HYDROPOWER 2
HYDROPOWER 2
Hydropower is a High Priority Project Purpose (Hydropower) 2
Hydropower Less Important Than Other Project Purposes (Hydropower) 4
Compensation for Lost Hydropower (Hydropower) 4
Limit sale of Power Outside the Region (Hydropower) 5
General Concern (Hydropower) 5
Critical Yield Analysis (Hydropower) 6
Hydropower Impacts (General - Manual) 6
Power Generation (Socioeconomics) 7
Power and Electricity (Infrastructure and Utilities) 7
General (Infrastructure and Utilities) 8

HYDROPOWER

HYDROPOWER

Hydropower is a High Priority Project Purpose (Hydropower)

Comment ID: 36
Author Name: Tony Owens
Organization: MeadWestvaco

Water Supply Is Not an Authorized Purpose of Lake Lanier. As noted above, the primary purposes of Lake Lanier are hydropower, flood control, and support of downstream navigation. According to the Corps' report as reprinted in House Document 300, the provision of hydropower and downstream navigation on a cost-effective basis... . . . cannot be secured by the plants below Columbus proposed herein unless a considerable storage be provided upstream to increase the minimum regulated flow and the firm capacities at those plants; without such upstream storage, the development would not be economically justified. The best development for that purpose is that at Buford proposed herein. H.R. Doc. No. 80-300 at 39 (1946) (emphasis added). In other words, the Buford project was necessary to support navigation and hydropower production below the fall line, and was constructed for the purpose of maintaining minimum flows sufficient to support hydropower and downstream navigation. Congress approved House Document 300 and authorized the Buford project on that basis. Pub. L. No. 79-525,60 Stat. 634, 635 (1946)). Congress anticipated that Lake Lanier and the other reservoirs would likely serve other purposes as well, including water supply. House Document 300 states that releases from Buford should be sufficient "so as to insure at all times a flow of Atlanta not less than 650 second-feet." H.R. Doc. No. 80-300 at 34 (1946). That flow level was deemed necessary "to meet the estimated present needs of the city, and to prevent damage to fish, riparian owners, and other interests by complete shutdowns" during off-peak hydropower production times. Id. (emphasis added). However, by addressing only the "present" needs of the city, House Document 300 clearly signaled to Atlanta more than 50 years ago that Lake Lanier would not indefinitely provide ever-increasing supplies of water for local consumption. To the contrary, use of Lake Lanier for water supply was authorized only to the extent consistent with the primary project purposes. Again, according to House Document 300, Lake Lanier "would ensure an adequate municipal and industrial water supply for the Atlanta area, would produce large benefits in the way of recreation, fish and wildlife conservation, and similar matters," but only "[incidentally" to the service of the reservoir's primary purposes. Id. at 39 (emphasis added). Section 301 of the federal Water Supply Act of 1958 also requires the Corps to provide water for local consumption only to the extent possible without compromising the primary authorized purposes. Pub. L. No. 85-500, Title III, § 301, 72 Stat. 297, 319-20 (1958), codified as amended at 43 U.S.C. § 390b. According to that statute: Modifications of a reservoir project . . . to include storage . . . which would seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed, or which would involve major structural or operational changes shall be made only upon the approval of Congress as now provided by law. 43 U.S.C. § 390b (d) (emphasis added). The Corps has long interpreted Section 301 to limit allocation of storage for water supply to the lesser of 15% of a project's total storage or 50,000 acre-feet. ER 1105-2-100, ~ 3.8.b (5). That is an accurate reflection of longstanding federal policy to view water supply as primarily a local, not federal, responsibility.

Comment ID: 46
Author Name: Herb Nadler
Organization: Department of Energy: Southeastern Power Administration

To Whom It May Concern: Southeastern Power Administration (Southeastern) is pleased to have the opportunity to provide comments to the U.S. Army Corps of Engineers, Mobile District, on the planned update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) River Basin. Southeastern is the Federal Power Marketing Administration that has the responsibility to market the electric power generated at Buford, West Point, Walter F. George, and Jim Woodruff projects in the ACF basin. Generation from Buford, West Point, and Walter F. George are marketed as part of the Georgia-Alabama-South Carolina (GA-AL-SC) System, and Woodruff is marketed as a single-project system. The overall operation of the river basin is an integral part of power marketing in terms of the effect on power production and availability of genemtion to meet customers' schedules. Any operational changes to the river basin could

dramatically affect peaking power production at the projects, and result in a loss of revenue for the Government and/or an increase in the federal power rates that the preference customers must pay in future rate adjustments. It is Southeastern's responsibility to ensure that the costs allocated to the hydropower purpose are repaid to the United States Treasury. Project repayment costs were developed and assigned based on authorized purposes receiving certain benefits from the projects. Such costs are to be repaid by the purpose in the utilization of project features, such as available storage. Typically, the costs allocated to hydropower account for a very high percentage of the reservoir project costs. In the Mobile District's update of the Water Control Manual for the ACF basin, Southeastern would be concerned with any changes which adversely impact the operation of a project with respect to the production of hydropower.

Comment ID: 48
Author Name: Tanya Blalock
Organization: Georgia Power

Accordingly, updating the WCM and its various Water Control Plans should include assessment of the water use needs necessary to maintain generation at these Georgia Power facilities as part of the baseline conditions, in accordance with Council on Environmental Quality regulations at 40 C. F. R. Part 1500.

Finally, Georgia Power must plan for future generation of electricity to meet growing demand throughout the state and region. In updating the ACF WCM, we respectfully request that the COE contemplate these future needs.

Comment ID: 85
Author Name: Charles Chapman
Organization:

As a representative appointed by the County Manager of Gadsden County, hydropower is a significant concern. Our residents in the municipality of Chattahoochee are reliant upon hydropower for their basic utilities. In addition, in an era of energy diversification, the inadequate levels of flow coming to Jim Woodruff Dam provide adverse conditions for generating alternative energy sources. Overall, an increase in flows would help to provide clean and affordable energy to our residents.

Comment ID: 106
Author Name: ELMON L. GARNER
Organization:

As City Manager of Chattahoochee, Florida, I desire that the congressionally authorized purposes be enforced and that adequate water is supplied to operate the turbines at all times.

Comment ID: 160
Author Name:
Organization:

The generation of power is a critical aspect of West Point Dam and needs to be given full support politically and economically in future planning.

Comment ID: 579
Author Name: Anonymous
Organization:

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

Comment ID: 759
Author Name: Billy R. Mayes
Organization: Dothan Utilities

10. Hydropower needs to continue to be one of the authorized activities.

Hydropower Less Important Than Other Project Purposes (Hydropower)

Comment ID: 53
Author Name: Ron Seder
Organization:

Power generation plants consume water in addition to using flow through water, and have river level requirements that influence ACF management.
Power generation at Buford Dam is much less important than using the water for water supplies. There should be a Lanier water storage transfer from power generation to water supplies.

Comment ID: 202
Author Name: Johnny R Ashmore
Organization:

I do not believe just based on my limited knowledge and the information I have discover and read that West point lake was originally intended to be a source of

hydro power.

Comment ID: 542
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.

Comment ID: 778
Author Name: Philip Burton
Organization:

Hydropower while cheap and clean power; cannot continue to be sold at the expense of drinking water and quality of life many have come to enjoy and should only be sold as a bi-product without multi-year contracts and penalty clauses in favor of hydropower purchasers.

Compensation for Lost Hydropower (Hydropower)

Comment ID: 46
Author Name: Herb Nadler
Organization: Department of Energy: Southeastern Power Administration

To Whom It May Concern: Southeastern Power Administration (Southeastern) is pleased to have the opportunity to provide comments to the U.S. Army Corps of Engineers, Mobile District, on the planned update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) River Basin. Southeastern is the Federal Power Marketing Administration that has the responsibility to market the electric power generated at Buford, West Point, Walter F. George, and Jim Woodruff projects in the ACF basin. Generation from Buford, West Point, and Walter F. George are marketed as part of the Georgia-Alabama-South Carolina (GA-AL-SC) System, and Woodruff is marketed as a single-project system. The overall operation of the river basin is an integral part of power marketing in terms of the effect on power production and availability of genemtion to meet customers' schedules. Any operational changes to the river basin could dramatically affect peaking power production at the projects, and result in a loss of revenue for the Government and/or an increase in the federal power rates that the preference customers must pay in future rate adjustments. It is Southeastern's responsibility to ensure that the costs allocated to the hydropower purpose are repaid to the United States Treasury. Project repayment costs were developed and assigned based on authorized purposes receiving certain benefits from the projects. Such costs are to be repaid by the purpose in the utilization of project features, such as available storage. Typically, the costs allocated to hydropower account for a very high percentage of the reservoir project costs. In the Mobile District's update of the Water Control Manual for the ACF basin, Southeastern would be concerned with any changes which adversely impact the operation of a project with respect to the production of hydropower.

Any changes in the plan which creates operational restrictions, or redistributes project benefits, should be accompanied by a reallocation of project costs and compensation to the impacted purpose. It is neither fair nor equitable to expect an authorized purpose to be responsible for costs which do not correspond to the level of benefits received. Any reduction in the availability of power is an impact to Southeastern's preference customers. The municipalities and cooperatives which benefit from project generation are heavily dependent on their government allocation of capacity and energy to meet their peak loads. Many of them have been preference customers for 50 years. They have designed their electrical systems considering the government generation as an important part of their systems' peaking resource. Any reductions in the level of benefits available to them should be accompanied by an appropriate level of compensation.
Southeastern understands the complex task which has been undertaken by the Mobile District and looks forward to working closely with the District on this process, and in arriving at a plan which balances the needs of the basin. Sincerely. Herbert R. Nadler, Acting Assistant Administrator For Power Resources

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Comment ID: 298
Author Name: Tom Bartels
Organization:

As you know, the hydropower customers are willing to forego their authorized storage at the projects as long as there is proper compensation. We are certainly not the most vocal of your stakeholders, but we try to be the most reasonable given the millions of dollars we have at stake in your decisions. We are not your enemies in this process. We are merely trying to receive the benefits that we have paid for in the past and continue to pay for. We look forward to being an integral part of this process as it moves forward.

Limit sale of Power Outside the Region (Hydropower)

Comment ID: 565
Author Name: Haywood Smith
Organization:

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.

General Concern (Hydropower)

Comment ID: 48
Author Name: Tanya Blalock
Organization: Georgia Power

Dear Sir or Madam: Georgia Power is providing these comments on the Water Control Manual (WCM) update for the U. S. Army Corps of Engineers (COE) operations of its facilities within the Apalachicola Chattahoochee Flint (ACF) River Basin. We appreciate the opportunity to comment and provide assistance in developing the scope of issues to be assessed in the development of the updated ACF WCM. Georgia Power operates a number of fossil fuel fired steam electric generating and hydroelectric facilities within the ACF River Basin and holds contracts with Southern Power for a total generation of approximately 7100 megawatts of electricity. These facilities are critical components of our generation fleet which provides electricity to the
citizens of this region of the country.

Comment ID: 72
Author Name: Dan Kauffman
Organization:

your generation is down

Critical Yield Analysis (Hydropower)

Comment ID: 55
Author Name: Brian Atkins
Organization:

Each of these objectives is critical to the update process. Moreover, the order in which these steps are completed is significant. It is impossible to evaluate and assess proposed changes to the water control manuals unless the critical yields have been calculated and the baseline is established. Refusing to undertake a complete review and assessment of each of these objectives will ensure that valid water control manuals will never be developed and that additional conflicts over the Corps' operations of the federal reservoirs in the ACF Basin will follow. The first objective that must be accomplished is to update the critical yield analysis for Lake Lanier, West Point Lake and Lake Walter F. George (Lake Eufaula), Lake. Without an accurate determination of the amount of water that is available to address the competing demands for water and water storage in the driest of conditions, it will be impossible for the Corps to develop water control manuals that establish operations that are consistent with Congressional intent and satisfy the purposes for which Congress authorized each project. The critical yield analyses for the federal reservoirs in the ACF Basin have not been revised to reflect 2007 drought conditions. Indeed, in the past, the Corps has failed to use then-existing droughts of record to calculate the critical yields; instead deciding that the then-existing drought of record was an outlier and could be ignored. Failure to develop a critical yield analysis based upon the actual drought of record cannot be repeated. Because the conditions in 2007 established a new drought of record, the State of Alabama respectfully requests that the Corps update its calculation of the critical yields from the federal reservoirs, particularly Lake Lanier, as a first step in its effort to update the water control manuals. The determination of the critical yield should be done in an open and public process that includes input from stakeholders throughout the ACF Basin. Before the critical yields are
finalized, the Corps should conduct one or more public hearings to allow the public to provide input into the process, particularly any modeling or operating assumptions used to make such calculations. Alabama believes that until the critical yield calculations are updated, any effort to update the water control manuals will be incomplete. The critical yield calculations should consider the inventory of all existing pipes withdrawing water from or discharging treated wastewater to any of the federal reservoirs, including the elevation within the reservoir of each such pipe, and the need to meet downstream minimum flow requirements at Peachtree Creek (750 cfs), Columbus and Phenix City (1,850 cfs) and Plant Farley (2,000 cfs). After the critical yields of the federal reservoirs are determined, the Corps needs to establish the baseline conditions against which any proposed modification to the water control plans will be judged or assessed. Alabama believes the Corps should use the 1959 water control manual for Lake Lanier, the 1975 water control plan for West Point Lake, the 1965 water control plan for Lake Walter F. George, and the 1972 water control plan for Lake Seminole/Jim Woodruff to determine whether there is sufficient water available in each reservoir to meet the Congressionally authorized project purposes of hydroelectric power generation, flood control, and navigation support for the ACF System and to provide water storage for the specific amounts of storage currently under an existing, valid contract.

Hydropower Impacts (General - Manual)

Comment ID: 168
Author Name:
Organization:

300 PREFERENCE CUSTOMERS DOES NOT APPEAR TO BE MANY IN THE S.E.AREA TO BE EVEN A MINOR REASON FOR THE DAMNS.

Comment ID: 298
Author Name: Tom Bartels
Organization:

Many purposes have been added since the original Congressionally authorized purposes were established. Recent operations have led many "stakeholders" to believe that their purposes are even more important than the original ones that pay the bills. Without hydropower as a purpose,

none of the dams would have been built. When the Corps adds other operations without considering the impact on hydropower, it destroys the economics of the system. When the Corps uses its 'operational flexibility' to approve certain added purposes while "hiding behind" the same operational flexibility to prohibit others, it opens itself up to lots of criticism.

Comment ID: 662
Author Name:
Organization:

WE NEED TO SAVE THE WATER ON LAKE LANIER AS MUCH AS POSSIBLE!
THE CORP. SHOULD SLOW THE AMOUNT OF WATER BEING SENT DOWN STREAM UNTIL THE LAKE GET'S BACK TO FULL POOL.
WE UNDERSTAND THAT NO ONE CONTROLS THE AMOUNT OF RAIN WE RECEIVE BUT WE CAN LIMIT THE AMOUNT OF WATER RELEASED.

Power Generation (Socioeconomics)

Comment ID: 160
Author Name:
Organization:

The generation of power is a critical aspect of West Point Dam and needs to be given full support politically and economically in future planning.

Comment ID: 500
Author Name: Greater Hall Chamber of Commerce
Organization: Hall Chamber of Commerce

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 I 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.

Comment ID: 503
Author Name: Kit Dunlap
Organization: Hall Chamber of Commerce

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 I 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.

Power and Electricity (Infrastructure and Utilities)

Comment ID: 343
Author Name: *Helen F. Henry
Organization:

and I am very interested in developing alternative hydro power and solar energy resources to be used and to promote jobs in our area.

General (Infrastructure and Utilities)

Comment ID: 357
Author Name: *Edna Foster
Organization:

I hope that when the next administration allows for greater funding for infrastructure, whatever will allow the needs of Fla. to be met without jeopardizing the lakes north of them.