us protect this resource and our economic prosperity by choosing a membership level on our web site. By submitting your information, you will be notified on how to send in a tax-deductible contribution from corporate, group or personal funds. We are asking for a commitment of three annual installments to fund this effort.

We invite you to hear more about our effort by attending our kick-off reception to be held at Legacy Lodge and Conference Center on Lake Lanier Islands. The reception will be held on **Tuesday, December 9, at 6 p.m.** Please call 770-458-6311 to RSVP. We hope you will participate in this vital effort either in person or through your financial support.

Sincerely,
1071 Coalition Board of Directors

President & CEO, Gwinnett County Chamber of Commerce

Frank Norton, Jr.
President, Norton Agency

Joni Owens
Owner, JLO Enterprises and Real Estate

Jon Stovall
Owner, Bald Ridge Marina

Jim Walters
President, Walters Management Company

Philip Wilheit, Sr.
President & CEO, Wilheit Packaging

Annual Membership Levels

Founder
$10,000 or greater

Charter (corporate, group or government)
$5,000 or greater

Sponsor
$2,000 or greater

Associate
$1,000 or greater

Individual
$100.00 or greater

MISSION STATEMENT

1071 Coalition is a non-profit organization comprised of citizens, civic groups, businesses and other entities dedicated to maintaining water levels in Lake Sidney Lanier that sustain water supply, recreation, and economic prosperity through the advocacy of appropriate, science-based water releases necessary for the ACF River Basin.

The 1071 Coalition has made application to the IRS for 501(c)(3) status.

www.1071COALITION.org
P.O. Box 6059
Gainesville, GA 30504
770.458.6311

OUR LAKE IN CRISIS

Banding together for Lake Lanier

Local power brokers form advocacy group

BY HARRIS BLACKWOOD
hblackwood@gainesvilletimes.com

An advocacy group with plans to become a major voice for Lake Lanier was officially announced Tuesday.

The 1071 Coalition is named for the full pool level of the lake, 1,071 feet above mean sea level. The directors of the coalition are a powerful contingent of business leaders, lake homeowners and top executives of chambers of commerce.

Grier Todd, chief operating officer for Lake Lanier Islands resort, has been tapped as president of the coalition.

"We see this as a broad-based effort to bring business, government and individuals under one umbrella on behalf of Lake Lanier," Todd said.

Among its first goals is to complete an economic impact study of the lake to counter information coming from other states.

Also on the group's early agenda is to become an active participant in the update of water control manuals used by the U.S Army Corps of Engineers for the Apalachicola-Chattahoochee-Flint basin.

The first in a series of meetings on the project is scheduled for today in Gainesville.

'Businesses are hurting, even closing, and residents are losing property values.'

Kit Dunlap, CEO, Greater Hall Chamber of Commerce, vice president of the 1071 Coalition

Organizers thought that there is no single entity whose sole mission is maintaining healthy water levels in Lake Lanier and representing lake interests. The coalition estimates that the three-year effort during the development of the water plan for the basin will require a budget of $700,000 for legal fees, research, engineering and public relations.

"Businesses are hurting, even closing, and residents are losing property values," said Kit Dunlap, president and chief executive of the Greater Hall Chamber of Commerce and vice president of the 1071 Coalition. "Local governments have implemented appropriate conservation measures and emergency operating measures. Business and local governments are doing our part, because we are feeling firsthand the devastating impact of the lake's low levels."

■ Please see LANIER, Page 4A

0503

LANIER: Advocacy group to meet Dec. 9

■ Continued from PAGE 1A

Other advocacy groups along the basin, such as representatives of the seafood industry in Apalachicola Bay, have had a strong presence in the media and with government agencies. The new coalition hopes to establish a strong voice for the upper portion of the basin.

"Once the lake is full again, we want to make sure that other stakeholders recognize that Lanier is different from the other reservoirs in the basin," Todd said. "We understand that this is the faucet for the basin, but it is filled with a garden hose."

Todd's comments were echoed by Wilton Rooks, an officer of the Lake Lanier Association and secretary of the 1071 Coalition.

"Considering Lake Lanier has a small watershed and is slow to fill, the corps needs to conserve as much storage as possible at the top of the ACF system," Rooks said.

In addition to Dunlap, chamber of commerce executives from Forsyth and Gwinnett counties are on the board, as well as marina owners and real estate firms that specialize in lake properties.

Gainesville civic leaders Jim Walters and Philip Wilhelt also were named to the board of directors.

The group has scheduled its first major meeting for 6 p.m. Dec. 9 at Legacy Lodge at Lake Lanier Islands.

0504

Metropolitan North Georgia Water Planning District

October 28, 2008

Colonel Byron G. Jorns, District Commander
Department of the Army
Mobile District, U.S. Army Corps of Engineers
ATTN: CESAM-DE
Post Office Box 2288
Mobile, Alabama 36628-0001

Dear Colonel Jorns:

Thank you for the opportunity to provide comments on this crucial step of updating the Corps' water control manuals for the ACF Basin. The health and sustainability of Lake Lanier as a water supply source for over three million people is extremely important. We hope that the Corps will take this opportunity to truly update the water control manuals used to operate each of the Corps projects in the ACF and not just replicate the existing operations that have caused concern over the sustainability of Lake Lanier. The Corps must consider alternative operating plans to balance water supply needs and economic impact with downstream needs before adopting a new Water Control Plan. These alternative operating plans should be developed to manage the ACF Basin much more effectively and should be based on facts and sound science.

As a part of this project the Corps should consider the water supply needs of the region as identified in the Metropolitan North Georgia Water Planning District's long range plans. Water use in the metropolitan area is reasonable by any measure. The net amount of water withdrawn for water supply from Lake Lanier and the river downstream of the dam accounts for 1% of the flows at the Florida line in normal years, 2% in drought years. We believe there is enough water in the ACF Basin to meet all reasonable needs if the reservoirs are managed properly.

Lake Lanier's recreational value should also be an important consideration for the Corps during this update process. Lake Lanier receives approximately eight million visits per year resulting in an economic impact of $5.5 billion annually.

Thank you again for allowing me to submit comments. Please do not hesitate to call if you have any questions or if I can be of assistance to you in any way.

Sincerely,

Kathryn L. Dunlap
Chair, Metropolitan North Georgia Water Planning District

40 Courtland Street, NE ♦ Atlanta, Georgia 30303-2538
Telephone: (404) 463-3100 ♦ Facsimile (404) 463-3254

October 29, 2008

In response to the U.S. Army Corps of Engineers, Mobile District, public scoping meetings, we respectfully submit the following points to consider in rewriting the Operation Manual for the ACF Basin:

1) First and foremost, logic has to govern the release of water from Lake Lanier. This is obviously not part of the present plan, due to the fact the lakes in the ACF Basin below Lake Lanier are full or minimally below full pool, while Lake Lanier is almost 20 feet below full pool. This is not due to the drought or over use of water by the public in Georgia. When recent rainfall calculations are totaled, compared to the amount of water released, the Lake should only be down some 3-5 feet. This is due to mismanagement of the releasing of water. Look at what is going on downstream, not what the Manual says. If the downstream areas are full, decrease the outflow.

2) The Water Control Manual for Lake Lanier should be adaptive and flexible to meet the ever changing water needs due to climatic changes and population growth. If outflow needs to be determined on a daily basis then the Manual should reflect that. Full pool at 1073 feet above sea level, and minimal levels, that should only be allowed to drop to 12 feet below full pool, should be set and reviewed at certain intervals. No one person or entity should operate on the basis of "just because the Manual states that", especially if that Manual is dated and does not reflect the changing times. A thinking, logical mindset must be put into action in controlling the outflow and full pool and minimal levels of Lake Lanier. This is a very valuable resource, and should be treated as such.

3) A contingency plan should be in place for any oversight by the Corps, i.e. when 3 feet of water was let out this past year, how does that get replaced?

4) Do not base decisions on outflow from the Lake based on any "so called" endangered species. First of all, the mussels they claim are endangered have lived for several hundred, if not thousands of years before the dam was built, and they survived. Their survival is in no relation to Lake Lanier's water flow. That includes any other endangered species. There needs to be documented studies before any flow adjustment from the Dam can be made for any species of animal downstream. It needs to show how they lived before the dam, and if anything has truly changed since the dam has been built. And never should an endangered species, or anything else, be put ahead of actual people.

5) Minimal emphasis should be placed on transportation flow, power plants and other industries downstream when it comes to the well being of Atlanta and North Georgia. First of all, the lakes in the ACF Basin below Lake Lanier have been overflowing to just slightly below full pool. There is no need below the Dam; there has been no decrease in operation of industries downstream, unlike what is happening around Lake Lanier and in Atlanta. If the current rate of outflow continues, the Lanier Reservoir will be pulled so low that no one will benefit from it. When the area below the Dam is fairing better than the actual reservoir it is pulling form, the outflow needs to slow drastically or stop. Eventually there will be no outflow if the over flow of water from the Dam continues.

0505

6) The economic impact of keeping Lake Lanier full dwarfs any economic value or need out of North Florida or South Alabama. Make certain when these other states are claiming there is no water, that this is factual. We physically visited each Corps owned reservoir, power plant owned reservoir, and the rivers and streams in the ACF Basin during these past 2 years. Most are overflowing and only a few are slightly below full pool. With this being the case, why is water and why was water continually being released from Lake Lanier?

7) The full pool level of the Lake needs to be raised to 1073 above sea level due to the increase use of the water from the Lake, for drinking water and sewage disposal. Also, in dealing with these same factors, a minimal level at only 12 feet below full pool should be set where the Lake cannot be lowered past this level. These levels should be reviewed and adjusted at certain intervals.

8) Other reservoirs need to be considered in this overall planning scheme. The state of Georgia has discussed it many times, but to no avail. This needs to be considered since there is an abundant amount of water in North Georgia that could be tapped into. This should be looked at in Northern Alabama, as well as Northern Florida. Northern Florida should consider tapping from the ocean as it does in some areas of that state.

Thank you,

John and Jodi Wacho
6690 Turners Cove Road
Cumming, GA 30041
770-886-8262

If I may, I would like to tell my story of why the lake means so much to me. We moved here from Ohio 16 years ago. My husband took an early retirement from GM & we found our dream location here on Little River, Lake Lanier. We own a small house, by most standards, on the lake but our view from almost every room in our house was spectacular. We had a panoramic view of the lake. We always were so proud to show off Lake Lanier when our friends & family would visit us. It was a beautiful lake. We always felt that our investment in lake property would pay off in the future. Some day we will be forced to sell our home, too much maintenance, too many steps, our health will decline, one of us may pass away. We thought our investment in our home was one of our securities but now that has certainly changed. With the lake as low as it is & the fact that the outlook of ever having a full lake again is questionable, I have to wonder who will want to buy a home on a disappearing lake? I realize this doesn't really matter to the Corps but it matters greatly to us.

To my understanding, this is a meeting where we can voice our concerns regarding an update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) River Basin. This is a Manual that has not been updated for almost 50 years. It's hard to imagine what Lake Lanier was like 50 years ago, or Atlanta for that matter. Do we need some changes in the Manual, I certainly think we do. The demand for the waters of Lake Lanier have never been greater & it would be foolish to think that it will change. How can we sustain a full Lake Lanier & support all the demands that are requested from this seemingly dying lake? Is having Lake Lanier at a full pool level a thing of the past, only a memory to those of us who once enjoyed it that way?

I don't understand why our lake should be drained so we can support endangered mussels or any other species in the Apalachicola River. What was happening to them when the lake was not even a lake & there was no water to send down to them? We used to see lots of fish around our dock but this year with the low lake levels we hardly have any. The water seemed to be murkier than in the past, not as nice for swimming, I wonder if that is due to the lower lake levels as well. I remember years ago when we would get 3-4 inches of rain & the lake would come up 2'. That just doesn't happen anymore.

When we are in a drought situation, as we have been for the past 3 years, we need to have our water withdrawals lessened.

I definitely am in favor of raising Lake Lanier's full pool from 1071 ft to 1073 ft. Right now there is so much silt that has occurred that even if we were at full pool we would not have the same volume of water in the lake if we eventually reached our current full pool level.

Please take my concerns into consideration & do whatever you can to insure that someday we will have the lake back to a full pool level, a lake to be enjoyed by all.

Thank you,

Marilyn Haight

Marilyn Haight
4016 Donna Dr.
Gainesville, GA 30506

Gmail by Google BETA

Vern Herr <vherr@acf-wcm.com>

Lake Lanier Management

1 message

traceergle@bellsouth.net <traceergle@bellsouth.net> **Fri, Nov 7, 2008 at 10:50 PM**
To: comments@acf-wcm.com

Please consider the following when making your plan to control the water in Lake Lanier.

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.
--

Trace Ergle, Managing Broker
Lakeside Realty LLC
327 Dahlonega St., Suite 1902A
Cumming, GA 30040
770-886-0898 Office
770-296-3457 Cell
678-807-2880 EFax

0508

Vern Herr <vherr@acf-wcm.com>

Manual Update

1 message

Robert Tate <rtate@possiblenow.com> **Fri, Nov 7, 2008 at 1:27 PM**
To: "Comments@acf-wcm.com" <Comments@acf-wcm.com>

To whom it may concern:

Please consider adding the following in the Manual Update:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank You for your consideration.

Rob Tate
Business Development Manager
4375 River Green Parkway
Duluth, GA 30096
Direct: 770.255.1234
Fax: 770.255.1025
rtate@possiblenow.com

www.dncsolution.com

www.possiblenow.com

With over 500 customers, PossibleNOW is the market share leader for Do Not Call and privacy preference management solutions. Our clients include leading companies in the teleservices, insurance, banking, real estate, and direct to consumer marketing industries. The company has an impressive customer list that contains many Fortune 500 and national “brand name” direct marketers.

0509

Vern Herr <vherr@acf-wcm.com>

Lake Lanier

1 message

D-Jay Petro <djaypetro@charter.net> **Fri, Nov 7, 2008 at 12:50 PM**
To: Comments@acf-wcm.com

Lake Lanier is the heart and soul of Gainesville, Ga. I have lived on the lake since I was 4 years old except for a few years after I got married. I saved until I was able to finally buy a piece of property on Lanier. That was 5 years ago. Today my dock sits on dry land and my value is about half what it was. We only built there for 1 reason. LAKE LANIER. Please help us protect our investments and our pride and joy.

Greg Smallwood

0510

Vern Herr <vherr@acf-wcm.com>

Lake Lanier Water Control Manual Update.

1 message

Muenchen, Michael <Michael.Muenchen@ejgallo.com> **Fri, Nov 7, 2008 at 12:21 PM**
To: "comments@acf-wcm.com" <comments@acf-wcm.com>

Please consider adding the the following in the Manual Update:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank You for your consideration.

Michael Muenchen

E & J Gallo Winery

Trade Development

Cell - 678-575-8099

michael.muenchen@ejgallo.com

0511

Vern Herr <vherr@acf-wcm.com>

Lake Lanier Water Control Manual Update.

1 message

big j <j.muenchen@comcast.net> **Fri, Nov 7, 2008 at 11:29 AM**
To: comments@acf-wcm.com

Please consider adding the the following in the Manual Update:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank You for your consideration.

John Muenchen
5750 Clinchfield Trail
Norcross, Ga 30092

email: j.muenchen@comcast.net

0512

Comment ID: 0512
Author Name: Will Daniel
Organization:

We must do whatever possible to restore lake levels in Lake Lanier. When in a historic drought we need to release less water from the dam, I also support moving the full level to 1073.
Thanks

0513

Comment ID: 0513
Author Name: Jansen
Organization: Riverfront Therapy Inc.

I believe the preservation of this great bay is essential to not just the economy here but it will inevitably influence all the visitors who come to our area for vacations. Most of the visitor are from Alabama and Georgia. Why can we not learn from other countries about water distribution plants. I was vacationing on an island called Bon Aire which is owned by the Dutch. They have NO fresh water source at all yet they provide for the entire island by means of a desalination plant. Huge mounds of salt are removed from the ocean water and provide clean fresh drinking water. Why can Georgia not take some land from their coast and pipe in water from the ocean and create a plant which can provide unlimited amounts? It can been done so perhaps government funding could to create an opportunity? It would create a new job market and there would be no arguing over who loses. Its a win win situation which could start a trend for California droughts!

0514

Comment ID: 0514
Author Name: Anita Grove
Organization: Apalachicola Bay Chamber of Commerce

The 5,000 cfs minimum flow from the Jim Woodruff Dam to the Apalachicola River is not sufficient to support water quality and water supply on the Apalachicola River. To maintain the health of the Apalachicola River and Bay a minimum of 8,000 cfs is required. The Apalachicola River and Bay have suffered greatly over the past 6 years due to limited fresh water flows on the Apalachicola River. We have noted great changes in the health of the river and the bay.

0515

Comment ID: 0515
Author Name: Anita Grove
Organization: Apalachicola Bay Chamber of Commerce

Residents on Apalachicola Bay have noted great changes in the health of the bay since the water flows have dropped below 8,000 cfs. The salinity of the bay has greatly increased. Populations of shrimp, flounder, blue crabs and other species has dropped dramaticaly over the past 2 years.

0516

Comment ID: 0516
Author Name: Robert Hilton
Organization: Homeowner

There is nothing left of the lake now. It will be years to partially recover from what has been released. Any little bit will help now. It has hurt the local economies and provided a dangerous situation for the boaters that are able to drop their boats in.

0517

Comment ID: 0517
Author Name: Scott Carper
Organization:

Please consider the following:

1. Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River. Human life and human flourishing should always take priority over anything else! It is appalling to think that mussels and sturgeon would be a priority over 4.5 million people.

2. During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1 each year.

3. Better and consistant management triggers must be in place for Lake Lanier withdrawals during times of drought.

4. Please consider raising Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank you.

Scott Carper
Alpharetta, GA

0518

Comment ID: 0518
Author Name: Raymond Smith
Organization:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

0519

Comment ID: 0519
Author Name: Brad Jordan
Organization:

Why not during the rainy season, the Corps not allow Lake Lanier to reach full pool? The corp should allow this to happen no later than June or July of 2009.

Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River and should allow such species to adapt... and they will.

Management triggers must be in place for Lake Lanier withdrawals during times of drought, such as raising Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Its time to address these issues once and for all!!!!!!!!!!!!

0520

Comment ID: 0520
Author Name: Michael P Harney
Organization:

This is a very severe situation. We need to approach this with an "out of the box" manner.

Corps should allow Lake Lanier to reach full pool no later than June 1;
There is severe property damage and home value errosion in an already difficult housing market./

Thanks, Michael H.

0521

Comment ID: 0521
Author Name: John ODonnell
Organization:

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1.

Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River, it should be possible to split this responsibilty between all of the lakes downstream from Lanier.

Management triggers must be in place for Lake Lanier withdrawals during times of drought.

Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

0522

Comment ID: 0522
Author Name: Tim Muenchen
Organization:

Please consider adding the the following in the Manual Update:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;

-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;

-Management triggers must be in place for Lake Lanier withdrawals during times of drought;

-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank You for your consideration.

Tim Muenchen
4004 Yarrow Bluff
Norcross, GA 30092
(404) 432-0359
tmuenchen@possiblenow.com

0523

Comment ID: 0523
Author Name: Jack Griffeth
Organization:

A recent study released by the Georgia Environmental Facilities Authority called for increased water conservation and expansion of existing reservoirs. While Georgia citizens are conserving and should continue to conserve water more than ever, Lake Lanier's capacity continues to shrink with every rainfall which erodes the exposed banks. The drought effect is compounded by the continued release of water through Buford Dam to sustain mussels downstream. The Lake Lanier cove I live on has fillied in dramatically with mud and silt during the past 2 years. The cove and hundreds like it are rapidly filling which is dramatically shrinking the reservoir capacity. I am an avid environmentalist who realizes this drought is severe enough to negatively impact the mussles even without Lake Lanier. The negative environmental effects of the Lake being so low seems to greatly outweigh the benefits of releasing the water. I hope the future mangement plan calls for Lake Lanier remaining at or near capacity for the better good.

Comment ID: 0524
Author Name: Palmer
Organization:

0524

As an area resident I am very concerned with the management of Lake Lanier water resources. We should manage the lake resources hoping for the best rain conditions but planning for the worst. With that being said, the corp should;

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River, it isn't reasonable for man to do what nature couldn't when it can quite likely endanger humans due to water shortage
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

I hope that you will consider these very practical, reasonable and cost neutral action items.

Best Regards,

Todd Palmer

Comment ID: 0525
Author Name: walt banasik
Organization:

0525

1. Must allow the lake to reach full pool no later than June 1
2. No draw down for mussels or other species in the Apalachicola river
3. A workable drought plan--no release during drought
4. Raise full pool to 1073 adding 26 billion gallons of water

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Comment ID: 0526
Author Name: Sam Boggs
Organization: citizen

0526

Follow Lake Lanier Assn's. suggestions especially 1073 level. Sam Boggs, citizen

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Comment ID: 0527
Author Name: Terry Simpson
Organization:

0527

I very much enjoyed the Meeting and demonstration held in Gainesville last week. I feel that I have a much better understanding of the system and its management requirements. In this light I would still like to see the recommendations of groups such as Lake Lanier Association and 1071 Coalition reflected in the new management plan. Specifically, I hope the plan will include provisions for raising the summer pool from 1071 to 1073, elimination of releases for endangered mussels in Appalachicola bay, more sensitive management triggers during drought conditions and a commitment to allowing Lake Lanier to reach full pool no later than the first of June each year. Thank you all for your continued hard work and attention to this difficult problem.
-Terry Simpson

Comment ID: 0528
Author Name:
Organization: Resident

0528

We hope that the corps will consider the following comments:
During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1.
That Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River.
That management triggers must be in place for Lake Lanier withdrawals during times of drought.
That the Lake Lanier full pool levels be raised from 1071 ft. above sea level to 1073 ft., thereby adding an additional 26 billion gallons of water to the lake.
Thanks you for considering these comments.

Comment ID: 0529
Author Name: Tim Altman
Organization: Timberidge on Lanier Condominum Association

0529

We must maintain this water source for consumption, wild life and recreation. What is the impact of millions of gallons of waste added to a smaller water base? Would the waste permits be approved based on a water level below 1530, 1520?
The bottom line is that a better job must be done in protecting this resource, specifically;
1)During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
2) Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
3) Management triggers must be in place for Lake Lanier withdrawals during times of drought;
4) Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Regards,
Tim

Comment ID: 0530
Author Name: Lisa H. Howell
Organization:

0530

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.
-Come up with better siltation options to help keep silt from entering lake from construction sites.
- Address issues with City of Cumming releasing water into Lake Lanier from their Water Treatment plant. This has become a major siltation issue in the past several years and has caused our cove to lose over 6 feet of water (gaining 6ft of silt). (GA 400 Bridge / Bald Ridge area)
-Consider dredging the cove at the GA 400 bridge and addressing the siltation issues that have arisen from the construction and water treatment plants. Their unexcused neglect to the lake and it's value has created an eye sore. The City of Cumming and the County of Forsyth should want to make this location on the lake look better due to the fact that is the only true major Hwy./Interstate that shows Lake Lanier.

Regards,
Lisa Howell
404-309-8889

Comment ID: 0531
Author Name:
Organization:

0531

The Corp needs to try and have lake a full pool at least by the end of May and tne lake should not be drawn down to send water down stream to the Appalachicola River. Also full pool should be changed to 1073. It is very sad what is happenig to our lake at this time.

Comment ID: 0532
Author Name: Jim Geist
Organization:

0532

I was out of town on business on October 29th and was unable to attend the public meeting that was held in Gainesville. At the last public meeting, which was a couple of years ago I tried to make the point that the water shed that flows into Lake Lanier was simply geographically too small to meet any reasonable projected water needs for the relatively huge geographical area that Lake Lanier is asked to support.

Based on this fact alone, disregarding the current draught, the water shortage that we are currently experiencing that is attributed to the draught, was an inevitable occurrence that I suggested and continue to suggest can only be alleviated with a significant increase in the water reservoir capacity within the system which would allow for a significantly more sensitive release of water from Lanier based on a minimal lake level and lake inflow.

I know that raising the full pool level of the lake from 1071 to 1073 has been put on the table. Admitting that I am not knowledgeable of the full consequences of this action I would suggest that even a high level, maybe 1075 be considered.

Secondly, additional reservoirs (plural) should be created down stream. Again I admit I have not done and site selection work, but at least two more reservoirs in Georgia south of Atlanta, two possibly three in Alabama and two in Florida would allow for the retention of rain from a much greater area then what is currently available. This year is a great example of where we have allowed billions of gallons of water to run into the Gulf of Mexico from rain that fell south of Atlanta while the drought in the water shed has persisted and now that the rain south of us has seasonally slowed down the system looks to continue to pull down the lake at an unsustainable rate. This is an avoidable situation.

We need to spread the responsibility for meeting the needs of the mussels survival and the economic needs of the Apalachicola oysters to include these other areas. If the drought goes away tomorrow and demand continue to increase without the significant increase is storage we will contend with this condition over and over again and at some point, when another drought occurs even emptying Lake Lanier will not meet the increased needs.

I would personally request that at some level, above our current level, that the amount of water released be limited to the amount of water coming into the lake. If the lake did not exist, that is all the water that would be available. Needs in excess of this should be meet from additional storage capacity.

I dont think that any of what I have written is new, but at the end of the day is there any other long term solution, other then a meaningful increase in our storage capacity?

Thank you
Jim Geist

Comment ID: 0533
Author Name: Jeanne Beachler
Organization:

0533

We are very concerned with the water levels in Lake Lanier and propose the following:
-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

0534

Comment ID: 0534
Author Name: Ebby Hamby
Organization:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
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-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

0535

Comment ID: 0535
Author Name: Stacy Wade
Organization: LLA

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.-
-If this isn't acceptable, why don't you repair the ramps, enabling people to put boats in the water and enjoy the lakes for fishing, or pleasure.

Comment ID: 0536
Author Name: Ellen Whitaker
Organization:

0536

I am a member of the Lake Lanier Association and have lived on Lake Lanier for 10 years. When I was offered a job to move to Georgia from Ohio my husband got out a map of the state and said we will only move there if we can live on this lake and he pointed to Lake Lanier. Based on that I believe:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Comment ID: 0537
Author Name: Charles Mann
Organization:

0537

1-I believe a study needs to be done to determine how much impact the outdated Atlanta sewerage treatment system contributes to the lake level.
2-I don't believe that one of the purposes of the lake was to support Mussels. How did the Mussels survive before the lake was built? I am not even convinced that they are endangered.
3-If the full pool level is increased to 1073, it would be a tremendous amount of water in reserve to help with downstream requirements during droughts.

0538

Comment ID: 0538
Author Name: George N. Slappey, DDS
Organization:

Thanks for the opportunity to input.
Please raise Lanier's full level tto 1073! It is so overdue! This lake should reach full pool by early summer always. And the corps should have included in the manual guide lines to hold back reduction of water here during drought. The native species of wildlife in th downstream rivers should take a back seat to the needs of mankind! This is a workable thing, it just cannot be accomplished with 50 year old guidelines.....good luck and we need help badly and real soon. Respectfully offered,
George Slappey, DDS

0539

Comment ID: 0539
Author Name: Ken Fields
Organization:

Allow Lake Lanier to reach full pool not later than June 1.

The Lake should not be drwn down for mussels or other species in the Apalachicola River as they are entitled to the water they were receicing prior to the Lake being built.

Triggers MUST be in place for withdrawals during times of drought.

Raise Laniers full pool from 1071 to 1073. We will need the additional water.

0540

Comment ID: 0540
Author Name: Charlie Nugent
Organization:

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

0541

Comment ID: 0541
Author Name: Donald C Pauley
Organization:

1. Lake Lanier should be allowed to rise to 1073 feet by June 1 each year.
2. Water should not be released solely to support fresh water muscles or other so called endangered species downstream.
3. Water should not be released to support clarity requirements of downstream users. Down stream users should be required to build storage facilities, better filtering facilities or develop other sources to use during storm conditions that provide them adequate water that is not of sufficient clarity.

0542

Comment ID: 0542
Author Name: John E. Webb
Organization:

I understand the need to produce hydro power but I think that it should be limited to the release of water which is already being released from the Buford Dam and Lake Lanier watershed.

0543

Comment ID: 0543
Author Name: Lee Bitzer
Organization:

I understand that you are trying to share this water with all, how ever the rules that you are and have been using make no sence today. True we have been in a drought for the last several years, but you have done nothing!!!!
What has to be done to wake this goverment agency up ????? Haveing to take years to rewrite a manual to change the way you operate after looking the other way for years is poor.
You had to see what was happening to this area over the years buy you chose to NOT ADDRESS it.
Lets cut through the RED TAPE and do the right thing NOW befor its to late.
Thanks for letting me vent and hope you will take action.

Lee Bitzer

0544

Comment ID: 0544
Author Name: Raymond F. Egan
Organization:

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.
Consider additional reservoir down stream with the specific responsibility to maintain the water levels to support the needs of river shipping.

0545

Comment ID: 0545
Author Name: John E. Webb
Organization:

The Apalachicola Bay is directly tied to the Gulf of Mexico, and Mussels can and will move their habitat to whatever water level is available. There is more water in Florida then there is in Georgia, Alabama, South Carolina and Tennessee combined.

Comment ID: 0546
Author Name: John E. Webb
Organization:

0546

Lake Sidney Lanier has suffered from the Drought for the past 5 years, the inflow of the lake should be tied directly to the outflow. The uses downstream eventually benefit from the release of water.Full benefit by all parties must start at the beginning of the basin, if the Lake Lanier project is allowed to remain at the bottom of the pool the people who use the lake for business and pleasure suffer from undue hardship. Recreational use of the lake has inspired me to work harder for the past thirty years in order for me to have the money to pursue my hobbies of boating and fishing. My time on the lake is calming, inspiring and at times spiritual. The money spent by people who use this lake directly benefits the people of our community, it creates jobs and adds millions of dollars to our local economy.

Comment ID: 0547
Author Name: John E. Webb
Organization:

0547

Hundreds of people in our community Gainesville, GA, have lost their jobs as a direct result of the lake level being so low. Thousands of potential users of the lake have stayed away because of the lack of access to boat ramps, and the potential dangers from objects which are barely under the water.

0548

Comment ID: 0548
Author Name: John E. Webb
Organization:

If you compare the average annual rainfall received by Mobile and Mobile Bay to the rainfall received by Gainesville, GA you would want to start pumping water North instead of demanding that more water be allow to flow south.

0549

Comment ID: 0549
Author Name: John E. Webb
Organization:

If there were no dams on the rivers between North Georgia and the gulf of Mexico, how long would the mussels survive during a drought? You can't control the amount of rainfall, only Mother Nature can, and somehow all species adapt.

Comment ID: 0550
Author Name: Todd Bitzer
Organization:

0550

Please be advised that it is my opionion that the Corp needs to revised it's plans and operations for Lake Sidney Lanier. During drought conditions (as has been the case for the past several years) the release program needs to be revised to limit water out flow as to protect lake water levels. Additionally, we should incrase the full pool level of the lake to add further protection in the event of future drought conditions. I would alos suggest that these measure be added asap inorder to protect the business and recreation activities of this region. Low water level have a significant impact on the economy of this area.

Comment ID: 0551
Author Name:
Organization:

0551

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Comment ID: 0552
Author Name: Leo and Marie Anne Van de Vall
Organization:

0552

Dear Corps of Engineers,

- Please,allow Lake Lanier to reach full pool no later than June 1during the rainy season;
-please, don't drawn down Lake Lanier for mussels and other endangered species in the Apalachicola River;
-Please, have management triggers in place for Lake Lanier withdrawals during times of drought;
-Please, raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank you so much.

Leo and Marie Anne Van de Vall

Comment ID: 0553
Author Name: Michael W. Briggs
Organization:

0553

Why is water released from Lake Lanier when it is almost down 20 feet when the Levels of other Lakes South of Lanier(such as West Point only 5 feet down) have more water?

Comment ID: 0554
Author Name: John Gundlach
Organization:

0554

I don't understand how Alabama and Florida can honestly place a claim on Lake Lanier and the watershed above it. In the whole ACF basin, Lake Lanier represents about 5% of the entire watershed area. Why are they so greedy that they feel like they should have a stake in the very small basin that supports the largest city in the southeast? Our economy, recreation and aquatic life have been seriously threatened and many thousands of Clams have died because of their greed to lay claim to our water. All the lakes south of Lanier have been full the entire year. It's time to respect the economy, residents and Lake Lanier's natural environment and fill the lake back up and let us claim the very small area of the ACF basin that we occupy. We don't have the luxery of a northern reservoir to fall back on in case our's runs dry, the southern reservoirs do and it's time to fill ours back up and use some of their waters if it is felt that the mussels and sturgeon need extra water. I wonder what the mussels and sturgeon would have done if these reservoirs would have never been built??? I'm sure they would have found a way to survive like all other Gods creatures.

Comment ID: 0555
Author Name: John Gundlach
Organization:

0555

I feel that the waters being released from Buford Dam should be dramatically reduced during times of rain, since there is plenty of runoff into the Chatahoochee River.

This should be a part of the water management update.

Comment ID: 0556
Author Name: Guy Caldwell
Organization: PossibleNOW

0556

Please consider adding the following in the Manual Update:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thank You for your consideration.

Comment ID: 0557
Author Name: Terry Donnenwirth
Organization:

0557

We believe that during the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1. Lake Lanier should not be drawn down for endangered species in the Apalachicola River. We were in Alabama and Florida this summer and observed that they were not low on water as we were. The Chattahoochee River seems to be always almost to the overflow mark now. It used to go up and down with the seasons. When it rains, the dam should be closed to allow the natural rain to flow and not be wasted.
Management triggers must be in place for Lake Lanier withdrawals during times of drought.
We also believe the Lanier full pool should be raised to 1073 ft. adding water to the lake. The quality of the water in the lake now is terrible where we live. I believe it could even be unhealthy for all.
Please make responsible policies for Lake Lanier, considering the standard of living around the lake, the lack of jobs and the unhealthy environment which has been caused by the present policies. Thanks.
Terry Donnenwirth

Comment ID: 0558
Author Name: mike
Organization:

0558

manual not updated since 1958? since then, how many lake have been created down stream??

Comment ID: 0559
Author Name: Roy Beavers
Organization:

0559

Gentlemen, as a concerned landowner adjacent to the lake I an deeply concerned about the situation at Lake Lanier. The lake should not be drawn down for mussels and other endangered species in the Apalachicola River. These species should be resilient enough to endure drought conditions and excessive withdrawal from Lanier artificially creates a non-natural environmental condition for them. During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1st. Specific management triggers must be in place for Lake Lanier withdrawals during times of drought to minimize the effect on the entire area. I also support any efforts to raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft I understand that the additional volume would be in the neighborhood of an additional 26 billion gallons of water to the lake. This can only help the overall effectiveness of the lake and every area downstream, expecially during times of a rain shortfall. Also, areas between Lakier and the Gulf should be encouraged to construct additional reservoirs as outlined in the plans that date back to the 1960's. These additional bodies of water could also minimize the effects of a drought on the entire region.

Comment ID: 0560
Author Name:
Organization: Windsong Sailing Academy

0560

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;

-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;

-Management triggers must be in place for Lake Lanier withdrawals during times of drought or low water levels;

-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

-Permit dredging and removal of hazardous shallows/shoals in the primary thoroughfares thus adding additional water capacity to the lake and making the lake safer to navigation.

Comment ID: 0561
Author Name: Jay Martin
Organization:

0561

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Comment ID: 0562
Author Name:
Organization:

0562

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

this will be a win win for everyone.

Thanks for your consideration.

Comment ID: 0563
Author Name: David Long
Organization:

0563

An issue that seems to never come up is the loss of life and property damage that occurs when the lake is at low levels. Just read the news from this past summer on folks who walked off drop offs thinking the level at swim areas was smooth.

Also never considered is the millions of dollars of lost property value in lake homes and businesses.

Come on, unedible mussels in Florida? What is the Federal Government doing when faced with a serious financial situation? They are getting involved and helping. Lake Lanier is a major, I repeat major, ecconomic impact on North Georgia. We should have the same attitude about it.

David Long

Comment ID: 0564
Author Name: S.M. Chassner
Organization:

0564

My family, which lives on Lake Lanier, advocates:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;

-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River; Florida is swimming in water due to hurricanes. Why are we still suffering?

-Management triggers must be in place for Lake Lanier withdrawals during times of drought;

-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

-Lazy Days Marina has significant erosion, since they cut many mature trees and filled in the basin.

Comment ID: 0565
Author Name: Haywood Smith
Organization:

0565

As a 35-year resident on the shores of Lake Lanier, I wish to state that the primary purpose for our lake should be as a reservoir for drinking water and sanitation needs here and downriver. Though I am well aware of the commercial impact this might have on those downriver, I ask merely for some common sense concerning our citizens.

The lake's source originates in Georgia watershed. Let us keep what we need to provide safe drinking water and sanitation for our state's citizens. Any surplus can be made avaliable to others.

As far as power generation, I wouldn't mind that so much if the power weren't sold to other regions. Did the power company build the dam? Are they not licensed by you to generate power? I want a healthy lake, for my children and my grandchildren, and draining away our water supply to power other regions seems like preferential treatment for a private commercial enterprise.

I spoke with an eminent meteorologist about the change in the weather, and he stated unequivocably that the current change in weather patterns is due to a solar cyclethat could last for a long time, a cycle that has been repeated in our planet's history at fairly regular intervals. We have been due for one for some time, and this drought is part of it. Please assess the lake's purpose based on human need--not wants--as we face these climate challenges.

Another environmental concern: Our trees are dying from the drought. When they fall--and they will if this situation continues--we will be losing a significant element of our region's capacity to clean the air. If there is more water, we can use reasonable methods to keep the ecological balance in the natural cycle of air and water cleansing.

Another concern I have is for the health of Lake Lanier. The Corps has told us that at full pool, the lake is safe to use and cleans itself. Swimming did not put us at risk, and fish were safe to eat. At these low levels, that is not the case. My son and grandchildren live on the lake beside me, and I am concerned for their health.

I have long been "green" when it comes to water conservation. I use rain barrels and cisterns to irrigate my vegetables and plantings. I haven't watered my lawn in two years. I use low-flow fixtures and appliances. I'm all for good conservation of our resources, and I hope the Corps will consider basic human needs above commercial ones.

Thank you for your consideration of my comments.

Haywood Smith

0566

Comment ID: 0566
Author Name: Tom Riggle
Organization:

Our home has been on Lake Lanier for the last 18 years. This was a beautiful lake until the last two years. The way is is now is just sickening. What has happened to this jewell of Georgia?
It seems that what has happened is that people downstream have developed communities and projects and then said, OK, now we must have the water to support what we just built. Well, nature plays the key role in this. If nature doen't provide, then we all should be impacted the same way. Stop the continue release of water now and don't release any water until the lake reaches 1073. Then,basicly, only release the amount of water that comes in as natures provides. Allow a fluctuation of not more than two feet. If the level drops to 1071, no more releases beyond what comes in each day. That would restore the natural flow.
The lake should not be managed to provide for the survival of endangered species. If nature does not provide the water naturally, then the species in the basin should be affected naturally. If they die, so be it. That's what would have happened under the natural plan.

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October 20, 2008

Col. Byron Jorns
Commander
Mobile District Corps of Engineers
Attn: CESAM-DE
P.O. Box 2288
Mobile, Al. 36628-0001

RE: Apalachicola-Chattahoochee-Flint Water Control Manual and Environmental Impact Statement preparation – Comments from Gwinnett County, Georgia

Dear Sir:

The purpose of this letter is to transmit to you our comments and input concerning your office's preparation of the Environmental Impact Statement and evaluation of alternatives for the preparation of the "….update and revision of the water control manuals for the Apalachicola-Chattahoochee-Flint (ACF) River Basin" per the Federal Register notice dated February 22, 2008 and the Mobile District Newsletter dated October 8, 2008. As we read the EM 1110-2-3600, the Corps of Engineers (COE) are required per Section 3-2 d. to involve input from other agencies of the Federal government, as well as state and local authorities, public utilities, and other groups that are involved in the environmental and public use function of project regulation.

As the provider of drinking water for the health and safety of nearly 800,000 people in Gwinnett County and some adjacent areas and the fact that our raw water intakes are directly in Lake Lanier, we have a vital interest as to how Lake Lanier and the ACF system is operated. Because of this vital interest, our Water Resources Department staff has closely monitored your operation of Lake Lanier and the ACF system since the start of the ongoing drought in north Georgia in 2006 and up to the current status of the water levels in Lake Lanier.

We are firmly convinced that the Interim Operation Plan and the modifications to it that have been made by the Mobile District have not resulted in the most efficient operation of the system to serve its designated uses and the public interest. We believe that the Interim Operation Plan required the COE to release much more water from storage than was necessary during the fall of 2006 and throughout much of 2007. We believe that a more conservative and equally effective operation of the ACF system could have saved millions of gallons of storage in Lake Lanier and still met the downstream requirements throughout this prolonged drought.

The COE EM 1110-2-3600 Section 3-3 b. (1) states "Furthermore, for many projects that have been operational for a number of years, the water control plans and water control manual are out-of-date, and there is a need for revising them to make them applicable to current conditions." We believe that everyone will concur that things are not the same in north Georgia as they were when Lake Lanier was built. The water control plans and the water control manual need to address the current conditions in which we find ourselves with some three million people in the Metropolitan Atlanta area relying on the ACF basin for drinking water for their health and safety. Section 3-3 b. (2) states "The new data may also include records of significant events of extreme conditions of flood or drought which may require modification of the water control diagram." The droughts of 1988, 2001 and the present drought should surely suggest that the COE should make every effort to conserve storage in the uppermost lake in the system to the maximum extent to enable the system to meet its downstream requirements in times of severe drought. Composite storage for the entire system should not be used to justify releases from Lake Lanier because Lake Lanier represents almost one half of the storage for this basin as its uppermost reservoir but that reservoir has only six percent of the basin's drainage area and controls only nine percent of the flow in the basin. Robbing Peter to pay Paul in this manner is not in the public interest where Peter's ability to recover is so limited.

The EM 1110-2-3600 3-3 d. (3) states in the second sentence "The studies may be used to simulate the regulation of projects on a foresight rather than hindsight basis by using derived or synthetic forecasts of project inflows." Therefore, we highly recommend that you use the methods of hydrological forecasting developed by the United States Geological Survey and recommended to you by the Atlanta Regional Commission. We also incorporate in these comments the letter to Mr. Curtis M. Flakes of your office and Ms. Gail Carmody of the U.S. Fish and Wildlife Service dated May 29, 2008 (enclosed).

The EM 1110-2-3600 3-6 c. (1) states "In addition to the basic economic functions for which the projects were originally authorized and constructed, water management goals now include environmental and social aspects of project regulation. This conforms to public laws dealing with water related activities that were enacted after the authorization of most water control projects. These laws require inclusion of certain aspects of environmental, fish and wildlife, and recreational uses in the management of the projects, or improvement of the environment of the rivers downstream through project regulation."
We suggest that keeping Lake Lanier as full as possible meets these goals and helps protect the environment and the economy of north Georgia. We do not believe that the Mobile District's Interim Operations Plan and its modifications meet these goals as required by the COE rules.

In addition 33 CFR 222.5 (f) (4) states "Development and execution of water control plans will include appropriate consideration for efficient water management in conformance with the emphasis on water conservation as a national priority. The objectives of efficient water control management are to produce beneficial water savings and improvements in the availability and quality of water resulting from project regulation/operation. Balanced resource use through improved regulation should be developed to conserve as much water

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as possible and maximize all project functions consistent with project/system management. Continuous examination should be made of regulation schedules, possible need for storage reallocation (within existing authority and constraints) and to identify needed changes in normal regulation. Emphasis should be placed on evaluating conditions that could require deviation from normal release schedules as part of drought contingency plans (ER 1110-2-1941)."

We do not believe that the present Interim Operations Plan and its modifications follow this COE rule. We believe that had this rule been followed in developing the Interim Operations Plan, the COE could have met the downstream needs and preserved the storage in Lake Lanier to a much greater extent than has been done in the last two years.

We believe that the technical expertise exists, if properly utilized, that would enable the Mobile District to craft a Water Control Plan that meets all of the needs of the basin and allow the reservoirs to be full or near full each spring in order to allow the system to be able to provide drought sustainability when needed as required by the COE
Engineer Regulation 1110-2-1941. Such conservation of storage serves the public interest and sustains the environment and population dependent on this vital resource.

In summary we strongly urge the Mobile District to seriously consider the methodologies suggested by the Atlanta Regional Commission and its consultant, HydroLogics, Inc. for alternate methods of operating the system. HydroLogics has shown that alternate operating scenarios can meet all downstream requirements and at the same time maximize reservoir storage during the wet season to ensure that we have the maximum storage on hand in the spring of each year, particularly in Lake Lanier, to provide for water conservation, drought contingency and the needs of fish and wildlife, recreation and environmental improvement/protection of Lake Lanier and the downstream basin.

Sincerely,

Charles E. Bannister
Chairman

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Mike Comer
Lynn Smarr
Jim Scarbrough
Council for Quality Growth
Gwinnett Chamber of Commerce
Randy Meacham/Gwinnett Municipal Association
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Pat Stevens/ARC
Kit Dunlap/Metropolitan North Georgia Water Planning District
William Droze/Troutman Sanders
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Tetra Tech, Inc/107 Saint Francis St., Ste. 1403, Mobile, AL 36602-9986

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Mr. Curtis M. Flakes
Chief, Planning and Environmental Division
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U.S. Army Corps of Engineers
P.O. Box 2288
Mobile, AL 36628-0001

Ms. Gail Carmody
Supervisor, Ecological Services
U.S. Fish and Wildlife Service
1601 Balboa Ave.
Panama City, FL 32405-3721

May 29, 2008

Re: Proposed Modifications to Interim Operations Plan for ACF Reservoirs

Dear Mr. Flakes and Ms. Carmody:

I offer the following comments on the Corps' proposed modifications to the Interim Operations Plan ("MIOP") for its reservoirs in the Apalachicola-Chattahoochee-Flint ("ACF") River Basin on behalf of the Atlanta Regional Commission, the City of Atlanta, Georgia, Fulton County, DeKalb County, Cobb County-Marietta Water Authority, and the City of Gainesville, Georgia (collectively, the "Water Supply Providers"). Technical materials prepared by Megan Rivera, Ph.D. of Hydrologics, Inc. and George McMahon, Ph.D. of Arcadis are also attached.

First, let us begin by expressing our sincere appreciation to you and your respective agencies for your efforts to manage water resources in the ACF Basin. Although we strongly disagree with many of the decisions that have been made, and with the process used to make them, we do understand that you are using your best efforts in an extremely difficult situation.

The following comments are organized in two sections. The first section is directed at specific provisions of the MIOP. The second addresses a number of more fundamental considerations that need to be considered in the development of the new Water Control Plan for the ACF Basin.

To summarize our evaluation of the MIOP, we believe that, while it represents a slight improvement over the original IOP, it suffers from many of the same fundamental flaws. We have already shown that better alternatives exist. We urge you to give serious consideration to these alternatives rather than continuing to make incremental changes to a plan that should never have been adopted in the first place.

Indeed, we are extremely concerned that the MIOP will form the basis for the Water Control Plans that are currently in the process of being developed. We can and must do better. In other words, although we understand that we will likely have to live with the IOP/MIOP framework for some time to come, we believe this framework should be set aside at the first opportunity.

40 COURTLAND STREET, NE, ATLANTA, GEORGIA 30303 404 463.3100 FAX 404 463.3105 WWW.ATLANTAREGIONAL.COM

1. Comments on Specific Provisions of the MIOP

1.1 Refill Opportunities Are Still Too Limited

As the events of the past year demonstrate, the IOP's minimum flow requirements and restrictions on the Corps' ability to store water are unsustainable during a prolonged drought. The MIOP alters these provisions in several ways, and in this respect, constitutes an improvement over the IOP. Indeed, the modifications allowing storage of all flows above 5,000 cfs from December to February and reducing the prohibition on storage to 50% of Basin Inflow are welcome changes.

However, these modifications do not go far enough. Refill opportunities are still severely restricted during the wet period from March to May and the 50% prohibition on storage is too restrictive. The MIOP ensures that reservoir levels are consistently lower than is beneficial to many users in the system. These provisions can and should be modified to allow greater opportunities to refill the reservoirs. This would substantially benefit the reservoir system, and all those who rely upon it, with little to no effect on downstream flows.

Florida would have the Corps believe otherwise. In its letter dated May 15, 2008, Florida complains that release requirements for certain periods have been reduced under the MIOP to 50% of Basin Inflow, as opposed to 70% of Basin Inflow under the original IOP. As a result of this change, Florida claims that "flows to the Apalachicola River will be reduced by up to 20% of basin inflow under the Modified IOP in comparison to the original IOP." This is simply not correct.

The reality is that only a small fraction of Basin Inflow can actually be captured in storage, regardless of what the MIOP might allow. The fraction of Basin Inflow that can be stored depends on the distribution of inflow in relation to storage. Of the 17,230 mi.^{2} drainage basin above Lake Seminole, 95% is below Lake Lanier, which represents 65% of total system storage; 80% is below West Point, which, together with Lake Lanier, represents 85% of total system storage; and 57% is below Walter F. George, which is the last storage project in the system. *See Figure 1.* In other words, run-off from 57% of the basin cannot be captured in any reservoir and 80% of the basin is controlled by the smallest storage project in the system, with only 244,000 acre-feet.

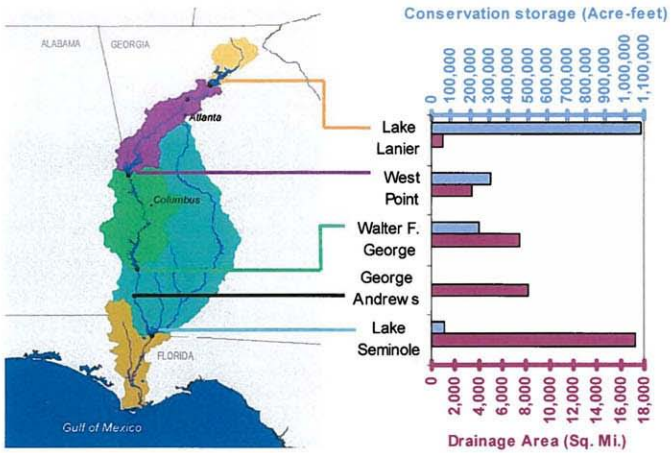

Figure 1. Conservation Storage and Drainage Basin for ACF Reservoirs.

The end result is that only a small fraction of Basin Inflow can actually be captured and stored in the federal reservoirs, because of their location in the basin, no matter what the rules theoretically allow. For example, for the period from January 2007 to present, the MIOP provision allowing storage of up to 50% of Basin Inflow would result in the actual storage of only 8% of Basin Inflow—the remaining 92% would pass downstream to Florida. Similarly, for the period from 2003 to 2004, the Corps would actually be able to store only 1% of Basin Inflow under the MIOP, whereas 99% would be passed downstream to Florida.

Because the Corps' ability to store water is so limited, the provision of the MIOP theoretically allowing storage of up to 50% of Basin Inflow cannot significantly impact flows in the Apalachicola River. Figure 2 through Figure 4 illustrate this point by comparing flows at the Chattahoochee gage under the IOP with those under the MIOP for three 2-year periods.[1] As these figures show, changes in storage limitations under the MIOP have virtually no effect on flows at the Florida line.

[1] All simulations discussed in this letter were prepared by Hydrologics, Inc. using the OASIS platform. Information concerning the validation of this model against HEC-5 is provided in Exhibit A. The models produce essentially the same results when the same assumptions are used. OASIS was used in preference to HEC-5. We would be happy to answer any questions that the Corps or Fish and Wildlife Service might have about these model runs.

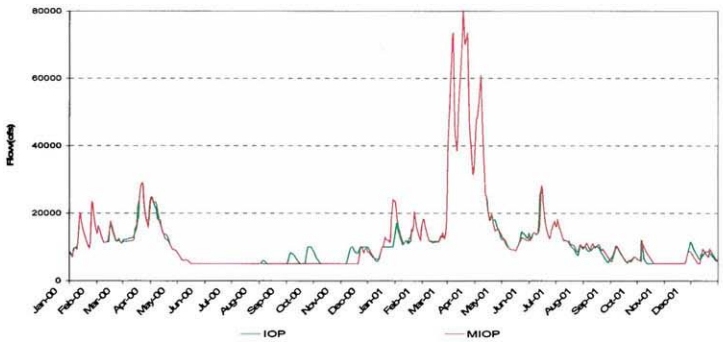

Figure 2. Comparison of flows at the Chattahoochee gage under IOP and MIOP for period from January 2000 through December 2001.

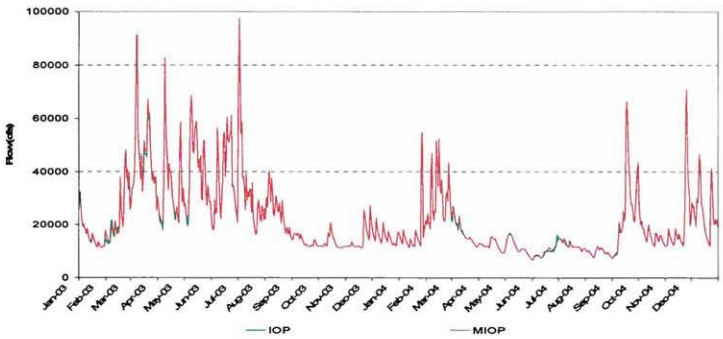

Figure 3. Comparison of flows at the Chattahoochee gage under IOP and MIOP for period from January 2003 through December 2004.

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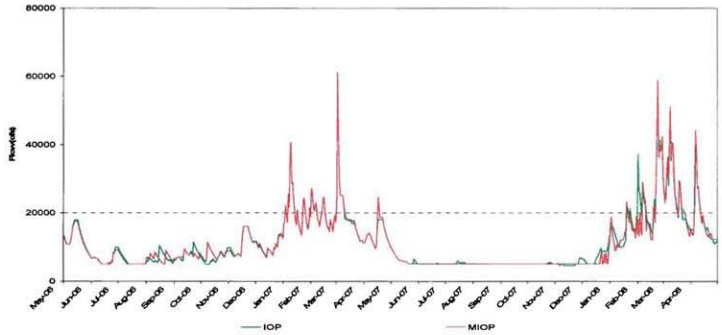

Figure 4. Comparison of flows at the Chattahoochee gage under IOP and MIOP for period from May 2007 through April 2008.

From this, two things are clear. First, Florida's argument that the MIOP will result in significantly reduced flows in the Apalachicola River is plainly not correct. Second, the Corps can and should utilize every opportunity to store water when such opportunities arise—and, given the placement of storage within the basin, such storage will have little appreciable effect on flows at the Florida line.

1.2 Down-Ramping Rates Are Unnecessary and Unreasonable

The ramping restrictions in the MIOP revert back to the rules set forth in the original IOP, which had previously been modified with the approval of the United States Fish and Wildlife Service. We believe the modified ramping restrictions approved by USFWS on October 19, 2008 were more appropriate.

The ramp-down restrictions in the MIOP require the Corps to release large amounts of water from storage to "smooth out" the natural variations in stream flow that occur when it rains. Instead of storing water associated with rainfall events, as it could and should, the Corps is instead required to release substantial amounts of water from storage to provide a gradual ramp-down from the high flows that result from these rainfall events. The result, at times, has been that rainfall events may actually *reduce* storage rather than increasing it.

This is not appropriate. Ramp-down requirements should not be imposed to reduce the rate of fall of the river after a natural rainfall event. Rather, ramping requirements should only be used to transition between significant man-made alterations of the flow regime, such as between spawning and non-spawning flows or between navigation releases and normal operations.

The modified ramp-down restrictions in effect since October 2007 took these considerations into account. As we understood that rule, ramp-down restrictions were tied to the "Basin Inflow fall rate" rather than to the IOP maximum fall rate schedule. The one problem with the rule approved by the Service in October 2007 is that it might be necessary at times to ramp-down even when Basin Inflow is rising or remaining steady. Therefore, we suggest that the fall rate should be the *maximum* of (1) the Basin Inflow fall rate; or (2) the maximum fall rate schedule.

1.3 The "Volumetric Balancing" Scheme Is So Restricted as To Be Useless

Although the Corps originally stated, when it adopted the IOP, that it would employ "volumetric balancing" to recapture storage that is used to meet ramp-down requirements. The limitations stated in the letter to the Fish and Wildlife Service dated May 16, 2007 essentially negate this commitment.

The letter includes several conditions that must be met for storage credits to accumulate: (a) the actual release must be greater than the minimum required by the IOP; (b) the release required to comply with the fastest ramping rate allowed is greater than the minimum IOP required release; (c) today's release is less than yesterday's release (i.e., downramping is occurring); and (d) today's total storage is less than yesterday's total storage. When all of these conditions are met, the credit is equal to the *lesser* of (a) the decline in storage; or (b) the difference between the actual release and the minimum IOP required release.

We can think of no logical basis for limiting the accumulation of storage credits to situations where system storage is actually declining. A restriction preventing the accumulation of storage is no different from a requirement to release storage.

Two other aspects of the volumetric balancing scheme are particularly problematic. First, the letter states that volumetric balancing must be accomplished within 10 days and may not involve more than 10,000 day-second-feet (dsf) of storage. There is no basis for these temporal and volumetric limits. If the Corps is required to expend large quantities of storage to slow artificially the river's natural rate-of-fall, it should be permitted to recoup that storage as flows permit. Second, "credits" can only be used during high-flow periods (above 10,000 cfs). At such times, storage credits simply serve to refill the lower reservoirs a few days earlier. As a result, the storage that is "saved" by applying volumetric credits is "spilled" a few days later when the reservoirs are full.

These limitations render the volumetric balancing scheme essentially worthless. For example, by our calculations, ramping requirements caused approximately 90,000 acre-feet of water to be released in excess of IOP release requirements from May to October 2007. Of this amount, only 3,000 acre-feet could have been recovered through volumetric balancing in accordance with the restrictions imposed by the May 16, 2007 letter. *See* Exhibit B.

1.4 The MIOP's Drought Provisions Are Flawed

The MIOP constitutes a definite improvement over the IOP to the extent that elements of the Exceptional Drought Operations (EDO) Plan have been included. The absence of any such

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drought provisions was obviously a major omission in the original IOP. Nevertheless, two of these provisions need to be changed.

1.4.1 The Use of "Composite Storage" as the Trigger for Drought Operations Ignores Special Consideration that Should be Given to Lake Lanier.

First, we continue to object to the use of a drought trigger based on Composite Storage. Composite Storage does not accurately reflect the status of system storage. Because the lower reservoirs refill so quickly, in comparison to Lake Lanier, it is possible for system storage to be in Composite Zone 2—the threshold under the MIOP for ending Drought Contingency Operations—even while Lake Lanier is still in Zone 4.

To assess this probability we modeled the probability that system storage would reach Composite Zone 2 by April 30, 2009 under the MIOP, based on starting conditions as they existed on May 1, 2008. Probabilities were calculated using the Hirsch method to prepare conditional streamflow forecasts. The results are provided in Table 1 below. The analysis shows a 62% probability that system storage will reach Composite Zone 2—and hence that drought operations will end—at a time when Lake Lanier is still in Zone 4. This shows that the Drought Contingency Operations will terminate too soon in most cases. *See* Exhibit C.

Table 1. Probability that System Storage Will Reach Composite Zone 2 by April 1, 2009, Terminating Drought Operations, While Lake Lanier is in a Given Zone

	System Storage Reaches Composite Zone 2 When …				**System Storage Does Not Reach Composite Zone 2**
	Lanier is in Zone 4	Lanier is in Zone 3	Lanier is in Zone 2	Lanier is in Zone 1	
# years in simulation	42 of 67	10 of 67	0 of 67	0 of 67	15 of 67
probability	62%	15%	0%	0%	22%

Instead of using Composite Storage, drought operations should continue until *Lake Lanier* is in Zone 1. Alternatively, it is possible to construct a rule based on forecasts of the probability that Lanier will refill within a certain period of time. Such a rule would have the potential to optimize operations using the best available information.

1.4.2 The "Drought Zone" Is Too Low

We do not believe the "Drought Zone," as currently drawn, sufficiently protects users who rely on reservoir storage. By the time system storage has fallen into the Drought Zone, the system is already at a severe risk and past the point at which emergency actions should be taken. What is more, initiating drought operations when conservation storage is nearly exhausted would be particularly problematic in a prolonged, multi-year drought. In that case, conservation storage could be almost completely expended early in the drought period and prior to the

commencement of drought operations. This would leave insufficient storage to meet needs in the basin, including water supply for metropolitan Atlanta, in the remaining drought years.

We reiterate that it is inappropriate for the drought trigger to be based on Composite Storage. But if the Corps is determined to use Composite Storage as the trigger for reducing minimum flow requirements, the flow should be reduced immediately whenever the system is in Composite Zone 4, and such measures should remain in place until Composite Storage and Lake Lanier have both recovered to Zone 1.

1.4.3 The "Drought Zone" Is Arbitrary

Furthermore, the delineation of the "Drought Zone" appears to be completely arbitrary. The Corps' letter to FWS states that the Drought Zone delineates a volume of water "roughly equivalent" to the amount of storage in the inactive storages in Walter F. George and West Point and Lake Lanier combined with the amount of storage in Lake Lanier Zone 4. In other words, the Drought Zone will generally be entered when the lower reservoirs are empty (of conservation storage) and Lake Lanier is in Zone 4. But the description further states—without explanation or justification—that the Drought Zone has been "adjusted" to include a "smaller volume of water at the beginning and end of the calendar year." What is the basis for these "adjustments" to the Drought Zone, and why would it ever be appropriate to terminate emergency operations at a time when the lower reservoirs are empty and Lake Lanier is in Zone 4?

1.5 Forecasts Should be Used To Improve Reservoir Operations

A large body of literature has been developed on the subject of hydrological forecasting. The United States Geological Service (USGS) has been using and relying on these methods for decades. The Corps should utilize these tools, with appropriate margins of error, to optimize reservoir operations.

The MIOP uses "Composite Storage" as the principal indicator of drought conditions, but this is a poor surrogate for a good forecast. Operations in the Spring of 2007 under the IOP/Concept 5 provide a case in point. Concept 5 required the Corps to meet a "desired flow" of 6,500 cfs—as opposed to the "required flow" of 5,000 cfs—until composite storage fell to Zone 3. The Corps began releasing water from storage to meet the "desired" target of 6,500 cfs on May 8, 2007, at a time when the available forecasts were already predicting an extremely dry summer. The predictable result was a rapid, pointless depletion of system storage—42,000 acre-feet of water were released between May 8 and May 31, at which time system storage fell into Composite Zone 3 and releases were finally reduced.

The 42,000 acre-feet of water that were released from May 8 to May 31 to meet the "desired flow" of 6,500 cfs equates to over a foot of elevation in Lake Lanier—enough water to meet the average annual consumptive needs of the metropolitan area (250 cfs) for 84 days. The loss of this water had a lasting impact on system storage, which still has not recovered. In exchange for this substantial cost, the temporary increase in flows to the Apalachicola River had no lasting benefit. After depleting system storage to the level of Composite Zone 3 within just 3 weeks,

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flows in the Apalachicola River fell to the "required" level of 5,000 cfs and remained at that level throughout the summer and fall—that is, until the alarming loss of system storage caused the "required" flow of 5,000 cfs to be reduced even further. Therefore, any organisms requiring flows at or above 5,000 cfs must have perished during the long period after May 31 when flows were at or below this level.

Needless to say, we are pleased to see that the Corps has taken these events to heart and has modified the IOP to eliminate the "desired flow" of 6,500 cfs. The larger point remains, however, that release requirements and flow reductions under the MIOP are still tied to Composite Storage without reference to hydrological forecasts. This is a fundamental flaw in the framework of the IOP.

1.6 Lanier Should Not Be Used To Balance the Lower Reservoirs In Cases Where the Lower Reservoirs Can Fill On Their Own, Without Support From Lake Lanier

Also, although it is generally appropriate to use Lanier to balance the lower reservoirs, this does not always make sense. Releasing water from Lanier to help refill West Point and Walter F. George as the top of their conservation pools rise between February and June is especially wasteful. In most years the only effect of releasing water from Lake Lanier to balance the lower reservoirs is to fill the lower reservoirs a few days earlier. This is wasteful in situations where system storage is low and needs to be preserved, and where it is unlikely that Lake Lanier itself will refill. In these cases intervening flow should be used to refill the lower reservoirs instead of releasing water from storage in Lake Lanier.

1.7 Release Requirements Should Consider Management Objective and Not Blindly Adhere to Basin Inflow

Another fundamental flaw in the MIOP is the fact that release requirements are blindly tied to Basin Inflow without operating for specific needs and balancing needs in the basin.

"Basin Inflow" is a legal construct with little connection to specific needs or operational objectives. Its original justification, as is clear from the record, was that reservoir operations could not be considered the legal cause of any environmental impacts caused by flows at least equal to Basin Inflow. Although this is legally correct, it does not follow that passing Basin Inflow is the best mode of operation for the reservoirs or that the Corps is legally required to operate in this manner.

The stated objective to maximize spawning habitat for the Gulf sturgeon is a perfect example. There is no evidence to show that reservoir operations have any effect on sturgeon spawning success, or that the amount of spawning habitat currently available at RM 105.5 is not sufficient to meet the needs of the species. Nonetheless, even if increasing sturgeon spawning habitat were an appropriate objective, the data show that the amount of spawning habitat available at RM 105 plateaus at 10,000 cfs to 11,000 cfs. Flows in excess of this amount actually *reduce* the amount of available habitat. Therefore, the MIOP is actually counter-productive to the extent it requires releases in excess of 11,000 cfs based on the level of Basin Inflow.

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This is just one example of many. The more general point is that the Corps should strive to develop an operating plan in which release requirements are based on balanced operational objectives as opposed to abstract concepts like Basin Inflow.

1.8 Corps Models and Data Need to be Corrected

Finally, we are concerned that the Corps continues to use flawed models to evaluate modifications such as the MIOP. Deficiencies are detailed in the attached memorandum from George McMahon, Ph.D. *See* Exhibit D.

2. The Corps Should Not Attempt To Use Reservoir Storage to Drought Proof the Apalachicola River

In addition to commenting on the specific provisions of the MIOP, we have also taken this opportunity to address certain fundamental limitations of the ACF Reservoir system that need to be considered by all stakeholders in the development of water control plans for the ACF Reservoirs.

The reality is that reservoir operations cannot significantly affect the timing or quantity of flows in the Apalachicola River for any extended period of time. This is a consequence of the distribution of storage within the basin, as is described further in Section 2.1 below. Another consequence of the distribution of storage within the basin is that attempts to utilize reservoir storage to manipulate the Apalachicola River can quickly drain Lake Lanier, which may take years to refill. This is discussed further in Section 2.2. In terms of cost-benefit analysis, such operations provide negligible benefit to the Apalachicola River while creating significant economic hardship and creating great risks to the health, safety and well-being of the millions of people who rely on reservoir storage for water supply and other purposes. These impacts are discussed in Section 2.3.

Further, as is discussed in Section 2.4, the State of Florida's focus on metro Atlanta is completely misplaced. The truth is that metro-area water use is not a significant contributor to environmental issues in the Apalachicola River and Bay. Instead of pointing fingers, the State of Florida should work with the Corps to identify and address the causes of and potential solutions to these problems.

2.1 Reservoir Operations Cannot Significantly Affect Flows in the Apalachicola River Over an Extended Period of Time

One result of the upside-down distribution of reservoir storage within the ACF Basin is that reservoir operations cannot significantly affect the pattern of flows in the Apalachicola River. This can be seen by modeling a plan in which each reservoir is permitted to maximize storage subject only to at-site release requirements. For illustration purposes only we have modeled such a rule, which we call the "At Site Objectives" Plan. In this plan each reservoir operates to meet at-site objectives, including the 750 cfs flow target for Buford Dam and the 5,000 cfs flow target for Jim Woodruff.

Figure 5 and Figure 6 show the cumulative distribution of flows at the Chattahoochee gage for the MIOP and the "At Site Objectives" Plan. Although the MIOP does provide slightly higher flows in the range between 5,000 cfs and 15,000 cfs, *see* Figure 5, the difference is remarkably small and insignificant over the entire range of flows. *See* Figure 6.

The differences between the MIOP and the At Site Objectives Plan are even less significant when one considers impacts to the hydrograph. Figure 7 through Figure 9 show three representative two-year periods, two dry and one wet. These figures demonstrate that reservoir operations have little effect on the overall timing and pattern of flows in the Apalachicola River.

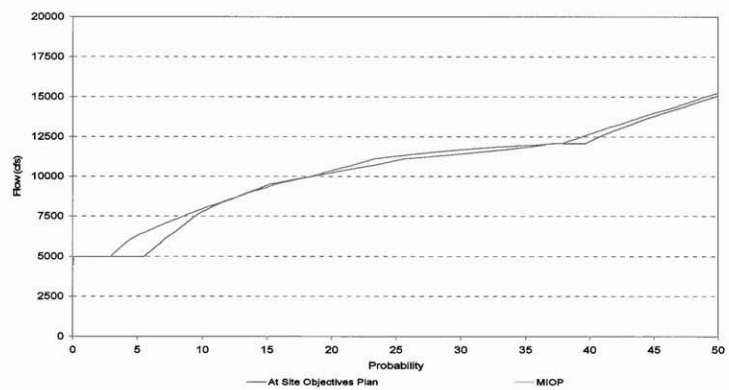

Figure 5. Flow at the Chattahoochee gage under MIOP as compared to flow under the "At Site Objectives" Operating plan.

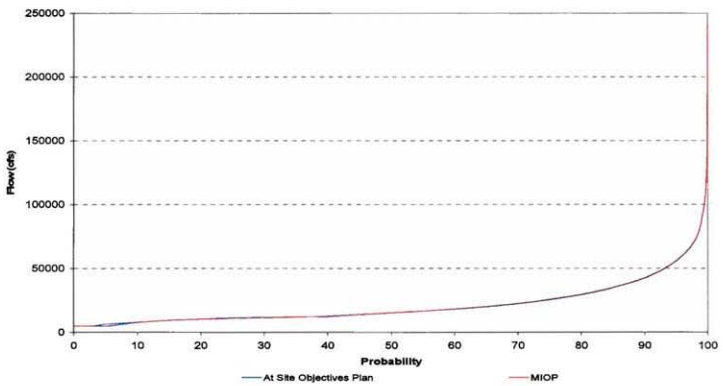

Figure 6. Flow at the Chattahoochee gage under MIOP as compared to flow under the "At Site Objectives" Operating plan.

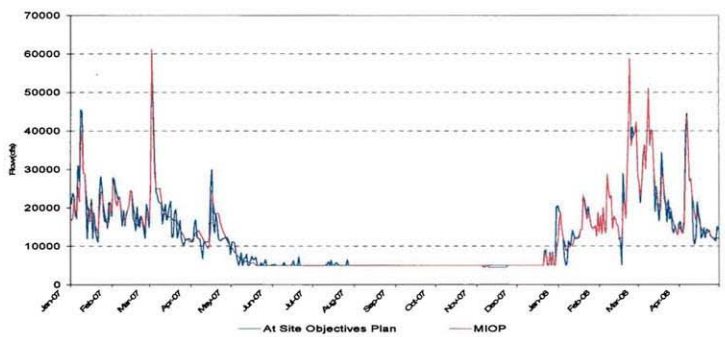

Figure 7. Simulated flow under MIOP and At-Site Objectives Operating Plan from January 2007 to April 2008

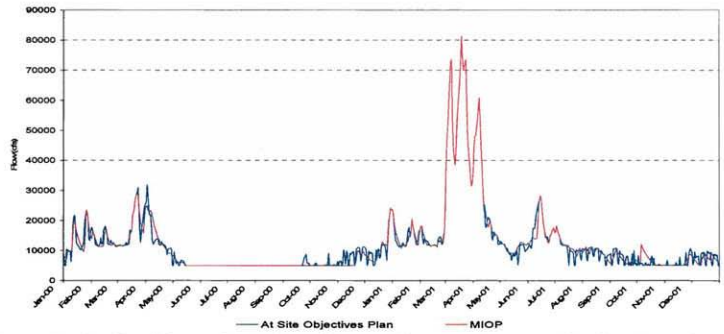

Figure 8. Simulated flow under MIOP and At-Site Objectives Operating Plan from December 1999 to December 2000

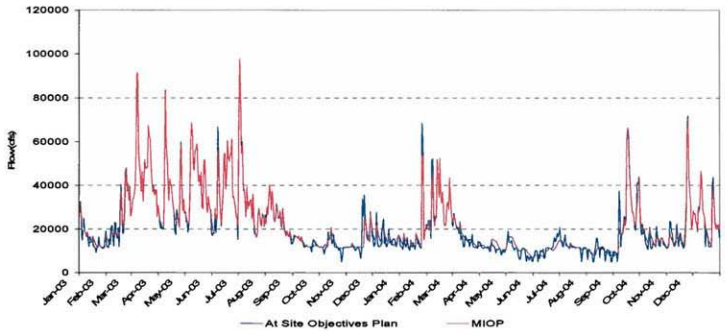

Figure 9. Simulated flow under MIOP and At-Site Objectives Operating Plan from January 2003 to December 2004

2.2 Lanier Should Not be Drawn Down Excessively Because Lanier Takes a Very Long Time to Refill

A second consequence of the geography of the ACF Basin—with Lake Lanier at headwaters, controlling just 5.6% of the drainage area of the basin—is that it takes a very long time to refill Lake Lanier once it is drawn down.

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Figure 10 shows the average annual inflow (acre-feet per year) into each of the three storage reservoirs. 0 provides similar statistics in a different form. The table shows, for example, that the drainage-to-storage ratio for West Point is 100 times greater than that for Lake Lanier. 0 further shows that it would take 279 days to fill Lake Lanier *if the entire flow of the river (based on the annual average flow) were captured and stored.* This statistic is provided for purposes of comparison only—in reality it would take much longer than 279 days to refill Lanier because it will never be possible to capture and store 100% of the inflow to this reservoir.

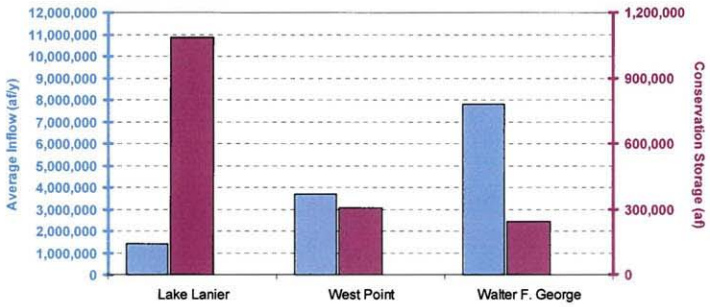

Figure 10. Average daily inflow (acre-feet per year) and conservation storage for ACF Reservoirs.

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Table 2. Drainage-to-storage and inflow-to-storage ratios for the ACF Storage Projects. The Inflow-to-storage ratio is the total conservation storage divided by average daily inflow in acre-feet.

	Lake Lanier	West Point	Walter F. George	George Andrews	Lake Seminole
Drainage-to-storage ratio	.0001	.0112	.0305	n/a	.2578
# of Days to Fill Conservation Storage Assuming Zero Releases and Inflow Equal to Average Annual Inflow	279	30	11	n/a	n/a

The events of 2007 illustrate the effect on Lanier's very small drainage-to-storage ratio. Figure 11 through Figure 13 show the actual, recorded levels for West Point, Walter F. George and Lake Lanier from June 2007 to May 2008. These Figures show that West Point and W.F. George responded almost immediately to the rains that began in November 2007. Even with reduced releases from Buford Dam, these reservoirs, which had been at the bottom of Zone 4, refilled completely by mid-January. In fact, both reservoirs are now *over* full, as defined by the "top of conservation" line in the graphs. In sharp contrast, Lanier is still fifteen feet below rule-curve—a record low for this time of year—and the level is projected to fall even further for the rest of the year.

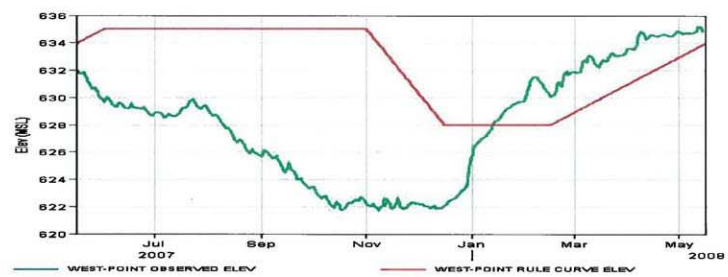

Figure 11. West Point Lake Levels from June 2007 to May 2008

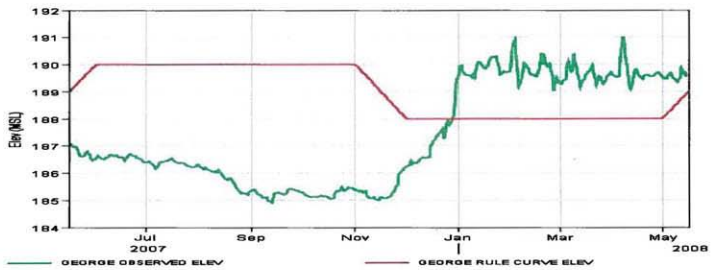

Figure 12. Walter F. George Lake Levels from June 2007 to May 2008

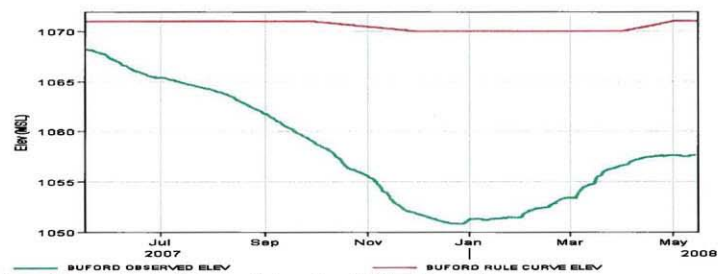

Figure 13. Lake Lanier Lake Levels from June 2007 to May 2008

2.3 The Costs to North Georgia Far Outweigh the Limited Benefits that Can be Achieved by Draining Lake Lanier to Manipulate Flows in the Apalachicola River

The very long time it takes to refill Lake Lanier, coupled with the limited benefits that can be achieved, weigh heavily against any attempt to use storage in Lake Lanier to manage flows in the Apalachicola River.

2.3.1 Low Lake Levels Have a Substantial, Lasting, Adverse Impact on North Georgia

Low lake levels at Lake Lanier have a profound, negative impact on the economy and general well-being of North Georgia. In the absence of any significant sources of groundwater, the vast majority of the metropolitan area relies on Lake Lanier and on another federal reservoir—Lake Allatoona, in the Alabama-Coosa-Tallapoosa (ACT) River Basin—to meet water needs. Lake Lanier supplies most of the region. Therefore approximately 3.5 million people rely exclusively on Lake Lanier, and on the Corps, to provide water supply for municipal and industrial purposes.

Low lake levels threaten the security of the water supply for 3.5 million people and for the businesses and industries within the ACF River Basin. This risk is very real, and the magnitude of the potential catastrophe resulting from an empty reservoir can hardly be over-stated.

In addition, costs to North Georgia have already been and will continue to be extremely high. Water restrictions have already had a catastrophic effect on the urban agricultural industry, a large part of Georgia's economy with more than 7,000 businesses employing a workforce of some 80,000 Georgians. Urban agriculture contributes more than $8 billion in annual sales to the state's economy. Numerous business have failed and thousands of jobs have been lost within this industry alone. According to research by the University of Georgia, losses to Georgia's urban agriculture industry due to the recent drought—and in large part due to water restrictions necessitated by the mismanagement of Lake Lanier—are approximately $262 million per month. This translates to an annual loss of $3.14 billion if current conditions and restrictions continue.

The $5.5 billion recreation economy supported by Lake Lanier has suffered as well. Low water levels have led to out-of-service boat ramps, unusable beaches, impassable channels and unusable private docks. These impacts are real and have economic implications for residents, business and governments of Gwinnett, Forsyth, Hall and surrounding counties, and for millions of visitors who normally come to Lake Lanier as a recreation destination.

Local governments are suffering as well. Water utilities have had to adopt extreme response measures on an emergency basis to respond to the precipitous decline in levels at Lake Lanier. In addition to disrupting the lives and businesses of their customers, these emergency measures have cost the metropolitan area Water Supply Providers over $60 million to date. This lost revenue has created substantial difficulties for local governments and authorities whose rate structures and bond financing depend upon predictable revenues.

In sum, the costs to North Georgia, both immediate and potential, far outweigh the trivial benefits that can be achieved by attempting to use Lake Lanier to manipulate flows in the Apalachicola River 350 miles downstream.

2.3.2 The Corps Should Not Rely on Dead Storage to Supply Basic Needs

Florida suggests Lake Lanier should be drawn down below the level of "inactive storage." This is unconscionable. The Corps should not gamble with the health and safety and well-being of 3.5 million people. Lanier should never be drawn down into the dead pool, or even near it.

2.3.3 Contrary to Florida's Allegations, Water Use in the Metro Area is Not the Cause of Any Problems that Might Be Occurring in the Apalachicola River

The State of Florida has complained that the Corps has not done enough to limit depletions in the upper part of the basin. Once again, however, Florida's accusations have little basis in reality, which is that depletions in the upper basin are too small to have any significant impact on the flow of the Apalachicola River.

Notwithstanding our near-total reliance on Lake Lanier for water supply, the entire metropolitan area consumptive use is just 250 cfs per day on average, which is just 1.2% of the average annual flow of the Apalachicola River at the Chattahoochee gage (at the Florida-Georgia line). Metro-area consumption rises in relation to river flow in drought years—but even then the net loss to the basin is just 2% of the annual flow. In other words, if all consumption stopped, and if the river were allowed to pass through North Georgia without any withdrawals or diversions of any kind, the flow of the river at the Florida line would increase at most 2%.

This is a function of the geography discussed above. Because Lake Lanier controls only 9% of the total flow of the basin above the Florida line, 91% is geographically inaccessible to the metro area. In reality, of course, we use only a fraction of the flow that is actually accessible to us, and we return the majority of the water withdrawn. That is why our total impact is on the order of just 1 to 2%.

To put this in perspective, metropolitan Atlanta's average consumptive use of 250 cfs corresponds to approximately 1.8 inches in river stage at the Chattahoochee gage in the Apalachicola River at the river's lowest flow. This in a river that fluctuates wildly, often as much as 2 feet per day as a result of hydropower operations. *See* Figure 14.

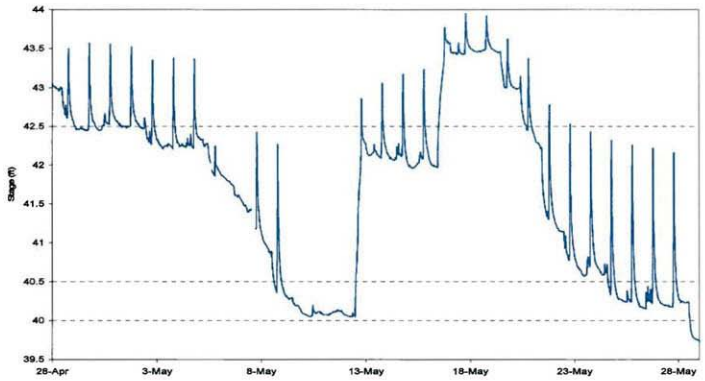

Figure 14. Apalachicola River stage at Chattahoochee gage from April 28, 2008 to May 29, 2008.

Furthermore, although it is true that our withdrawals vary seasonally, the average annual use is the appropriate point of comparison from which to assess impacts to the Apalachicola River, given the availability of reservoir storage in Lake Lanier. The use of storage helps to "smooth out" seasonal variations in withdrawals. Water that is withdrawn from storage affects stream

flow when it is taken from the stream and placed into storage—usually in the winter or spring—and not when it is it is withdrawn from the reservoir.

Moreover, Metro Atlanta is not even biggest user in the ACF Basin. Consider the following:

- Depletions to the Flint River due to agricultural irrigation in South Georgia average approximately 268 mgd (415 cfs), which is about 66% more than metro Atlanta's net water consumption. Total agricultural withdrawals for irrigation are even higher. The number cited above is the total depletion of surface waters in the Flint River due to the combination of surface and groundwater withdrawals.

- Evaporation from the mainstem reservoirs alone causes depletions of approximately 135 mgd (209 cfs).

2.4 The State of Florida and the Corps Must Acknowledge and Address the Real Causes of Environmental Issues in the Apalachicola River and Bay

Instead of pointing fingers at the metro area, the State of Florida and other stakeholders should acknowledge that many of the issues in the Apalachicola River are being caused by factors unrelated to reservoir operations or water withdrawals.

To the extent Florida is concerned about salinity in Apalachicola Bay, for example, Florida and the Corps should be studying ways to solve the problems created by Sikes Cut, which is a major contributor to salinity in the bay. Florida should also study the issues created by inter-basin transfers out of the lower Chipola River, such as the Gulf County Canal that is used to transport water to Port St. Joe.

Similarly, to the extent Florida and the Corps are concerned about the areal extent of flooding or the amount of certain types of habitat that are inundated, Florida and the Corps must acknowledge that real causes of these problems have more to do with channel degradation than with the quantity of flow in the river. USGS has documented the effect of channel degradation in the Apalachicola River, which has substantially lowered the bed of the river in key places, such as the sturgeon spawning area at River Mile 105.5. *See Figure 15.* This is highly significant because many of the environmental issues in the Apalachicola River, and especially those related the Gulf sturgeon and mussels, have more to do with the areal extent of flooding or inundation as opposed to the quantity of flow *per se*. As a result of the lowering of the channel, it now takes much more water to achieve any given river stage. At the principal spawning ground for the sturgeon, RM 105.5, USGS has determined that an additional 10,000 cfs is required to raise the river its former stage. This is *40 times* the average annual consumptive use of the entire metropolitan area (250 cfs). *See Helen R. Light, Water Level Decline in the Apalachicola River, Florida, from 1954 to 2004, and Effects on Floodplain Habitats (USGS Scientific Investigations Report 2006-5173) at 25, Figure 13.*

Mr. Flakes and Ms. Carmody
May 29, 2008
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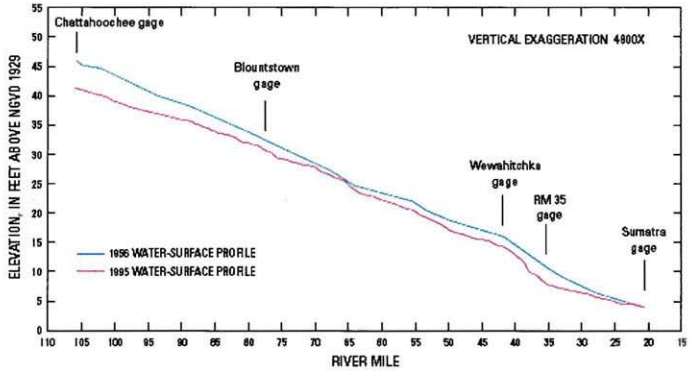

Figure 15. Channel degradation in the Apalachicola River, from Helen R. Light, Water Level Decline in the Apalachicola River, Florida, from 1954 to 2004, and Effects on Floodplain Habitats (USGS Scientific Investigations Report 2006-5173) at 9 (Figure 4).

Likewise, the Apalachicola River appears to be migrating to the Chipola Cut-off, a man-made diversion that is claiming up to 40% of the flow of the mainstem of the river, according to the most recent statistics. This diversion is partially responsible, along with other factors such as the build-up of sediment at the head of the slough—for the dewatering of Swift Slough in 2006 and 2007. Water-use in the metro area pales in comparison to the amount diverted by this artificial cut-off. *See Figure 16.*

Mr. Flakes and Ms. Carmody
May 29, 2008
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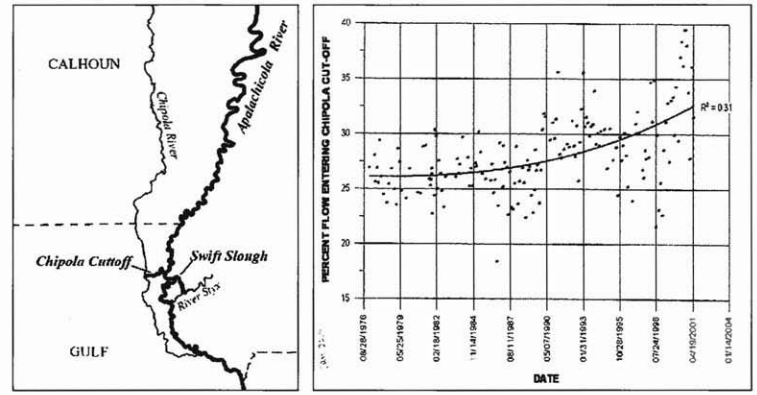

Figure 16. Percentage of the Main Channel of the Apalachicola River Entering Chipola Cutoff from 1976 to 2004. From Administrative Record in State of Georgia v. U.S. Army Corps of Engineers (M.D. Fla. 07-cv-1) GAI001733.

All parties should also acknowledge the role played by agricultural users in South Georgia. According to statistics prepared by the State of Georgia, the average annual streamflow depletion caused by agricultural irrigation is 415 cfs, compared to 250 cfs for the entire metropolitan area. *See* Exhibit E. Unlike the metro-area withdrawals, which are taken from storage, agricultural withdrawals from the Flint River Basin have an immediate effect on stream flows. Operating plans that require the Corps to meet a fixed, minimum flow at the Chattahoochee gage effectively require the Corps to use reservoir storage to compensate for such depletions. Without questioning whether the Corps is legally authorized to utilize reservoir storage to facilitate irrigation, it seems clear that the Corps cannot be *required* to do so under the Endangered Species Act.

These are all real problems that cannot be corrected by curtailing water withdrawals or by simply manipulating reservoir operations. These issues need to be acknowledged and addressed by the stakeholders and by the Corps.

3. Conclusion

In conclusion, we urge you to consider further modifications to the MIOP to eliminate its more apparent flaws. More generally, however, the IOP/MIOP is a misguided and futile effort to use reservoir storage to solve environmental issues in the Apalachicola River. The potential benefits of this effort to the Apalachicola River are negligible and are far outweighed by costs to users who rely on storage. Therefore the IOP/MIOP should be set aside at the first opportunity. It should not be the starting point for new ACF Water Control Plan.

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May 29, 2008
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Thank you once again for your efforts. Please do not hesitate to call if you have any questions about these comments or if we can assist in any way.

Sincerely,

Pat Stevens

Pat Stevens, Chief
Environmental Planning

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October 23, 2008

US Army Corps of Engineers-Mobile District
107 Saint Francis Street, Suite 1403
Mobile, AL 36602-9986

Subject: Management of Apalachicola-Chattahoochee-Flint River System

Special Emphasis: Lake Sidney Lanier

Based upon the information provided at today's presentation in Marietta, GA regarding updating the ACF Water Control Manual, the following additional comments are made:

- The watershed drainage area for Lake Lanier comprises only six percent (6%) of the watershed area within the ACF basin; however it contains sixty four percent (64%) of the water storage capacity for the ACF basin. Therefore it is very evident that the Corps of Engineers has allowed a serious mismatch to occur while planning the location and construction of its several dams within the ACF basin. Too much is being expected from Lake Lanier to serve distant needs hundreds of miles to the south while not being able to adequately meet the needs of nearby Metropolitan Atlanta.

- 5+million people rely upon Lake Lanier and the Chattahoochee River north of Atlanta as the primary source of drinking water for Metropolitan Atlanta. Also, many Metro Atlantans rely upon Lake Lanier to meet their recreational needs as evidenced by Lake Lanier being very heavily used for this purpose.

- The Corps of Engineers is continuing to release more water from Lake Lanier than is being received into Lake Lanier. Thus the water level of Lake Lanier continues to drop to levels that have created a serious danger to the health, safety, and welfare of the citizens of Metro Atlanta.

- Demand for additional drinking water for Metropolitan Atlanta will continue to increase in the future, however there is only a relatively small drainage basin from which to draw its water needs from. Additional sources of water located north of Atlanta are desperately needed.

- Obtaining additional drinking water for Metropolitan Atlanta from the Tennessee River or from other sources must be found within the not too distant future. The Corps of Engineers should direct its efforts to accommodate this end result.

Please refer to the letter which is attached for a more detailed discourse regarding my views on this matter.

PS: We attempted to e-mail this notice to you at www.acf-wcm.com, but received a not valid address response.

Sincerely yours,

William E. Carroll

WILLIAM E. CARROLL
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WOODSTOCK, GEORGIA 30188

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Cell: (404) 444-8686
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E-Mail: billcarroll22@comcast.net

Date: October 23, 2008

To: U.S. Army Corps of Engineers

Subject: Management of Apalachicola-Chattahoochee-Flint River System

Special Emphasis: Lake Sidney Lanier

Lake Sidney Lanier lies just north of Metropolitan Atlanta and serves as the primary drinking water source of this City of 5-million people. The normal full pool level of this lake is 1071 feet above sea level. However poor management, politics, endangered species scare tactics, and a prolonged drought have caused the water level of this most valuable and essential drinking water and recreational resource to be drawn down to the current extremely low water level of 1053 feet above sea level. Corps of Engineers releases from Lake Lanier are continuing to lower the level of Lake Lanier by a foot every two weeks which will lower Lake Lanier even below this extremely low level of 1053.

The watershed area for Lake Sidney Lanier is relatively small, and this area has been in a prolonged drought. This small watershed area combined with the fact that Lake Sidney Lanier is the primary source of drinking water for Metropolitan Atlanta **makes it imperative that a minimum level of 1060 above sea level must be retained within this lake for the health, safety, and welfare of its citizens.**

Other lakes downstream of Lake Lanier should bear the burden of trying to maintain the flow of water to Florida and Alabama to meet their needs, while relieving Lake Lanier of this burden. The demands upon Lake Lanier for drinking water, flood control, recreational needs, and other similar needs from Metropolitan Atlanta already exceed the capacity of Lake Lanier. Surely the health, safety, and welfare of the people of Atlanta outweigh any effects that lower releases from Lake Lanier may have upon some clams and sturgeons.

Releases from Lake Lanier must be reduced immediately and the lake allowed to refill back to its normal elevation. Serious studies must be undertaken to evaluate the benefits of raising the normal full pool level of Lake Lanier to 1073, building other dams for water storage north of Atlanta, and implementing conservation measures. All of these measures must be undertaken. Thank you for your consideration.

Sincerely,

William E. Carroll

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Mobile District

ACF Water Control Manual Update

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- ○ Local Gov't Agency
- ○ State Gov't Agency
- ○ Federal Gov't Agency
- ○ Other _____

Please Check a Comment Area:
- ○ ACF Basin
- ○ Blackshear Dam and Lake
- ○ Flint River Dam and Lake

Water Control Manual Update
- ○ Lake Sidney Lanier/Buford Dam
- ○ Morgan Falls Dam
- ○ West Point Lake and Dam
- ○ Goat Rock Dam
- ○ Oliver Dam
- ○ North Highlands Dam
- ○ Bartlett's Ferry Dam & Harding Lake
- ○ Walter F. George Lake & Dam
- ○ George W. Andrews Lake & Dam
- ○ Lake Seminole/Jim Woodruff Dam

Environmental Resources
- ○ Biological Resources
- ○ Air Quality
- ○ Cultural Resources

Water Management for Multiple Federal Project Purposes
- ○ Action Zones
- ○ Drought Operations Management
- ○ Hydropower
- ○ Navigation
- ○ Recreation
- ○ Flood Damage Reduction
- ○ Water Quality
- ○ Water Supply

NEPA Process
- ○ Alternatives
- ○ Baseline
- ○ Impacts Analysis
- ○ Public Involvement

- ○ ***Shoreline Management***
- ○ ***Revised Interim Operations Plan***
- ○ ***Socioeconomics***
- ○ ***Recommended Modeling Tools and Data Source***
- ○ ***Other*** _____

Comments

I believe that the Government has done a terrible job of managing the ACF Basin and Lake Lanier in particular. It seems that the reason for draining Lake Lanier is to dilute the sewerage that Atlanta puts into the river below the lake.
Question - why is Lake Lanier 18 feet down and the lower lakes almost full?
Why aren't the corps fixing boat ramps now that the water levels are low?

www.acf-wcm.com
Scoping comments will be collected by Tetra Tech for the U.S. Army Corps of Engineers, Mobile District through ***November 21, 2008.***

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ACF Water Control Manual Update

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Primarily Participating as a...

- ● *Local Resident*
- ○ *Elected Official*
- ○ *Industry/Commercial*
- ○ *Native American Tribe*
- ○ *Nongovernmental Organization*
- ○ *Academic Institution*
- ● *Local Gov't Agency*
- ○ *State Gov't Agency*
- ○ *Federal Gov't Agency*
- ○ *Other* _____

Please Check a Comment Area:

- ● *ACF Basin*
- ○ *Blackshear Dam and Lake*
- ○ *Flint River Dam and Lake*

Water Control Manual Update

- ○ *Lake Sidney Lanier/Buford Dam*
- ○ *Morgan Falls Dam*
- ○ *West Point Lake and Dam*
- ○ *Goat Rock Dam*
- ○ *Oliver Dam*
- ○ *North Highlands Dam*
- ○ *Bartlett's Ferry Dam & Harding Lake*
- ○ *Walter F. George Lake & Dam*
- ○ *George W. Andrews Lake & Dam*
- ○ *Lake Seminole/Jim Woodruff Dam*

Environmental Resources

- ○ *Biological Resources*
- ○ *Air Quality*
- ○ *Cultural Resources*

Water Management for Multiple Federal Project Purposes

- ○ *Action Zones*
- ● *Drought Operations Management*
- ○ *Hydropower*
- ○ *Navigation*
- ○ *Recreation*
- ○ *Flood Damage Reduction*
- ○ *Water Quality*
- ● *Water Supply*

NEPA Process

- ○ *Alternatives*
- ○ *Baseline*
- ○ *Impacts Analysis*
- ○ *Public Involvement*

- ○ ***Shoreline Management***
- ● ***Revised Interim Operations Plan***
- ○ ***Socioeconomics***
- ○ ***Recommended Modeling Tools and Data Source***
- ○ ***Other*** _____

Comments

Please see attached

www.acf-wcm.com

Scoping comments will be collected by Tetra Tech for the U.S. Army Corps of Engineers, Mobile District through ***November 21, 2008.***

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My particular concern is that the reservoir operations plan be updated as promptly as possible. For reasons that we all understand, this process has been delayed far too long. Because of the growth of the Atlanta region, fundamental changes must be made to reflect Atlanta's need for a dependable water supply over the next 25 to 50 years.

In addition to updating the interim operations plan, it seems to me that we need to consider all possible alternatives to the interim plan, balancing the needs of upstream users and downstream users. A key issue should be reflecting the value of the creation of jobs in the Atlanta region as against much lower value for electric power production, navigation, and agriculture downstream. None of these uses reflects the value added or the economic output of the Atlanta region as against the much lower value of output for these alternative uses downstream. Atlanta's current net usage is one to two percent of the flow at the Florida line and look eminently reasonable given the importance of the Atlanta economy to the region. Conservation and waste water treatment in the Atlanta region are the best in the state and substantially better than anything going on in Alabama or Florida.

Facts, data and scientific analysis are badly needed and should be welcomed by all parties to the litigation and in the economies of each of the states.

ROBERT G. KOPP
6661 Woodlake Drive
Flowery Branch, GA 30542

Inputs for the Water Control Manual for the ACF

(1) Build flexibility into the manual so that the COE can be more pro-active & less reactive. (Quit going by an old manual – change it!)

(2) Have pre-set intervals for manual review & updates. (don't let the manual get so outdated that chaos occurs forcing change.)

(3) Consider the economic impact. (While business suffers & property value falls, I know of no such in Alabama & Florida that are directly related to the lack of water).

(4) Store more water in Lanier:
(a) minimize releases for downstream unless Lanier is full. (once you let it go you have lost control).
(b) Raise the Lanier level to 1073. (The Pro's far outweigh any Con's).

(5) Consider history. (Historically there have got to have been droughts equal to or worse than the current one. The mussels, other marine life & wild life survived & they can/will again. Before the dam & the COE, God & nature ran things & they are still here!).

O/A Comment: Management of the ACF by the COE has played directly into hands of Alabama & Florida in recent years. They have gotten adequate/more than adequate water so why agree to a change? They have & will drag out the Water Wars as long as possible!

RGK

STATEMENT

WATER CONTROL MANUAL FOR THE APALACHICOLA-CHATTAHOOCHEE-FLINT (ACF) RIVER BASIN IN ALABAMA, FLORDIA AND GEORGIA

LaGrange, Georgia

October 22, 2008

Billy G. Turner, President

Robert L. Tant, Executive Vice President

Columbus Water Works

Columbus Water Works (CWW) appreciates the opportunity to provide input for the update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) Riverbasin in Alabama, Florida and Georgia.

The Chattahoochee River has always played a major role in the life of Columbus. That role is expanding even more today. A river restoration project which involves breeching two small dams promises to restore the river to a more natural state and accommodate the establishment of a whitewater rafting enterprise and increased tourism and recreational activities. The Corps has engaged in considerable study of this project and it continues to make progress.

Currently, there are plans to develop a major marina complex to complement the National Infantry Museum. Oxbow Meadows Environmental Learning Center and the continuing development of this once blighted area. Also, Columbus and Phenix City, Alabama support the redevelopment of this area a major inland port. A report by Troy University addressing 1) navigation; 2) recreation; 3) water supply; 4) assimilation: 5) real estate; and 6) power calculates the economic impact on the Apalachicola-Chattahoochee-Fling (ACF) system and concludes that navigation is potentially significant economic benefit to this area.

Because of the above plans, CWW continues to be concerned that the Corps' focus seems to be isolated to only two points of flow in the ACF, at Peachtree Creek and the headwaters of the Apalachicola. We have repeatedly asked that the Corps broaden their focus and give significant attention to the flows in the middle Chattahoochee River, especially during periods of drought and flooding.

We believe that the cloud on the future growth of the Columbus area can be laid at the feet of the Corps due to its failure to operate the system consistent with the authorized project purposes. It is the Corps responsibility to operate the system as charged and to maintain the authorized navigational channel from Columbus to the Gulf of Mexico. The Corps must recognize its responsibility to enable

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development throughout these areas of Georgia and Alabama rather than serving as an impediment to vital economic growth.

It is vitally important that the Corps recognize and understand that the Chattahoochee River provides water supply and wastewater assimilation for both domestic and industrial entities. Intertwined with these uses is our determination to see this regions aquatic ecology protected. We believe all of these concerns can be accommodated if the Corps understands the relationships among these discrete functions and operates the ACF system accordingly.

It is of critical importance to CWW that the Corps pay greater attention to Chattahoochee River flows in the middle stretch of the river. Our FERC approved flows of 800cfs minimum, 1350cfs daily average and 1850cfs weekly average are critical and necessary to sustain the aforementioned projects and programs at Columbus and southward.

These flows, for reasons unknown to us, are not being consistently met. Since June 24, 2008, our FERC flows have fallen short some 60% of the time for weekly averages and 10% for daily averages. These shortfalls came in spite of the Corps IOP modeling which states that the FERC flows will be met as long as West Point reservoir exceeds an elevation of 621.6 feet. This elevation has been met and significantly exceeded all summer.

These occurrences certainly raise questions for CWW. Are these lapses due to a lack of attention by the Corps to this stretch of the river? Is there some other overriding consideration of which we are not aware? The Corps' ambivalent attitude concerning the FERC flows at disconcerting, especially since Crops documents state that all FERC flows will be maintained. Yet Corps representatives continue to state in public that there is no obligation to meet FERC flows. The Corps cannot continue to take these incompatible positions.

We need some assurance from the Corps that the FERC flows at the Columbus gage will be observed and protected as called for in the IOP.

We appreciate the Corps attention to these issues.

The lake is very important to LaGrange. It is a great recreation facility, which brings more job oportunities.

Real estate is so affected by the level of water. Of course, the needs for water for consumption and personal use

are obvious. We need our lake for growth of our town, recreation, business opportunities, drinking water and other

uses at home. Please consider our needs as you make your decisions. Thank you.

US Army Corps of Engineers®
Mobile District

ACF Water Control Manual Update

RELEVANT
READY
RESPONSIVE
RELIABLE

Proudly serving the Armed Forces and the Nation now and in the future.

Name: Eucle Vickery Address: 151 Leisure Cove Dr-LaGrange, GA

City: LaGrange State: GA Zip: 30240 Email: VICEUCIS1@wirelesshomeland.com

Primarily Participating as a...

- ✓ *Local Resident*
- o *Elected Official*
- o *Industry/Commercial*
- o *Native American Tribe*
- ✓ *Nongovernmental Organization*
- o *Academic Institution*
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Please Check a Comment Area:

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Water Control Manual Update

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- o *Alternatives*
- o *Baseline*
- o *Impacts Analysis*
- ✓ *Public Involvement*

- o ***Shoreline Management***
- ✓ ***Revised Interim Operations Plan***
- o ***Socioeconomics***
- o ***Recommended Modeling Tools and Data Source***
- o ***Other*** _____

Comments

See attached

www.acf-wcm.com

Scoping comments will be collected by Tetra Tech for the U.S. Army Corps of Engineers, Mobile District through ***November 21, 2008.***

Official Comments
U.S. Army Scoping Meeting
Callaway Center of
West Georgia Technical College
LaGrange, GA
October 22, 2008

TO: U.S. Army Corps of Engineers

From: G. Eucle Vickery
151 Leisure Cove Dr.
LaGrange, GA 30240
Lake Front Property Owner and Troup County Taxpayer
Email: viceuc151@wirelesshometown.com

SUBJECT: Case for West Point Lake

1. Maintain minimum lake level of 633 to 635 feet above mean sea level. Historically, lake levels have run from a low of 622 to a high of 637. In the winter, it is virtually impossible to keep our boat at our dock. The summer climate, especially from an economic impact point, suffers as well. It is also frustrating to constantly monitor the Corps website for lake levels in order to keep our boat floating. Lower lake levels also expose tree stumps and obstructions that were left in the lake when the lake first filled. This causes monetary damages to boats, docks and most importantly, human life.
The Corps must find a new approach to managing water levels to ensure year-round minimum levels of 633 to 635 msl. The extreme variance in the action zones for West Point Lake can have an adverse impact on the lake during a dry winter; the real impact of the action zones is seen in dry summers. These wide ranging action zones allow the corps to satisfy other parts of the basin by pulling water from West Point Lake throughout the summer, severely impacting the use of the lake for recreational purposes.

2. Return to managing the lake consistent with Congressionally authorized purposes.
In the Corps' November 1973 Master Plan, the purpose of West Point Lake was defined as having been "developed for the purpose of providing a wider variety of recreational facilities and opportunities for the public than normally provided at Corps lakes." In fact, West Point Lake was the first lake in the United States authorized by Congress with a specifically designated authorized purpose of "general recreation."
Historically, the lake has been maintained at very low levels between late summer and late spring of the following year to provide for flood storage. The reserved volume for storage has rarely, if ever, been needed during the life of the lake. As a matter of fact, during the 1993 spring flood event, the lake was already at full pool when we received a record 11 inches of rain in less than 12 hours. The rain fell below the Whitesburg flow gauge and even without proper data, the Corps managed to keep the dam and the lake safe as well as areas downstream. Reducing the volume of storage reserved for flood control and using other methods to mitigate flooding, while

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maintaining a minimum lake elevation of 633 msl, would allow for flood control while ensuring West Point Lake is managed in a manner consistent with Congressional authorized purposes.
3. Restore and maintain recreational facilities. We not only live on the lake but we also enjoy camping at the local Corps parks. However, the campgrounds are desperately in need of updating. There are a number of campers with expensive RV's and other 21st century camping options that can't camp at these campgrounds due to outdated facilities. The restrooms, electrical outlets, water sources, washer and dryer facilities are either outdated or desperately in need of repair. The Corps has consistently faced reduced funding for recreational facilities at the West Point Lake Project. Federal recreational facilities surrounding the project often are closed due to lack of funding. Facilities are justified for closing due to lack of use and lack of funding. I beg to differ that it is the inconsistent water levels and lack of updated facilities that are keeping campers out of these parks. State Line Park is a prime example and it is probably one of the most beautiful parks on the lake.
The Corps must recognize that use has fallen off because of historic and consistent low lake levels at the project maintained by the Corps. The facilities must be reopened and restored for use by the public and lake levels must be maintained above 633 msl so that the lake remains desirable for use and attractive to the public as a viable recreational facility. With our close proximity to both Columbus and Atlanta and with the implementation of an additional 35,000 troops at Ft. Benning by 2009, now is the time to complete these changes.

4. Project water quality. West Point Lake was established for sport fishing and wildlife development. The quality of its water also must meet recreational use standards. As the source of water for a large population base in West Georgia, it is essential that water quality in the reservoir be maintained to higher standards than currently are set by the Georgia Environmental Protection Division. The lake at all times must comply with the Federal Clean Water Act. Operations must be adjusted by the Corps to assure adequate inflow of water and lake elevations to dilute nutrient loading into the lake contributed from upstream metropolitan area influences.

5. Maximize positive impact. West Point Lake was promised to the community by Congress as a recreational resource. That promised and the associated economic opportunities have not been fulfilled. Our recent economic study revealed that the lake has fulfilled less than 20 percent of its economic potential, and has denied use and economic opportunity to the regions surrounding the lake in Alabama and Georgia due to its consistently low levels. West Point Lake must be maintained at an elevation of 633 msl or higher to assure that economic damage does not result from Corps operations that allow for low lake levels, and to assure economic potential is fulfilled as promised to the citizens of East Alabama and West Georgia.

6. Ensure recreational access for low income and minority families. Many lower-income and minority families in West Georgia and East Alabama rely on and utilize the shoreline and surface water of West Point Lake to fulfill their recreational needs and provide food for sustenance. When the lake elevation is lowered below 633 msl, the ability to use West Point Lake ot fulfill this essential social function is compromised.
The Corps must address the recreational needs of lower income and minority individuals by maintaining and sustaining an elevation of 633 msl or higher year round to provide a usable, safe lake with accessible surface waters and shoreline recreational facilities.

7. Wildlife Protection. We moved back to this area in 2000 and that year there were approximately 4 bald eagles on West Point Lake. In 2007, that number had increased to over 100. The majority of these predators migrate here in the spring from Canada. The American Bald Eagle is still on the endangered species list. We've already had one eagle hurt on a tree stump in the lake during low lake levels. That bird had to be treated at the vet hospital at Auburn University before being released back in the wild. One of the rangers had to rescue an Osprey nest that was dangerously close to the waterline due to the sudden rise of the lake. It is imperative that you take into account the incredible numbers of wildlife on this lake and protect them for future generations. Last summer, due to low lake levels, we lost thousands of mussels that help to keep the lake clean.
It is imperative that you continue to protect all the wildlife on the lake.

On miscellaneous issues, sedimentation continues to be a major problem. In our cove alone, we have developed a sand bar as a result of the variance in lake levels over the years that is a water hazard for unsuspecting boaters. Also, on the north end of the lake, the flows have drastically reduced in the main river channel and I've been told by some boaters that some areas are almost impossible to get through. It is also apparent that the lake is not as deep as it was when first impounded. Years of abuse and inconsistent water levels drastically contributed to the current situation.

Thank you for your cooperation so far in this long running debate and all of us in this community appreciate you taking the time to gather the facts. The future of West Point Lake is in your hands. Please don't let us down.

Eucle Vickery

Eucle Vickery

October 22, 2008

To: Corp of Engineers

From: Dolly Martin
33 Indian Bend Trail
Lagrange, GA 30240

Re: Management of West Point Lake

Thank you for accepting input into new operational procedures for West Point Lake. As an owner of property adjacent to the Lake, I would like to make the following points regarding management of West Point Lake:

- The lake should be managed as originally mandated by Congress. It was intended primarily as a recreational lake and should be managed to allow recreational use a full 12 months of the year. Since it was developed as a recreational lake, the local economy is geared towards that use. Therefore, there is a significant negative economic impact when the lake is unsafe for recreation.

- The winter pool should be maintained at or about 633 MSL. This would allow 12-month recreational use of the lake and store water for the dry summer months.

- Recognize that dry weather conditions will remain in the Southeast. Our environment is changing and our water systems cannot be managed as they were 20 years ago.

- Manage Lake Lanier and the rest of the basin in such a way that West Point Lake is not sacrificed for their wants or needs.

- Include emergency drought measures in the operational manual to avoid the mis-management that occurred in 2007 and early 2008. For example: Include explicit procedures to temporarily remove endangered species from the criteria to manage flows until the drought emergency is over.

Thank you for accepting and considering this input.

Dolly Martin

Dolly Martin

October 22, 2008

To: Corp of Engineers

From: Dave Martin
33 Indian Bend Trail
Lagrange, GA 30240

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Thank you for accepting and considering this input.

Dave Martin

October 22, 2008

To: Corp of Engineers

From: Brenda J. Harris
155 Indian Bend Trail
Lagrange, GA 30240

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Thank you for accepting and considering this input.

Brenda J. Harris

October 22, 2008

To: Corp of Engineers

From: Billy L. Harris
155 Indian Bend Trail
Lagrange, GA 30240

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Thank you for accepting and considering this input.

Billy L. Harris

I would like to see the lake maintain full pool or with in a two to three feet of full pull year round. It would help the economy in our area as fisherman and others would utilize it year round safely.

The raising and lowering of the lake seems to cause more erosion. Which seems will cause more problems down the road.

I also feel it would behoove us to generate electricity from the lake when we are letting water out. It seems wasteful not to.

Maintaining the parks and their infrastructure is also critical to the recreation/tourism in the area.

Relaxing some of the codes on the lake would be beneficial. Who ever surveyed it did a lousy job. Some of the homes are so far uphill from the lake it's almost funny. Then others are so close to the lake on level ground.

Allowing a dock with two slips and a sun deck would be nice. You have to get very creative to pass this with the local ranger.

10/22/08

Corps of Engineers
West Point Lake

To whom it may concern,

Lake levels and water quality are a major concern to me. I purchased a house in a subdivision on the lake as a retirement home where I could boat from my own dock. I have always wanted to live on a lake because I have always enjoyed boating , both sailing and power boating. After looking at lakes in Alabama and Georgia, we picked West Point Lake. I had always heard of how great this lake was for recreation. We invested in a house and an improved dock, and then realized that water levels in the lake sometimes were questionable from year to year.

I understand the drawdown in the winter for flood control, and I understand about drought conditions, but what I could not understand was the inequality in the attempt to favor down stream areas. I can go along with what comes in must go out, but taking away what water we have in order to maintain someone else's water level doesn't make good common sense. What did the muscles and sturgeons do when there was a drought before there were any controls on the river system. I can understand the muscle and oyster farmers on the ACF river saying salt water intrudes up stream when the water level drops from up river. This would be a fact of nature even if there were no dams to control the flow.

In today's economy, I hate to see my property value decrease because of low water levels and I dislike having to pull my pontoon boat (which was bought new in LaGrange) out of the water and not be able to enjoy this lake as it was intended. My sail boat has not been in the water for 2 years. This year I was afraid the water levels would drop prematurely and I would have to pull it out early.

Hopefully, I can depend on the Corps of Engineers to maintain a good level next summer and I can find the peacefulness of a good sail on this beautiful lake, and have another full season with 635 foot water level.

Thank you for allowing me to express my frustrations.

Hugh M Toles
313 Cheyenne Drive
LaGrange, GA.
30240
706-884-8858

MOLLY M. LINK
215 RIVER OAKS DRIVE
LAGRANGE, GA 30240
706 883-7440
mlink@asdsinc.com

October 22, 2008

I understand that the U.S. Army Corps of Engineers has invited input from the public for consideration while updating the Water Control Manual for the Apalachicola-Chattahoochee-Flint River Basin. The following is submitted with much appreciation for the opportunity to express my concerns and interests related to the management of West Point Lake.

After living 15 years in Alpharetta, GA, a hectic face-paced stressful suburb of Atlanta, my husband and I decided to relocate to a less stressful environment. Our criteria for relocating were that the new place be on a lake and within an hour drive to the Atlanta airport for the travel required of his work. After viewing three lakes, we decided on West Point Lake. The city of LaGrange had many desirable attributes and we loved the fact that the lake was not over populated and developed, and the natural lakeside beauty was maintained. In June 2000 we purchased a lot for building and within three years we had begun construction of our home. During those three years we would occasionally visit West Point Lake between April and November with friends and rent a boat from Highland Marina for a lovely day riding on the lake and swimming.

After moving into our home in late 2004, we continued this practice until we purchased a ski boat in August 2005. Unfortunately, from August 2005 there was a span of 33 months that West Point Lake's monthly average lake level was below the full pool of 635mll, with only 9 months during this time that the water level was at 632mml for safe boating. This created some issues when we purchased our dock in January 2006 because the water level was too low to get the gang way to the shore for final installation. Looking toward the spring and higher water levels, we purchased a power boat lift and waited, and waited, and waited for the lake level to get to 632mll for installation. A small window of time provided the water level needed to complete boat lift installation. In addition, during this time we started our annual Memorial Day party. At our inaugural party we took our guest for boat rides and hoped to start a yearly gathering for friends. The next year our Memorial Day party was had but we could only sit on the dock because the lake level was too low to launch the boat off of the lift.

Both years, 2006 and 2007, proved to be a very frustrating and shocking times in West Point Lake boating community. (See attached photo.) We were unable to safely use our ski boat except for four months during these two years. There has

October 22, 2008

been excessive finger pointing among the Corps of Engineers leadership with the lack of reasonable justification for the extreme drop in lake levels and the inconsistencies in the management of the lake levels. My request is that the lake be managed as a recreation lake as authorized by Congress, which would include maintaining a stable lake level through out the year at 633 to 635 feet. This would also include maintaining the lake recreational facilities and launches.

Unexpectedly, the 2008 year has been an exciting year for us on the lake because it is truly the first year we have been able to enjoy it fully since moving here four years ago. With our boat we enjoy riding on the lake observing its natural beauty, skiing and tubing with our two daughters and their friends. During this past year we invited several families from our church out boating to teach their children to ski and tube. We have also discovered some beautiful locations to anchor and enjoy a picnic lunch. Several time this year we would boat over to our friend's place on the lake, pick them up and a pizza for dinner, eat and float abound for a relaxing and fun evening during the summer. We are just discovering the many opportunities that the lake offers for recreation. Maybe next year we will take up fishing!

Thank you for this opportunity to share our concerns for these critical lake issues. While updating the West Point Lake operating manual please consider managing and maintaining the lake level at 633 to 635mll to ensure that the lake is restored and preserved as a recreational lake, consistent with Congress original authorized purpose.

0581

Army Corp of Engineers

My name is Danny Rock, I have lived in LaGrange since 1989 and I'm glad to be here. I have enjoyed fishing, boating, walking the shoreline and on occasion camping at West Point Lake since I've been here. I live near McGee Access, Horace King and Pine Road Park. I use the boat ramps and have been taking my 9 year old granddaughter fish and walking the shoreline exploring and pick up shells since they were 2 years old and two younger granddaughter will been coming along soon.

I have worked picking up trash with West Point Lake Coalition's lake clean up days and pick up litter on my own when at the lake and teach my granddaughter to do the same.

I appreciate the corp and what you do to maintain the lake and campgrounds. And the opportunity to make a statement of my concern for the lake.

I also appreciate the West Point Lake Coalition and agree with there effort to take care of this beautiful lake.

I hope to see continued effort to:

- clean up the shoreline
- continue to improve the water quality
- continue to improve the fishery and habitat
- maintain the lake level as close to the full pool as possible
- continue to maintain the campground

Thanks again,

Danny Rock

Danny Rock
936 Vernon Ferry Rd.
LaGrange, GA 30240

Elizabeth B. Johnson

108 Windridge

LaGrange, GA 30240

October 22, 2008

Subject: West Point Lake concerns

The major concerns that I have regarding West Point Lake are:

1. Keeping the lake at an optimum level of 633 – 635 feet year round.
2. Water quality of the lake.

The lake has been beautiful and fun to use this past summer. For the first time in several years we have been able to keep our boat at the dock which has added to our enjoyment of the lake.

I have also been pleased to read about the testing being done regarding the quality of the Lake water. The Chattahoochee River has been the source of drinking water for LaGrange as long as I can remember. The ability to furnish high quality drinking water in sufficient quantity to meet the needs of the population is mandatory for any town especially one that is growing and is economically viable.

As a Realtor I have seen the lake level have direct impact on the value of property and on the economy in LaGrange. It also impacts the health, quality of life and the beauty of LaGrange and the counties which border the lake. During times of low lake levels, I have heard derogatory remarks from real estate customers and visitors to our town. It definitely has shapes the opinion of people regarding the desirability of the area.

High lake levels tend to correct the majority of the problems that most people have concerning the lake whether they are economic, conservation, recreational, health, or esthetic issues.

Charles B. Johnson

108 Windridge

LaGrange, GA 30240

October 22, 2008

Subject: West Point Lake concerns

The major concerns that I have regarding West Point Lake are:

1. Keep the lake level at 633 – 635 feet year round.

October 22, 2008

Submission of comments regarding the Operating Plan for Lake West Point, GA

I own a sailboat that is docked at the Southern Harbor Marina near the dam that formed Lake West Point. I was sailing today and saw a bald eagle swoop down from the sky and attempt to pluck a fish from the lake. Last year I would not have been able to see this glorious sight because there was not enough water at the Marina to allow safe navigation.
I pay for my slip assuming that there will be enough water maintained in the Lake to permit safe operation. The previous plan allowed too much water to be passed south without regard to the impact. As I understand it, the Lake was authorized by Congress in part to be a recreational facility. Failing to maintain the Lake with the minimum pool level of 635 to 633 feet above MSL does not abide by the Congressional intent and therefore should not be accepted in the new plan.
Thanks for the opportunity to express my thoughts.

Calvin Willis
819 Piney Woods Dr
LaGrange, GA 30240

U.S. ARMY CORPS OF ENGINEERS

Scoping Meeting

LaGrange, Georgia
October 22, 2008

My name is Tim Duffey and I live within 3 miles of West Point Lake off Glass Bridge Road. I have enclosed a copy of the letter to my legislative representatives for your information on my back ground and why I am interested in this venture.

My comments are not intended to lay any blame but to respectfully support any action that will improve our water situation regarding our lake. My comments are quite simple:

1. I fully agree that the operational purposes that were implemented on day one for the use of the dam and resulting lake should be adhered to as closely as possible.

2. I fully understand that new and more serious needs have arisen over the years, such as Atlanta's water supply for drinking and sewage plus Florida's fish industry- all due to supply and demand as a result of growth.

This plus the same needs for recreational purposes have been affected by growth and demands. We (local and state officials and the Corps. of Engineers) have discussed these and other matters over the course of several years. The resulting solutions were to take all these matters to a common table and all parties agree to a " Share the Pain" plan.
I think it is great that the Corps is rethinking their plan and "asking" the actual daily "users" for input. I think it is high time that we all shed our past and concentrate on a brighter future for all concerned. Each and every entity's need is equally as important, but all should realize that we will have to share the pain to survive.

Thanks for your attention,

Tim Duffey
122 Lincoln Lane
Lagrange, GA 30240-8708
706-884-5157
tduffey@charter.net

U.S. Rep. Lynn Westmoreland
1118 Longworth Building
Washington, D.C. 20510

October 17, 2007

Honorable Lynn Westmoreland,

I am forwarding my concern to our legislative body about the future of West Point Lake in Troup County. My family moved here in 1965 upon my discharge from the U.S. Air Force. I began employment with the telephone company in West Point and subsequently spliced the communications cable at the construction site of the West Point Dam facilities.

Later in 1973, I was employed by Troup County Commission to establish a countywide fire and rescue department now utilizing 13 fire stations, 17 fire engines and three state certified rescue vehicles and several other items. I have responded to 58 drownings over the past 30 years in West Point Lake not to mention several grass fires, vehicle & boat accidents and other minor incidents.

From 2003 until 2007, I served as Chairman of the Troup County Commissioners and during that time served on the West Point Lake Coalition, led the commissioners on a revitalized 10 year plan to upgrade and construct an arena, paved parking and several boat docks to facilitate various fishing tournaments, family activities and concerts among others. I have personally worked with the city of LaGrange Council and the development authority in trying to reach an amicable agreement to maintain a reasonable level of water for the lake year round.

I hope by now I have proved a vested interest in West Point Lake. Now, in June of 2003 the City of West Point was flooded due to the miscalculated efforts of the Army Corps of Engineers. I am not bashing the Corps of Engineers, mistakes happen and this one was mostly due to a faulty gauge as I understand it. However, it was costly to West Point.

I have seen all the models presented to the commissioners and other professional reports over the years and have signed most of the checks for the costly efforts. The State of Georgia has done the same. But, an environmental issue from the Fish and Wildlife seems to have stopped as we are all protecting the mussels and sturgeons in the Florida inlet. Where are the Fish and Wildlife as we are loosing catfish, crappie and bass in the dead pools of water in West Point Lake? And these fish are used for human consumption as well. Also, our area is suffering economic losses because reaching the water for tournaments and other fishing activities and on and on.

Gentlemen, we all understand the affects of a drought, and we are not arguing the fact that from time to time, that will happen. But, when the dam is discharging water to Florida six hours daily at a very high rate (last evening the Chattahoochee River gauge building was almost to the level of the banks just North of West Point) passes the point of common sense. I am pleading with all of you to take the lead and do away with the current IOP in favor of a plan the will make common sense.

Thank you all for your leadership.

Sincerely,

Tim Duffey
122 Lincoln Lane
LaGrange, GA 30240

cc: Sen Saxby Chambliss
Sen Johnny Isakson

STATEMENT

WATER CONTROL MANUAL FOR THE APALACHICOLA-CHATTAHOOCHEE-FLINT (ACF) RIVER BASIN IN ALABAMA, FLORDIA AND GEORGIA

LaGrange, Georgia

October 22, 2008

Billy G. Turner, President

Robert L. Tant, Executive Vice President

Columbus Water Works

0587

Columbus Water Works (CWW) appreciates the opportunity to provide input for the update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) Riverbasin in Alabama, Florida and Georgia.

The Chattahoochee River has always played a major role in the life of Columbus. That role is expanding even more today. A river restoration project which involves breeching two small dams promises to restore the river to a more natural state and accommodate the establishment of a whitewater rafting enterprise and increased tourism and recreational activities. The Corps has engaged in considerable study of this project and it continues to make progress.

Currently, there are plans to develop a major marina complex to complement the National Infantry Museum. Oxbow Meadows Environmental Learning Center and the continuing development of this once blighted area. Also, Columbus and Phenix City, Alabama support the redevelopment of this area a major inland port. A report by Troy University addressing 1) navigation; 2) recreation; 3) water supply; 4) assimilation: 5) real estate; and 6) power calculates the economic impact on the Apalachicola-Chattahoochee-Fling (ACF) system and concludes that navigation is potentially significant economic benefit to this area.

Because of the above plans, CWW continues to be concerned that the Corps' focus seems to be isolated to only two points of flow in the ACF, at Peachtree Creek and the headwaters of the Apalachicola. We have repeatedly asked that the Corps broaden their focus and give significant attention to the flows in the middle Chattahoochee River, especially during periods of drought and flooding.

We believe that the cloud on the future growth of the Columbus area can be laid at the feet of the Corps due to its failure to operate the system consistent with the authorized project purposes. It is the Corps responsibility to operate the system as charged and to maintain the authorized navigational channel from Columbus to the Gulf of Mexico. The Corps must recognize its responsibility to enable

development throughout these areas of Georgia and Alabama rather than serving as an impediment to vital economic growth.

It is vitally important that the Corps recognize and understand that the Chattahoochee River provides water supply and wastewater assimilation for both domestic and industrial entities. Intertwined with these uses is our determination to see this regions aquatic ecology protected. We believe all of these concerns can be accommodated if the Corps understands the relationships among these discrete functions and operates the ACF system accordingly.

It is of critical importance to CWW that the Corps pay greater attention to Chattahoochee River flows in the middle stretch of the river. Our FERC approved flows of 800cfs minimum, 1350cfs daily average and 1850cfs weekly average are critical and necessary to sustain the aforementioned projects and programs at Columbus and southward.

These flows, for reasons unknown to us, are not being consistently met. Since June 24, 2008, our FERC flows have fallen short some 60% of the time for weekly averages and 10% for daily averages. These shortfalls came in spite of the Corps IOP modeling which states that the FERC flows will be met as long as West Point reservoir exceeds an elevation of 621.6 feet. This elevation has been met and significantly exceeded all summer.

These occurrences certainly raise questions for CWW. Are these lapses due to a lack of attention by the Corps to this stretch of the river? Is there some other overriding consideration of which we are not aware? The Corps' ambivalent attitude concerning the FERC flows at disconcerting, especially since Crops documents state that all FERC flows will be maintained. Yet Corps representatives continue to state in public that there is no obligation to meet FERC flows. The Corps cannot continue to take these incompatible positions.

0587

We need some assurance from the Corps that the FERC flows at the Columbus gage will be observed and protected as called for in the IOP.

We appreciate the Corps attention to these issues.

Jay B. Fager
131 Cameron Pointe Drive
LaGrange, GA 30240

October 22, 2008

U.S. Army Corp of Engineers
Washington, DC

Re: West Point Lake

Gentlemen,

I'd like to take this opportunity to voice my concerns regarding the management of West Point Lake, which is located in west central Georgia. The lake level should never drop below 930 msl. At this level, the lake could be utilized safely all year long. Since the authorized purpose of the lake is recreational, an increase in the minimum pool level would guarantee increased activity 12 months a year.

When the current economic downturn subsides, LaGrange, GA and Troup County in general, are poised for tremendous growth! The lake is very important to the economic well-being of this area. It is an asset that we want to preserve and improve. Water issues downstream in Florida impact our lake and economy in many negative ways. As the multi-year drought continues, the Corp cannot continue to manage water resources using outdated information governing the Chattahoochee River basin. Common sense solutions can be achieved if accurate river data is available. If the amount of water released from West Point Lake and other upstream reservoirs, exceeds what is coming into the basin from the surrounding water shed, it is obvious that the water levels up and down the length of the basin will be impacted in a negative way.

The battle for water rights and its' usage has been unresolved for way too long. It is time for the Corp to exhibit leadership, and seek a solution to the problem as quickly as possible.

Sincerely,

Jay B. Fager

Lee and Ann Cathey
95 Hickory Lane
LaGrange, GA 30240
706-884-2737

October 22, 2008

Army Corps of Engineers
West Point Lake

To Whom it May Concern,

My reason for writing this letter is to give feedback to those who manage the West Point Lake about the success of the Interim Operating Plan for lake management. This is my family's second year on the lake. The first year was quite unusual due to the drought and water release. Frankly, I hope to never see the lake in the shape it was in for 2007 again. It never got to full pool. Our dock was only floating for about two weeks and then it was on the ground again. We really began to question whether or not moving to the lake was a good decision.

We believe that the Temporary Interim Operating Plan has been wonderful this year because we have been able to use our fishing boat to fish, visit restaurants across the lake, take pictures of some amazing wildlife and even show the beautiful lake scenery to our (out of town) friends and others who live in the area. It has remained an incredible source of enjoyment and recreation for our family. We would like to let you know that we strongly support the continuation of the water lake levels as they've been through the Interim Operating Plan. Please do not look to West Point Lake so much as a "working lake" for the downstream water reservoirs or the saving of the obscure species of urchins who have survived for thousands of years up to the present.

We are thankful for the good, common sense approach that we see taking place now. However, we would like to see additional methods of testing water quality taking place. While the lake is apparently healthy, we believe the information would be helpful.

Sincerely,

Lee Cathey

Ann Cathey

Erin Cathey
95 Hickory Lane
LaGrange, GA 30240
706-884-2737

October 22, 2008

Army Corps of Engineers
West Point Lake

To Whom it May Concern,

I understand this meeting is to get feedback to those who manage the West Point Lake about the Interim Operating Plan for the lake. I will say that I really enjoy fishing and always have enjoyed it. But when we first moved to the lake, I was really discouraged because the water was so low that we couldn't even use our dock for most of the year.

I think that this year has been much better and the Temporary Operating Plan has been a good thing. My friends and I have been able to fish, use our jet skis and swim more this year than ever before. I've probably been out there every weekend (I didn't have to work) this summer. I love that there is water enough for the dock to float and we've been catching some bass here lately that are a nice size. I do think the lake should be used for recreation purposes and shouldn't be allowed to get as low as it was last year and in the years before that. Of course, I know it was a drought, but that didn't explain why all our water collected had to be released downstream.

I have to admit that when I was a teenager, my friends would have birthday parties at the lake and we would have to get out of the water because of things we saw floating in the water. It is better now or I wouldn't even go in the water. I hope that being downstream from Atlanta hasn't continued to make our water unclean. I hope they are treating their sewage better now than they used to. Testing the water might help us to understand that.

I am glad that you adopted the Temporary Operating Plan of maintaining higher lake water levels and hope you will continue this use this water level plan in the future.

Sincerely,

Erin Cathey

Erin Cathey

Alex Cathey
95 Hickory Lane
LaGrange, GA 30240
706-884-2737

October 22, 2008

Army Corps of Engineers
West Point Lake

To Whom it May Concern,

I wanted to come to the lake meeting, but I couldn't come on this day. I wanted you guys to know how I feel about the Interim Operating Plan for the lake though. I like to fish and swim with my friends in the water, but wanted to say that we were not able to do that last year because our dock didn't even reach the water. I like the way that you have kept the water up during this Operating Plan and hope that you will continue to keep the lake levels as high as you can during the summer months.

This lake was created for lots of different purposes and I've got to say that recreation is important to our LaGrange and West Point, not to mention the Alabama side of the lake. Not too long ago, I started to notice all the different fishing boats being pulled through town and when I could, I tried to pay attention to the tags on them. Some of these fishermen come from a long way away to fish in West Point Lake. That means they've got to stay somewhere close by and they've got to eat in our restaurants. I think its good for our economy when you keep the lake water high. Please keep it up so we can draw more fishermen and tourists to our area. But not only them, there are a lot of poor people who camp out on the banks and fish all weekend. They might really need the fish to eat. It is kind of hard to say what people do when they are hungry and spent all their money on gas just to get to work and back.

Please do your best to keep the water levels high.

Sincerely,

Alex Cathey

October 22, 2008

When we moved into our house in July of 2007 from the Florida Gulf Coast, we were excited to be living on a peaceful West Point Lake. Imagine our distress when our lake-front property slowly became a puddle surrounded by Georgia clay. Our grandchildren were able to walk under our dock, instead of dangling their feet off the edge of it into the refreshing water.

We wondered if we had made a mistake moving to the lovely town of LaGrange and further would not have done so just 2-3 months later. What about our property value? What about the drawing card of the lake bringing in new residents?

We realize that there are many issues that affect our beautiful West Point Lake; we just hope that when it comes to adjusting the lake level, at least as much consideration be given to local use as is given to political influence. We certainly do not want to be left out... stuck in the mud.

Thank you for this meeting and the opportunity to express our individual and collective requests to maintain West Point Lake at a level that supports the original intent.

Chuck and Pam Rogers
1 North Willowcrest Way
LaGrange, GA 30240

Possible Effects of Regional Landfill on West Point Lake

Residents have grave concerns regarding the quality of the water in West Point Lake. Pollutants from upstream make it vital to maintain water levels high enough to keep the water healthy. Better laws are needed to protect our environment from construction run-off, industrial waste dumping, sewage sludge from cities, etc. An imminent source of possible toxic pollution is the development of regional landfills in our state. Georgia does not prohibit the dumping of solid waste from outside the state. This means that our state is becoming the dumping ground for imported waste. Two years ago the Georgia Department of Community Affairs reported that imported waste had grown to more than 1.6 million tons. This amount has been rapidly increasing since that time, as private waste companies have found it profitable to locate mega-dumps in rural areas.

Composite landfills are constructed with a tough plastic liner over compacted clay. Evidence shows that brand new liners can be expected to leak even if they are installed with the very best and most expensive quality control procedures. Leakage is caused by pinholes during manufacture and by holes created when seams are welded together. In addition the liners allow some chemicals to pass quite readily. Some solvents can penetrate the liner in less than two weeks. Another problem is stress cracking. Some liners have failed from stress cracking in only 2 years of use. Some authorities have said that a number of household chemicals and even such benign things as margarine, vinegar, ethyl alcohol (booze), shampoo, wave lotions, hand cream, vegetable oil, or shoe polish can degrade the liner and cause it to leak. Authorities are in general agreement that all landfills leak.

Leachate (garbage juice) is water that gets badly contaminated by contacting wastes. The Chattahoochee-Flint Regional Development Center said, , "*According to the SWAP [Blue Creek Source Water Assessment Plan, part of the Federal Safe Drinking Water Act], landfills are commonly associated with some of the following potential pollutants: alkalinity, acid/base, chloride, fluoride, metals, nitrogen, pathogens, pesticides/herbicides, petroleum products, phenol, potassium, radioactivity, sediment, solvents, sulfates, and surfactants.*" Dr. Kirk Brown and Dr. K.C. Donnelly at Texas A & M examined data that showed 113 different toxic chemicals in leachate from municipal landfills. Brown and Donnelly conclude, "The risk calculations based on suspect carcinogens. . .. indicate that the estimated carcinogenic potency for the leachate from some municipal landfills may be similar to the carcinogenic potency of the leachate from the Love Canal landfill." Once in land or water, toxins cannot be removed.

The health risks of living near landfills are serious and myriad. Studies show possible increased risk of bladder and brain cancer, and leukemia. They also show that residents living near landfills may be exposed to chemicals that can reduce immune system function, leading to an increased risk of infections. Babies born to mothers living near landfills have a greater risk of birth defects, according to researchers at the London School of Hygiene and Tropical Medicine. "Children living near waste sites, whether land or contaminated bodies of water, are hospitalized more frequently with acute respiratory infections," said Dr. David Carpenter, director of the Institute of Health and the Environment, at the State University of New York at Albany. Carpenter said the extent to which toxic landfill contaminants suppress the immune system has been "underestimated.

On December 21, 2007, the Georgia EPD issued a permit to an out-of-state company to construct a 35,152,695 cubic yard regional landfill to be constructed on watershed of Blue Creek which is a tributary of West Point Lake. Following a thorough study and many strong objections from Meriwether County citizens, *the Chattahoochee -Flint Development Center found that the "Proposed project is not in the best interest of the region and therefore the State.*" Nevertheless, the project went forward and work has begun. Resolutions opposing the landfill have been endorsed by the Ga.Sierra Club, The Upper Chattahoochee Riverkeepers, the state NAACP, Eco-Action, and many local groups and individuals. Senators Seth Harp and Mitch Seabaugh and Congressman Lynn Westmoreland have all spoken against the landfill.

A dump on a tributary of the lake threatens its $250 million annual contribution to the local economy.

(1)

Hogansville Dump

Name: Turkey Run Landfill (likely to be known as Hogansville Dump).

Location: On the gateway to Troup County, 1000feet from Hogansville City Limits, just off Exit 28 of I85, visible from the Interstate, 500 feet from Hwy 54, on the watershed of Blue Creek.

Size: 300 feet high on 300 acres (one-half the area covered by Stone Mountain).

Amount of Waste: 2500 to 3000 tons per day (may include 30 to 36 tons of used disposable diapers per day.)

Tipping Fees: Fees will be determined by Landfill owners. In 2002 the average price in the U.S. was $33.70 per ton. Discounted fees offered to Meriwether County do not apply to Hogansville or Troup County.

Origin of waste: Anywhere. Georgia does not prohibit out-of-state waste.

Control of Waste Type: Agreement requires only that 2 loads per day (out of an estimated total of 150 daily loads) have the covers drawn back for visual inspection and/or photographing by company employees.

Monitoring: Mostly self-monitored (fox guarding hen house?)

Facility Inspection: Only two times per year by EPD representative.

Kinds of Waste: Industrial, demolition, and construction waste; garbage and trash from businesses, hospitals, restaurants; household waste (paper, yard waste, kitchen garbage, packaging materials, household cleaners and chemicals, paint, batteries, outdated and unused medicines, light bulbs, etc.); anything people want to get rid of.

Construction: Plastic liner (thickness of two credit cards) over compacted clay. Even with precautions, liner will leak. (Bottom of liner will be close to five feet of the seasonal high elevation of the water table aquifer.)

Hours of Operation: 16 hours a day (3:00 am to 7 pm) Mon. through Fri.; plus 8 hours (7am to 3 pm) on Sat.

Duration: Active operation for 30 years, may be extended to 40 years. Compacted waste will remain virtually forever.

Impacts:

- Contamination of water--community wells, Hogansville Reservoir, West Point Lake--(what goes into Blue Creek travels by way of Yellow Jacket Creek to West Point Lake.)
- Pollution of air--methane and toxic gases, no mandated control of these for the first 5 years of operation.
- Noise--from big trucks running as well as unloading; heavy equipment for moving trash and soil--16 hours a day on weekdays.
- Offensive odors--decaying garbage, diapers, etc.
- Traffic congestion--big trucks delivering 2500 to 3000 tons per day, possibly clogged traffic especially on Exit 28 and on Hwy 54.
- Wear and tear on streets and roads.
- Depression of property values--who wants to live or work near a dump?
- Depression of business operations such as restaurants or shops.
- Curtailment of most outdoor activities.
- Discouragement or repelling of tourism.
- Diverting of potential industrial, business, commercial and housing prospects.

(2)

Dump the Dump!

Though the EPD did issue a permit to the landfill company; the fight is not over. Construction of the landfill has not begun; however, action needs to be taken now if we are to avoid having this mountain of garbage dumped on our town. We do not want to see, hear, smell, or worse, taste, 35,152,695 cubic yards (capacity of which the EPD has issued the permit) of trash. We do not have to sit idly by and let this happen to us. Each citizen has a right and a responsibility to speak out against being run over. Do your part now.

Governor Sonny Perdue is the head of this state. He has the power to stop this. Call, write, or email him today. Just tell him you want this (Meriwether County) landfill (dump) stopped now and forever.

Write to: **Governor Sonny Perdue**, Office of the Governor, Georgia State Capital, Atlanta, GA 30334. Telephone: Toll free, 1-800-436-7442, or Atlanta, 676-436-7442. To email, type in Georgia Governor Contact Information and you will be given a space for your message.

Other government officials:

United States House of Representatives, Mr. Lynn Westmoreland, 1601 East Highway 34, Suite B, Newnan, GA 30265, Phone (770-683-2033)

United States Senate, Senator Saxby Chambliss, 100 Galleria Parkway Suite 1340, Atlanta, GA 30330, Phone 770-763-9090

United States Senate, Senator Johnny Isakson, United States Senate, 120 Russell Senate Office Building, Washington, DC 20510, (202) 224-3643; or One Overton Park, Suite 970, 3625 Cumberland Blvd, Atlanta, GA 30339, (770) 661-0999.

Georgia House of Representatives, Mr. Carl Von Epps, P.O. Box 1368, LaGrange, GA 30241, 706-884-6768

Georgia Senate; Mr. Mitch Seabaugh, 421-D State Capitol, Atlanta, GA 30334, (404) 656-6446; P.O. Box 504, Sharpsburg, GA 30277, (770) 252-5598; mail@mitchseabaugh.com

Georgia Senate: Mr. Seth Harp, Capitol Office: Room 512 Coverdell, Legislative Office Bldg.,Atlana GA 30334; District Office: P.O. Box 1368, LaGrange, GA 30241; (706)884-6788; seth.harp@senate.ga.gov

Georgia House of Representatives: Mr. Randy Nix, Suite 501 Coverdell, Atlanta, GA 30334;404-656-0177; 2219 East Yorktown Cr., LaGrange,GA30240; 706-845-9853, Home; 706-302-2463, Cell; Randy.nix@house.ga.gov

Talk to your neighbors, speak up in your community, call your local radio and TV stations.

Legal action has been filed in the fight against the landfill. To help, make tax deductible donations to:

ECO-Action
P.O. Box 744
Luthersville, Georgia 30251

0595

Vern Herr <vherr@acf-wcm.com>

Lake Lanier

1 message

Susan Banasik <susanbanasik@bellsouth.net> **Sat, Nov 8, 2008 at 5:16 AM**
To: comments@acf-wcm.com

I am a home owner on Lake Lanier and am saddened by what it has become. Please implement the following:

- During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Thanks
Susan Banasik

0596

Comment ID: 0596
Author Name: Dale Smart
Organization:

-During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;
-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River;
-Management triggers must be in place for Lake Lanier withdrawals during times of drought;
-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Comment ID: 0597
Author Name: Kent Caldwell
Organization:

0597

3 years ago I purchased my retirement home on Lake Sidney Lanier because I felt it was the best water controlled lake in the state, was I wrong. I'm a full time Florida resident so I have interests in both Florida and Georgia but for the life of me I can not figure the Corps thought process in the continued release of water from lake lanier even in severe drought conditions. 2 summers ago the corp made a mistake and release approx. 2 ft of water to much and blamed it on a faulty valve, then why not shut off any future releases until you have recovered from that accidental release. At this point the lake has no recreational value because you can't access the lake and even if you could the navigation is so dangerous due to tree stumps that are not marked, that your afraid to operate a vessel for fear of damage to the vessel and the safety of your passengers. Please, please use some common sense here and think twice before you just release water downstream because downstream is having a drought as well and "they need water too!" WELL if we are having a drought and they are too then we need to conserve what precious water we have in Lake Lanier and NOT RELEASE any. When it was raining in southern GA and not in northern GA did they replace any water back into the Lake? Of course not. If you don't get a grip on the lake releases NOW you will continue to have a MAJOR problem. Thank you,
Kent Caldwell

Comment ID: 0598
Author Name: Brian Otte
Organization:

0598

When Lake Lanier hits a certain lower level - say around 1061 (or 10 feet low) - then no more water should be released than is coming into the lake.

Those snales and other wildlife in Florida were there a long time before Lake Lanier was created.

I don't see a higher lake level of 1073 as being a good alternative. The challenge to keeping Lanier full is its small basin - trying to make the lake bigger (or higher) could only make maintaining a steady lake level even more difficult.

Thank you for considering my comments.

Comment ID: 0599
Author Name: Don Turner
Organization:

0599

PLEASE PLEASE PLEASE let this Lake get healthy again. How you can continue to let water out after big rains when everything downstream is full pool goes beyond the bounds of common sense.

I respectfully request:

During the rainy season, the Corps should allow Lake Lanier to reach full pool no later than June 1;

-Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River. I ask you if Buford Dam and other downstream dams did not exist and a drought occurred - what would the mussels do?

-Management triggers must be in place for Lake Lanier withdrawals during times of drought;

-Raise Lake Lanier's full pool from 1071 ft above sea level to 1073 ft, thereby adding an additional 26 billion gallons of water to the lake.

Please, you are dealing with millions of people's water here, a significant recreational asset, and a large Lake Lanier based economy.

Respectfully submitted.

Don Turner

Comment ID: 0600
Author Name: Bill Perkins
Organization:

0600

The situation has become a disaster for the businesses surrounding Lake Lanier. It is time to save Lake lanier. if the power plants downstream need to invest in longer intake points, so be it.