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BIOLOGICAL RESOURCES

FISHERIES

Wildlife and Fisheries (Biological Resources)

Comment ID: 19
Author Name: Bill Thomas
Organization: Georgia Outdoors, Inc.

2. Environmental impact. While the corp. seems so concerned with the down stream environment, why is there no concern for the environment up here? The following are just a few of the issues that I have notice, but don't seem to be addressed. A. Dyeing fish and mussels on Lake Lanier. We have mussels dyeing all over our lake, not to mention fish lying on dried up banks. Why is this not a consideration of the corps? Why does the environment up here take back seat to the river below?

Comment ID: 26
Author Name: Donald Smiley
Organization:

Okay. My name is Donald Smiley. I live in Wewahitchka, Florida at 161 Bozeman Circle. I am a local resident. I'm also a beekeeper, and my livelihood depends on the health of the river system, specifically Tupelo Honey trees, Ogeche Tupelo, which produces Tupelo honey. My main concern is the lack of water and waterflow in the lower Apalachicola River System. The Tupelo tree depends on wetland, we forested areas. The tree needs water on its roots, specifically -- especially during springtime when it needs to bud out, and I've been on the river system my whole life. I was born here in Wewa, fished and worked on the river. My livelihood is pretty much always depending on river system. What i've seen is a lot of Tupelo trees that used to be there are gone. They've died out because of the lack of water. I see wetland that used to be wet that's dry. Upland trees, hardwoods and other types of trees have encroached into areas where it used to be Tupelo trees. The Tupelo can't survive there any longer, because there's no water there.

Basically, we have a lack of water flow in the river system, and until we get enough water flow back into the system, we are going to continue to see certain forested areas disappear, certain species of tree disappear, and I read a report just this morning that stated 44 percent of Ogeche Tupelo is gone, disappeared, died off so that concerns me. I see fish habitat destroyed. The fish in the river system, they are just not there anymore, not like it used to be. The whole contour of the river system is changed. It's straighter than it used to be. There's more sandbars than there used to be. The back water sloughs that used to be there are gone. There's no water in the them where there used to be water in them year round. They are gone. That's fish habitat, wildlife habitat.

Comment ID: 30
Author Name: Joseph Parrish
Organization:

My name is Joseph Parrish, Franklin County Commissioner. I would like to enter some comments in this scoping process. I would like to see a true assessment, environmental impact statement and an assessment done of the Apalachicola Bay and the detrimental effects that the low flows have caused during the years 2006-2007. There are statistical data available through the Florida Fish and Wildlife Service that shows the reduced landings of the crab, shrimp, oysters, pinfish, all of these things, and it's very well documented as to how the low flows have impacted the Apalachicola Bay, but I do not think that they are being taken into consideration. I would like that done during your time, during your Environmental Impact Statement, and your water control plans.

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

We recommend that you include within the EIS a Biological Assessment of effects on these

species and their designated critical habitats as required by the implementing regulations (50 CFR §402.12) for section 7 of the ESA. From our previous consultations with you on the releases from Woodruff Dam, your staff is already aware of the sources of information about listed species and their habitats in the action area, and also of the kinds of assessment methods that we consider most useful in evaluating potential changes in flows. Nevertheless, our staff biologists are available to assist you with developing appropriate content for the assessment. Likewise, we will coordinate with you a schedule for completing section 7 consultation in advance of your Record of Decision. In addition, each of the three states maintains databases of rare and imperiled species that may receive protection under state laws. We encourage the Corps to contact the states directly and obtain current lists of resources of concern to the state fish and wildlife agencies that could be affected by project operations. Web addresses that provide contacts and resources information are: Alabama: http://www.outdooralabama.com/research-mgmt/6/ Florida: http://myfwc.com/imperiledspecies/ http://www.fnai.org/ Georgia: http://www.georgiawildlife.com/rareorendangeredspecies_conservation.aspx

National Wildlife Refuges -- A principal resource of interest to the Service is the Eufaula National Wildlife Refuge, which is associated with the W.F. George project. The refuge is managed for migrating and wintering waterfowl, nesting wood ducks, colonial nesting birds, neotropical migrant birds, and wood storks. Recently, the refuge has hosted some of the whooping cranes that belong to the newly established eastern flock, which migrates between nesting areas in Michigan and wintering areas in Florida. Many of the shorebirds and waterfowl species rely upon the mudflats, shallows, and backwater areas of the reservoir that are within the refuge; therefore, the manner in which reservoir levels are controlled is highly relevant to wildlife habitat conditions at this refuge. In addition, the refuge pumps water from the reservoir in the fall to flood croplands located in several off-reservoir impoundments. These impoundments may attract up to 75 percent of all waterfowl on the refuge, which number about 10,000-15,000 birds in most years. Filling these impoundments is dependent on a reservoir level greater than about 185 ft above mean sea level, which is the case in mid to late October in most, but not all years

Fish Passage – The Corps' ACF dams have impeded the migration of several migratory fish species for several decades, including the striped bass, Alabama shad, American eel, and Gulf sturgeon. It is possible that the Corps might operate the lock at Woodruff Dam in a manner that would facilitate fish passage at this downstream-most barrier in the basin. We recommend that the Corps continue to support and facilitate research on fish passage at Woodruff Dam, and other ACF federal dams as appropriate, with a goal of identifying and implementing operations that would allow riverine species to travel their historic migratory pathways. Such procedures should be incorporated in the WCM, as appropriate.

Apalachicola Bay Habitats and Fisheries – The biological organization of Apalachicola Bay is controlled largely by riverine influences on its salinity, turbidity, and sedimentation rates (Livingston 1991). We encourage the Corps to apply a spatially-explicit hydrodynamic model of the bay to assess the effects of alternative operations on salinity regimes, and in turn, on the relative distribution of salt marshes, submerged grass beds, and oyster bars in the bay.

Reservoir Fisheries -- Sport fisheries are important recreational and economic resources in all of the federal ACF reservoirs. Important sport fish in all five reservoirs are the largemouth bass and crappie, but each reservoir supports a mix of several additional species, including walleye (Lake Lanier only), striped bass, bluegill, spotted bass, redear sunfish, and others. Based on interviews of fisheries managers and researchers in the basin, Ryder et al. (1995) identified the species considered critical in an evaluation of operating alternatives and the relative acceptability of reservoir levels for these species. The Service cooperated with the Corps for the 1998 draft EIS for ACF water allocation to develop a reservoir fisheries performance measure using the findings of Ryder et al. (1995). We recommend that the Corps update this performance measure in light of any new information developed in the past 10 years, and use it to evaluate the relative impacts on reservoir sport fisheries of alternative operating plans

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Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

ADCNR recommends that the COE review existing data and conducts monitoring studies to determine the present state of aquatic wildlife in river reaches below projects. Using an adaptive

process, the COE should evaluate various modeled flows for COE projects to mimic a natural flow regime throughout the ACF. The biological response produced by the environmental flows would be evaluated, and if deemed necessary, adjusted to meet the objective of maintaining ecological integrity.

Species of Greatest Conservation Need (CCN) Congress through the Wildlife Conservation and Restoration Program (WCRP) and the State Wildlife Grants (SWG) Program required each state fish and wildlife agency to design and implement a comprehensive approach to the conservation of America's resources by October I, 2005. Alabama has completed the "Comprehensive Wildlife Conservation Strategy" (CWeS), and the plan is in the implementation phase. Altogether, 314 aquatic and terrestrial wildlife species were identified as in greatest conservation need. These GCN fauna include 24 mammals, 26 reptiles, 14 amphibians, 28 birds, 57 fish, 93 mussels, 34 aquatic snails and 28 crayfishes. GCN species are associated with 15 key habitats and 15 river basins. Threats and conservation actions have been identified for each GCN species. Recommendation: ADCNR recommends the development of a new water control manual for the ACF which should reflect wildlife conservation actions identified in Alabama's CWCS where appropriate. Sincerely, WILDLIFE & FRESHWATER FISHERIES Stanley F. Cook, Chief of Fisheries

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Comment ID: 71
Author Name: Steven J. Herrington
Organization: The Nature Conservancy

Reaching consensus on environmental flow requirements is a complex process. It involves scientists and engineers from many disciplines using existing data to define the basic flow regime required to support the native fauna and functions of the river ecosystem.

Potential impacts on migratory fishes related to USACE operations should be considered in the upcoming EIS.

Comment ID: 96
Author Name: Lynn Wilson
Organization:

Save our water/wildlife system

Comment ID: 170
Author Name: Sammy Bailey Jr.
Organization:

I would love to see the fish habitat to gain from a higher lake level.

Comment ID: 184
Author Name:
Organization:

We live on the lake, near long cane park and find it beautiful and perfect for recreation when at or near full pool. it was a great disappointment during the drought of 2007 to see thousands of muscles drying and dying in the mud flats.

Comment ID: 213
Author Name: Donna Garrett
Organization:

We also had dead mussels on the dry land at our house when the water was down.

Comment ID: 218
Author Name: CHARLES
Organization:

Thirdly, our wildlife depends upon the water levels to survive. We need to support their life which in turn supports our life through food sources and oxygen. These are three reasons in my opinion which support leaving our lake levels at full pool for the various seasons.

Comment ID: 224
Author Name:
Organization:

Then, proponents of this higher lake level bring up last year's low summer level: they want to prevent that from happening again. Well, that drop was natural. We were in a drought. If you took the time to drive around and look at farm ponds and other lakes, they were down too. And look at how much the wildlife benefited from that drop. The exposed shoreline allowed plants to grow and flourish, which in turn provided cover and food for fish. Also, you could see deer browsing along the shorelines. Even ducks benefited from the grasses and forbs which grew along the shoreline as the water came back up.

Comment ID: 262
Author Name: Louis j. cue
Organization:

Concerned about the water level being so low. I am a avid fisherman, fishing at least three times a week.
The last three years, the fishing has declined greatly. I FISH FOR CHANNEL CAT IN PERTICKLY. ANY MORE YOU HAVED TO FISH ALL DAY JUST TO CATCH 5 OR 6 FISH. I MOVED DOWN HERE 8 YEARS AGO JUST FOR THE FISHING. I MOVED HERE FROM LANSING, IOWA. HAD A BAIT SHOP FOR 28 YRS AND A GUIDE SERVICE. WORKED WITH THE DNR AS A ADVISER AND FISHING REPORTER. AS I SEE IT,THE FISHING IN THIS AREA OF FLOIDA HAS GREATLY DECLINED. SOME PEOPLE SAY THAT THE FLATHEAD FISH HAS TAKEN OVER THE RIVER SYSTEMS. I FISH FOR PANFISH ALOT TOO. SAME DEAL. HARD TO CATCH A MESS.I HAVE WATCHED THE DNR SHOCKING FOR CHANNEL CAT WITH VERY LITTLE SUCESS.I THINK FISHING BEDDING FISH IS A BIG MISTAKE.I DON'T DO THAT. MAY BE THE FLATHEADS HAVE SOMETHING TO DO WITH IT. THANK YOU KEEP ME INFORMED.

Comment ID: 263
Author Name: Daniel H. Cox
Organization:

I have lived my whole life within the ACF basin and can attest to the fact that the lack of fresh water in the downstream system has altered the biology of the flood plains and caused long term ecological damage to the system.

Comment ID: 280
Author Name: Joshua Norred
Organization:

Our local wildlife (Osprey) depend on the levelized water in West Point Lake. their were several Nest affected by the lower/fast rising Water levels than ever before, this year 2008.

Comment ID: 296
Author Name: Kathy Nguyen
Organization:

It is clear before Lanier the species in Apalachicola Bay were able to survive water level fluctuations.

Comment ID: 297
Author Name: Jackson
Organization:

From the wildlife point of view (clams in Florida etc.) if we consider that since the last Ice Age (15,000 years or so) the Chattahoochee watershed has probably run DRY a couple of hundred times, the clams have survived. Balancing input and output flows and only releasing to match water usage downstream (and still require conservation) appears a more sustainable way to manage the resource for both water needs of North Georgia, the border areas of Georgia, Alabama and Florida, and recreation etc. on the Lake.

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From the wildlife point of view (clams in Florida etc.) if we consider that since the last Ice Age (15,000 years or so) the Chattahoochee watershed has probably run DRY a couple of hundred times, the clams have survived.
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From the wildlife point of view (clams in Florida etc.) if we consider that since the last Ice Age (15,000 years or so) the Chattahoochee watershed has probably run DRY a couple of hundred times, the clams have survived.

Comment ID: 311
Author Name: Stephen Scanlan
Organization:

The importance on the flow of fresh water in this eco-system may not be realized until it is too late. If this estuary life supporting and as well a life producing is lost due to fresh water flow we all lose as well as our children and grandchildren.

Comment ID: 338
Author Name: Ruth Perdue
Organization:

Lake levels drop too much when spawning is taking place.

Comment ID: 394
Author Name: Robert Kopp
Organization:

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

Comment ID: 433
Author Name:
Organization: n/a

Mussels etc are not a reason to draw down Lake Lanier to levels which can raise the toxicity of the water and end up killing our fish. Their lives, not to mention the recreational value of Lanier are important as well.

Comment ID: 467
Author Name: Susan Garchow
Organization:

Lake Lanier's fish and clams and water quality is suffering because of low water levels.

Comment ID: 489
Author Name: John Mock
Organization:

From my point of vision in this issue I sometimes wonder why reason does not take hold and politics put aside. As an example, the Corp of Engineers has a better view of Lake Lanier from their offices at Buford Dam then I do from my house and I knew a month before they did that they were dumping water out of the lake when they had their faulty "water level gauge" problem last year. And, how come it is OK to kill tens of millions of :fresh water mussels around the shorelines of Lake Lanier by dropping the water level yet the Corp is reluctant to drop the flow of water in the Apalachicola River below 5000 cfs because "5000 cfs is lowest rate they have ever allowed in the river", even though there is no evidence that the river could not reasonably sustain itself at a lower rate of flow. Since this rate has never gone below 5000 cfs I would find it hard to believe there is any relationship to oysters. When the Corp dredges the mouths of the 28 tributaries that feed the Apalachicola River they research each of the tributaries mouths for endangered muscles and when found they relocate the muscles to another part of the river. In the 2002 study only 3 of the 28 mouths of the tributaries had the endangered muscles. So, if it is ok to move muscles for dredging purposes why not move them to accommodate a reduced rate

in the flow of the river?

Comment ID: 496
Author Name: James & Martha Burwell
Organization:

The water level in Lake Lanier should not be depleted for the purpose of supporting mussels and other pre-historic species in the Apalachicola River at the expense of Georgia's human inhabitants.

Comment ID: 523
Author Name: Jack Griffeth
Organization:

I am an avid environmentalist who realizes this drought is severe enough to negatively impact the mussels even without Lake Lanier.

Comment ID: 545
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.

Comment ID: 559
Author Name: Roy Beavers
Organization:

These species should be resilient enough to endure drought conditions and excessive withdrawal from Lanier artificially creates a non-natural environmental condition for them.

Comment ID: 572
Author Name: Billy Turner
Organization: Columbus Water Works

Intertwined with these uses is our determination to see this regions aquatic ecology protected.

Comment ID: 574
Author Name: G. Eucle Vickery
Organization:

[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.

Comment ID: 598
Author Name: Brian Otte
Organization:

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

Comment ID: 656
Author Name: Tom Stratton
Organization:

Much has been made of the danger to a few mussels in Florida, but I have seen thousands of dead fresh water clams along the shore of Lake Lanier. A consideration of other wildlife destruction caused by the low water levels should be considered. What has happened to the beavers, otters, ospreys, and eagles, not to mention the many species of fish that lost cover and lost spawning areas? What is the environmental impact of losing the habitat for these animals?

Comment ID: 664
Author Name: J. Gordon Shuler
Organization:

Our community (Franklin County, Florida) depends on the river and bay for its livelihood and culture. We live in an area that is unique in all the world, and it should be protected. Our area is bio-diverse and is teeming with wildlife, aquatic bounty and people who love it.

Comment ID: 758
Author Name:
Organization:

The description given about the bay should also include statements about the numbers of other salt water species that depend on the bay, estuary, and river as part of their life cycle (fish breeding grounds, etc.) This system not only supports Gulf Coast wildlife, but the Gulf Coast sport fishing and commercial fishing industry as well.

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

7. Good science needs to be used to determine fish and wildlife needs.

Comment ID: 763
Author Name: James H. Phillips
Organization: Middle Chattahoochee Water Coalition

Good science needs to be used to determine fish and wildlife needs.

Comment ID: 783
Author Name: Susan Bassett
Organization: Boardwalk Realty

The Apalachicola Bay is a national as well as local natural resource that is one of the most precious gifts we have been given.

Comment ID: 797
Author Name: Greg
Organization:

There has gotten to be a significant impact to the wildlife of the lake. Areas fish and other animals used are now gone.

Comment ID: 809
Author Name: Tim Perkins
Organization: Forsyth County

Consideration should not be given to maintain the trout below the dam as this is not a natural environment that environmentalist are always asking for. This is an artificial trout stream, the species being stocked are not native fish. Releases from the dam to maintain temperature should not be allowed.

Improve Lake Fisheries (Fish and Wildlife)

Comment ID: 45

Author Name: Gail Carmody
Organization: Fish and Wildlife Service

National Wildlife Refuges -- The Service has previously recommended to the Corps a seasonal pattern of reservoir levels at W.F. George Reservoir/Lake Eufaula that would best accommodate the needs of Eufaula National Wildlife Refuge. The principal concerns of the refuge relative to reservoir management are for water levels that provide seasonal habitat for a large number of migratory bird species, for control the spread of undesirable aquatic vegetation, and to allow the manipulation of off-reservoir impoundments for waterfowl. These recommendations, which we reiterated in our draft Fish and Wildlife Coordination Act report for the Corps' 1998 draft EIS on ACF water allocation, are to manage the reservoir so that it behaves more like a river. We recommended an annual pattern cycling between the highest levels (190 ft) in the late winter and early spring to the lowest levels (185 ft) in the late summer. These recommendations are still valid, and we request the Corps to consider how the benefits and impacts of such a scheme compare with the existing operating regime and other alternatives

Fisheries Management -- The Corps has been following a draft Standard Operating Procedure (SOP) for “Lake Regulations and Coordination For Fish Management Purposes” for several years. The “fish spawn” SOP establishes a general goal of managing for generally stable or rising reservoir levels and for generally stable or gradually declining river levels for about 4 to 6 weeks in the spring months. We would like to cooperate with the Corps and the wildlife agencies of the three states in the coming months to explore ways to incorporate this draft SOP into the mix of alternatives that are evaluated in the WCM update.

Comment ID: 67
Author Name: Jeff Lukken
Organization: Mayor of LaGrange

The City of LaGrange lies adjacent to West Point Lake in west central Georgia. No single public resource in the west Georgia, east Alabama region exerts more social, environmental, and economic influence than the West Point Lake Project. As such it is important that Scoping for the Environmental Impact Statement for updated and new Water Control Manuals for the Apalachicola-Chattahoochee-Flint River system recognize that critical operating changes must be made at West Point Lake for the project to fulfill its obligations as mandated by Congress when it authorized the project in 1962.
Congress established 5 specific PRIMARY authorized uses for the project:
• Hydropower
• Sport fishing and Wildlife development
• General recreation
• Navigation
• Flood Control
In the report of the Corps Chief Engineers to Congress it was clear that General Recreation and Sport fishing and Wildlife development when combined carried along with hydropower development the vast majority of the financial benefit assigned to the project. This report was completed in the context of development and social economic activity of the era around 1962 when west Georgia and east Alabama were largely rural and undeveloped.
Since that time, changes have occurred in this region that demand even more attention by the Corps of Engineers on the primary authorized uses of sport fishing, wildlife development, and general recreation. This region is growing rapidly and is now totally surrounded by the massive population growth of the Atlanta, Auburn Opelika, and Columbus MSA's. New influences have taken over and control the environment and socio-economic factors that relate to the utilization of the lake. Many of these have not been addressed or are ignored by the Corps in its operations. These include massive urbanization and growth of the area and counties surrounding the lake, industrial development form sources such as the KIA manufacturing complex, the growth of the Fort Benning complex and its contingent of citizens and soldiers that often rely on West Point Lake's facilities for recreation and sport fishing and wildlife. Yet what we have observed is that the Corps operates the lake and the system in its own way that ignores the original PRIMARY congressional authorizations while focusing exclusively on flood control needs, and addressing downstream and upstream demands that may not even meet the purposes set forth by Congress.

Comment ID: 68
Author Name: Dick Timmerberg
Organization: West Point Lake Coalition

On behalf of the West Point Lake Coalition and its approximately 1,200 members and its Corporate Sponsors, we submit the following comments as part of the Scoping Process
No single public resource in the west Georgia, east Alabama region exerts more social, environmental, and economic influence than the management and operations of the West Point Project. As such it is important that Scoping for the Environmental Impact Statement for updated and new Water Control Manuals for the Apalachicola-Chattahoochee- Flint River system recognize that critical operating changes must be made at West Point Lake for the project to fulfill its obligations as mandated by Congress when it authorized the project in 1962.
Congress established 5 specific PRIMARY authorized uses for the project:
• Hydropower
• Sport fishing and Wildlife development
• General recreation
• Navigation
• Flood Control
In the report of the Corps' Chief Engineers to Congress it was clear that General Recreation, Sport Fishing and Wildlife Development, and Hydropower comprised the vast majority of the financial benefit assigned to the project. This report was completed in the context of real estate/industrial development and social economic activity of the era around 1962 when west Georgia and east Alabama were largely rural and undeveloped. That has all changed! This region is growing rapidly and is now totally surrounded by massive population growth in the surrounding MSA's of Atlanta, Auburn/Opelika, and Columbus. New influences have taken over and control the environmental and socio economic factors that relate to the benefits and utilization of West Point Lake. Many of these have not been addressed and/or have been ignored by the Corps in its operations. These include massive urbanization and growth of the area and counties surrounding the lake, industrial development from sources such as the KIA manufacturing complex, the growth of Ft. Benning, and its contingent of citizens and soldiers that often rely on West Point Lake's facilities for recreation and sport fishing and wildlife
What we observe is that the Corps operates West Point Lake specifically and the ACF system in general in a way that ignores the original, PRIMARY congressional authorizations as a group and focuses extensively on flood control as well as downstream and upstream demands that do not meet the purposes set forth by Congress.

Comment ID: 107
Author Name: Ken Weathers
Organization:

I urge the Corp to always consider the impact on fisheries and recreation in water allocation decisions. Lake Eufaula has been held at full pool this spring and summer, and we have excellent recruitment of largemouth bass and the best sunfish fishery we have ever had at Eufaula.

Comment ID: 153
Author Name: Debra Nix
Organization:

It is a shame to consider the species in the lower basin in FL as more important than the species of wildlife in the upper river basin and in West Pt. Lake. I have seen years where the bass and bream are spawning and the water level is dropped by the Corps which devastates the new hatchlings in the lake. It is cruel and ridiculous for the Corps to be that irresponsible.

Comment ID: 338
Author Name: Ruth Perdue
Organization:

Lake levels drop too much when spawning is taking place.

Comment ID: 582
Author Name: Danny Rock
Organization:

3] continue to improve the fishery and habitat

Commercial Fisheries (Biological Resources)

Comment ID: 13
Author Name: Noah Lockley
Organization: Franklin County Board of County Commissioners

And as importantly, the oyster, more than any other resource in the Bay needs to be protected from the loss of freshwater. The oyster is valuable to the ecosystem in two ways. It is a filter feeder, and oyster beds sift large volumes of water every day which help maintain water quality of the Bay. Additionally, oyster beds, and their associated spat, are critical parts of the food chain in the Bay. Large sections of the Bay no longer produce oysters because they are not receiving enough freshwater to survive, much less grow and produce spat. The Board hereby requests the freshwater needs of the oyster also be included in the EIS.

Comment ID: 29
Author Name: Van Lewis
Organization:

My name is Van Lewis. I live at 4434 St. Teresa Avenue in Eastern Franklin County. My mailing address is P.O. Box 323, Panacea, 32346. I'm a resident of Franklin County and voter here, and I would like to give a statement about the water situation in the Apalachicola River. I want to complain in particular about the governor of Georgia saying that what is at issue down here is some rare species of freshwater muscle. I don't know if the governor of Georgia has ever heard of oysters or crabs or mullet or trout or redfish or snapper or grouper or clams, but he is either extremely ignorant making a statement like that or he is lying and misrepresenting the truth about the entire ecosystem down here that is dependent upon normal freshwater flows increasing and decreasing flows, floods and slow of flows. We need not just a constant supply of water, but a variable supply of water for this ecosystem to work. It's a very important ecosystem, and the governor of Georgia did a great disservice to himself and to the people of our country by saying that all we needed water for was a rare species of muscles. I am very angry about it.

Comment ID: 30
Author Name: Joseph Parrish
Organization:

My name is Joseph Parrish, Franklin County Commissioner. I would like to enter some comments in this scoping process. I would like to see a true assessment, environmental impact statement and an assessment done of the Apalachicola Bay and the detrimental effects that the low flows have caused during the years 2006-2007. There are statistical data available through the Florida Fish and Wildlife Service that shows the reduced landings of the crab, shrimp, oysters, pinfish, all of these things, and it's very well documented as to how the low flows have impacted the Apalachicola Bay, but I do not think that they are being taken into consideration. I would like that done during your time, during your Environmental Impact Statement, and your water control plans.

Another issue that they really need to look at is the flows that we need down the Apalachicola River at key times of the year. Just as your flowers bloom in March, so do our fish spawn. We must have our flood plain inundated and flooded in the months of January and February so that we have a good spring spawning season in the month of March, which is very key to our success here in our local economy. It's also very key to the successful season that we have in our estuary in maintaining our fisheries and our habitat for those fish. Another key time for the flood that we need and inundation of the flood plain is in July. Those are two key times, in January and also in July for the oyster spat, which is a microorganism that creates new oysters here in Apalachicola Bay. Those oysters are the key to our water quality. They are a natural filter feeder. They filter out the contaminants coming down the river from other points coming into our bay, and without those oysters, we lose our water quality. If we lose our water quality, we lose our entire bay. Those oysters are the key to that. Without those, we have nothing here in Franklin County, and I would like for you to very seriously consider those impacts that are

happening from the top to the bottom, and really look at the way the federal system is managed and manage it in a federal way, which is in the best interest of all of the users up and down the river system here. That's it.

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

In addition, flows in the Chattahoochee River sufficient to support navigation will be beneficial to the natural resources of the Apalachicola River and Apalachicola Bay. While a minimum flow of 5,000 cfs has been established for the benefit of certain species protected under the ESA, it is the position of Apalachicola Bay and River Keeper and the Franklin County Seafood Workers that those minimum flows do not adequately protect the Bay and its other resources, including commercial fisheries and other ecological resources, on a sustained basis. Like TRWDA, MWV believes that flows sufficient to meet Middle and Lower Chattahoochee requirements would increase the frequency of instances when flows below Woodruff exceed 5,000 cfs, particularly when combined with contributions from the Flint River. d

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Comment ID: 42
Author Name: Tom Oliver
Organization: Hall County Government Board of Commissioners

2. Lake Lanier should not be drawn down for the protection of rare mussels or other endangered species in the Apalachicola River; it is disingenuous of those promoting this rationale for drawing down lake levels in Georgia to hide behind the Endangered Species Act. A single dry season is highly unlikely to wipe out species which have survived many hundreds of thousands of years without the benefit of flood control dams along the Apalachicola, Chattahoochee and Flint River Basins. It leads one to believe that the real issue is the economic value of the Florida oyster harvest;

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Apalachicola Bay Habitats and Fisheries – The biological organization of Apalachicola Bay is controlled largely by riverine influences on its salinity, turbidity, and sedimentation rates (Livingston 1991). We encourage the Corps to apply a spatially-explicit hydrodynamic model of the bay to assess the effects of alternative operations on salinity regimes, and in turn, on the relative distribution of salt marshes, submerged grass beds, and oyster bars in the bay.

Comment ID: 76
Author Name: Allen Boyd
Organization: U.S. Congress

Chronic drought conditions in the southeastern U.S. have led to dramatic decreases in the quantity of water entering the ACF system. Both these natural fluctuations in water supply and human-related uses have led to unprecedented reductions in freshwater inflow entering Apalachicola Bay. The water and nutrients that the Apalachicola River delivers to the bay are critical to the health and productivity of the estuary and adjacent coastal waters of the Gulf of Mexico. This area supports significant recreational and commercial fisheries, including oysters (90 percent of Florida's fishery), shrimp, grouper, and other high-value species. As such, the baseline for scoping should include an analysis of all impacts not only to the Apalachicola River, but to the Apalachicola Bay ecosystem that depends on the fresh water flows from the river.

Comment ID: 91
Author Name: alan pierce
Organization:

I very concerned that the Apalachicola Bay ecosystem is not being considered when it comes to developing the Water Control Manual. The Bay is the most pristine and productive body of water in the southeastern US. Everybody benefits from the shrimp, oysters, blue crabs, etc that come out of the Bay. Please include the Bay in the Environmental Impact Statement.

Comment ID: 94

Author Name: Joe J. Shields
Organization:

The Bureau is responsible for conducting oyster population assessments; determining optimal location for oyster reef construction by evaluating site characteristics; and restoring historically productive public oyster reefs through cultch deposition, transplanting and relaying projects.

Starting in late March 2007, Bureau personnel began observing significant oyster mortality events in St Vincent Sound (western Apalachicola Bay). During the 2007 and 2008 summer seasons, oyster mortalities were observed on oyster bars closer to the mouth of the Apalachicola River. During our most recent sampling this month, we observed mortalities throughout Apalachicola Bay; with higher mortalities observed on Catpoint and Easthole Bars in St. George Sound.

This pattern of observed mortality is associated with the Apalachicola River's influence, reduced freshwater inflows, elevated salinity and other environmental stressors. We attribute the most recent high mortality levels observed to a combination of factors which are exacerbated by reduced freshwater inflows - Most notably, predation by organisms with marine affinities (store crabs and oyster drills). These predators increase during periods of high salinities and high water temperatures. This quarter's sampling yielded significant predation observations. Additionally, we did not observe the smaller class sizes (i.e. the future crop) throughout our sampling regime in Apalachicola Bay - this too is indicative of predation. Lastly, we observed a loss of total numbers of oysters throughout our sampling regime.

If adverse environmental conditions (e.g. reduced freshwater inflows) persist, then the ecology of Apalachicola Bay will be disrupted of shifted, and oyster habitat and oyster populations will become debilitated.

Comment ID: 122
Author Name: Berny D. Ilgner
Organization:

Maintaining minimum flows in the Apalachicola River into the bay is critical to the oyster ecosystem. Will the study determine what minimum flows are necessary to ensure that the salinity of the St. George Sound is not too high for maintaining a vibrant ecology in the bay?

Comment ID: 737
Author Name: Carol Schwarz
Organization:

A baseline of health of the species in the Apalachicola Bay, particularly those harvested for food needs to be done. The existing health and abundance of harvested seafood needs to be measured and correlated to the flow of fresh water from the Apalachicola River.

Comment ID: 738
Author Name: Carol Schwarz
Organization:

Again a measurement of the health of the species (particularly those harvested for seafood) in the Apalachicola Bay needs to be done. This measurement then needs to be correlated to the flow (amount) and quality of the water coming the Apalachicola.

Facilitate Migratory Fish Passage (Fish and Wildlife)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Fish Passage – The Corps' ACF dams have impeded the migration of several migratory fish species for several decades, including the striped bass, Alabama shad, American eel, and Gulf sturgeon. It is possible that the Corps might operate the lock at Woodruff Dam in a manner that would facilitate fish passage at this downstream-most barrier in the basin. We recommend that

the Corps continue to support and facilitate research on fish passage at Woodruff Dam, and other ACF federal dams as appropriate, with a goal of identifying and implementing operations that would allow riverine species to travel their historic migratory pathways. Such procedures should be incorporated in the WCM, as appropriate.

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

Fish Passage
Dams, in most cases, block the movement of catadromous, anadromous, and riverine fish species. This has resulted in fragmentation of native fish ranges which will disrupt life cycles of fish that depend on movement to specific locations to spawn, overwinter or over summer. Long term river fragmentation will result in reducing the size of the gene pool and restricting genetic diversity. Mussel populations will also be impacted by fish movement restrictions since fish are necessary to complete their life cycle. Recommendation: ADCNR recommends that the COE establish a goal to develop a fish passage plan for all COE locks and dams in the ACF. A fish passage plan should identify key species which need upstream and downstream movement. With those species in mind, evaluate viable fish passage methods. A lock passage program similar to the one currently employed by the COE at Woodruff Lock and Dam would be a good starting point. This would greatly benefit adult migratory fish such as striped bass, Alabama shad, American eel, Gulf sturgeon, and many other fish species.

Comment ID: 71
Author Name: Steven J. Herrington
Organization: The Nature Conservancy

Continuation of fish passage operations at Jim Woodruff Lock and Dam
In 2004, the USACE began collaborating with the Conservancy, the U.S. Fish and Wildlife Service, the U.S. Geological Survey co-op at Clemson University, the Florida Fish and Wildlife Conservation Commission, the Georgia Department of Natural Resources, and several other partners to determine the viability of adjusting the operation of the lock at Jim Woodruff Lock and Dam for improving upstream movement of migratory fish species in the ACF River Basin. Several years of scientific study clearly demonstrated that running the lock at times when migratory fishes, such as the Alabama shad and Gulf strain of striped bass, were moving upstream substantially improved their ability to pass through the lock upstream to over 150 miles of additional riverine habitat for reproduction and other important biological needs. In 2008, The USACE agreed to continue to operate the lock (which does not release any more or less water downstream) to support fish passage. Because this action is critical in the population recovery of migratory fish species, as well as the ecology of the system, the Conservancy strongly supports the continuation of fish passage operations at Jim Woodruff Lock and Dam in the ACF River Basin. In addition, we recommend consideration of similar fish passage operations at other USACE operated facilities throughout the basin.

THREATENED AND ENDANGERED SPECIES RELATED ISSUES

T & E (Biological Resources)

Comment ID: 6
Author Name: Heinz J. Mueller
Organization: EPA

EPA Region 4's NEPA Program Office recommends that the Mobile District address and fully document the following issues in the EIS for the updated ACF Water Control Manual. Adverse impacts from any proposed action should be avoided, minimized, and/or mitigated.
The Mobile District should address and fully document the effects from any proposed action(s) (e.g., revisions to various lake levels, discharge changes in average daily flows, etc.) on any threatened or endangered species.

Comment ID: 42
Author Name: Tom Oliver
Organization: Hall County Government Board of Commissioners

2. Lake Lanier should not be drawn down for the protection of rare mussels or other endangered species in the Apalachicola River; it is disingenuous of those promoting this rationale for drawing down lake levels in Georgia to hide behind the Endangered Species Act. A single dry season is highly unlikely to wipe out species which have survived many hundreds of thousands of years without the benefit of flood control dams along the Apalachicola, Chattahoochee and Flint River Basins. It leads one to believe that the real issue is the economic value of the Florida oyster harvest;

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Resources Threatened and Endangered Species -- The ACF projects affect a large swath of aquatic habitat of fish and wildlife from the Blue Ridge to the Gulf of Mexico, a swath that supports one of the richest aquatic fauna in North America. The Corps is aware of the species and habitats protected under the ESA that are affected by ACF project operations. These species were the focus of our recent consultation for the Woodruff Dam Revised Interim Operating Plan (RIOP). The Corps should address the same ESA-protected resources for the WCM update as for the RIOP: the Gulf sturgeon (Acipenser oxyrinchus desotoi), Fat three ridge (Amblema neislerii), Chipola slabshell (Elliptio chipolaensis), and Purple bankclimber mussel (Elliptoideus sloatianus), all of which have designated critical habitat within the action area. At this time, no species or critical habitats are proposed for protection under the ESA that occur within the action area. Since the WCM update process will span several years, we remind the Corps of the action agency's responsibility under the ESA Section 7 regulations to determine the effects of its proposed action on all listed, proposed, and candidate species and critical habitats that may be present in the action area. The Corps will need to revisit the list of threatened and endangered species periodically during the planning process and must verify the accuracy of its species/habitats list when the agency begins preparing a biological assessment. We encourage the Corps to visit our websites for current species lists and other information: http://www.fws.gov/panamacity/ http://www.fws.gov/athens/ http://www.fws.gov/daphne/

Finally, because populations of several federally listed species were fragmented due to reservoir development, we encourage the Corps to participate with the Service and other federal and State agencies in efforts to locate and monitor extant populations in the remaining unimpounded portions of the Chattahoochee River and its tributaries. Historically, the purple bankclimber, shiny-rayed pocketbook (Hamiota [Lampsilis] subangulata), Gulf moccasin shell (Medionidus penicillatus), and oval pigtoe (Pleurobema pyriforme) were all found in the Chattahoochee River. Except for a single live bankclimber found in Goat Rock Reservoir, all are now extirpated from the mainstem, and isolated populations are known to persist in only three tributaries: Uchee Creek, Sawhatchee Creek, and Kirkland Creek.

Comment ID: 52
Author Name: V.M. Perry, Jr.
Organization: Lake Lanier Association

Maintenance of a Navigation Channel as a Corps Operation We request that navigation be abandoned as a function of the Corps' ACF operations. The Corps' studies have shown that dredging to maintain the required 9-foot channel is not only extremely impractical and costly but directly detrimental to the threatened and endangered species in the Apalachicola River and its environs. The result is a damaged river system that puts additional pressure on upstream resources such as Lake Lanier to compensate for the deteriorating riverbed and deleterious effects on habitat. The state of Florida has refused for a number of years to grant a permit to the Corps for depositing dredged material. Modern-day transportation has reduced the use of the ACF for that purpose to a trickle. Maintaining a navigation channel is an anachronism that should be eliminated from the Corps' operations of the ACF.

Comment ID: 67
Author Name: Jeff Lukken
Organization: Mayor of LaGrange

The Interim Operating Plan (IOP) and the Revised Interim Operating Plan (RIOP) are inherently flawed with regards to their influence on West Point Lake. Major changes in operations were made throughout 2006, 2007, and into 2008 without

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adequate study or understanding of the impacts of IOP and RIOP operations on West Point Lake. No "in depth" study has been made of the presence of, or the
impact on, endangered species or any other fish and wildlife that may exist in the lake or in tributaries in West Point Lake that may be affected by rapid lake
level fluctuations. Stakeholders in the area have observed massive kills of native mussels in the project boundaries when the Corps operates the dam to provide
massive rapid draw downs for downstream flows. No studies of the impacts to flora and fauna have been completed to adequately assess these issues damages
resulting from operations and lake fluctuations.

Comment ID: 318
Author Name: Kim Sak
Organization:

The next thing that I'd like to point out is, I'd like to see, as soon as possible, an environmental impact study done on the endangered species of mussels downstream to determine how much water they need during drought conditions to survive.

Comment ID: 449
Author Name: Bill Morrison
Organization:

If the endangered species of mussels & fish survived years ago with the rivers and streams going up and down with only its control of nature, then why do they need a constant flow today determined by the corps of engineers or whoever??

Comment ID: 493
Author Name: Thomas Vivelo
Organization:

To that end here are some suggested guidelines: 1. The lake should not be released to protect mussels or other endangered species. If the lake was not here, and natural river flow was the only thing supporting those species, they would already be dead. The most endangered species in the Chattahoochee River Basin right now are the humans relying on Lake Lanier for drinking water! ,

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Comment ID: 495
Author Name: Christopher Seeley
Organization:

3) The argument against mussels or any other endangered species. The mussels have been in the rivers for thousands of years. Long before the Chattahoochee River system was dammed and the current man-made lake system was built. In fact, the current system has only been in place for a very short time since the existence of the mussels. Given this long period of time before the dams and lakes where built, he mussels have survived all previous droughts that must have occurred. Therefore, low water levels in the Apalachicola River should not be a threat to their existence. If it is suspected that a species is threatened, have appropriated scientific studies conducted by several independent agencies and/or universities. Relying on the opinion of a few individuals, in one Federal agency, is not only bad science, it is unethical science.

Comment ID: 498
Author Name: James & Pamela Norman
Organization:

Lanier should not be drawn down for endangered species in the Apalachicola River. Allowing natural processes and variations is the best way to protect species in the long run. They have survived many years of drought and many years of high water.

Comment ID: 537
Author Name: Charles Mann
Organization:

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.

Comment ID: 554
Author Name: John Gundlach
Organization:

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: 603
Author Name: Wm T Schwendler Jr
Organization: part-time resident, boater

1.Research needs to be done on the endangered wildlife. Lake Lanier is down almost 19' from full pool, yet we have fresh water mussels in abundance on "my" beach all the way to the water. The largest mussels appeared when the lake was down 7-12 feet, some nearly the size of my fist. It seems to me we don't know how endangered certain mussel species are until we have done some field research about their viability at various points in the water column. The lower river and the area bays near the Gulf can't more than a couple feet, so maybe the endangered species do populate down to the lowest levels.

Comment ID: 604
Author Name: FRED ROBBE
Organization:

Lake Lanier has fresh water clams that should be protected also.

Comment ID: 658
Author Name: Paul E. Andrew
Organization:

The first, endangered species in the ACF Basin. It seems those endangered species are harmed more by significant fluctuations in water levels more so than by "reduced flows." Consequently, the Corp should CAREFULLY consider the minimum amount of water needed to flow into the Apalachicola and the Bay and then insure any water above that minimum flow is retained. This would also assist populations upstream by keeping water storage capacities as high as practical (you should increase the storage level in Lanier also.

Comment ID: 727
Author Name: Mike Sullivan
Organization: City Council for City of Sugar Hill

The Endangered species act needs to be updated. It is one thing to put endangered species ahead of new development. It is quite another to say that during a drought, endangered species takes priority over 3 million people having access to running water.

Comment ID: 734
Author Name:
Organization:

The Endangered species act needs to be updated. It is one thing to put endangered species ahead of new development. It is quite another to say that during a drought, endangered species takes priority over 3 million people having access to running water.

Comment ID: 744
Author Name: Mark Manning
Organization:

The Endangered species act needs to be updated. It is one thing to put endangered species ahead of new development. It is quite another to say that during a drought, endangered species takes priority over 3 million people having access to running water.

ESA Section 7 responsibilities (Fish and Wildlife)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Resources Threatened and Endangered Species -- The ACF projects affect a large swath of aquatic habitat of fish and wildlife from the Blue Ridge to the Gulf of Mexico, a swath that supports one of the richest aquatic fauna in North America. The Corps is aware of the species and habitats protected under the ESA that are affected by ACF project operations. These species were the focus of our recent consultation for the Woodruff Dam Revised Interim Operating Plan (RIOP). The Corps should address the same ESA-protected resources for the WCM update as for the RIOP: the Gulf sturgeon (Acipenser oxyrinchus desotoi), Fat three ridge (Amblema neislerii), Chipola slabshell (Elliptio chipolaensis), and Purple bankclimber mussel (Elliptoideus sloatianus), all of which have designated critical habitat within the action area. At this time, no species or critical habitats are proposed for protection under the ESA that occur within the action area. Since the WCM update process will span several years, we remind the Corps of the action agency's responsibility under the ESA Section 7 regulations to determine the effects of its proposed action on all listed, proposed, and candidate species and critical habitats that may be present in the action area. The Corps will need to revisit the list of threatened and endangered species periodically during the planning process and must verify the accuracy of its species/habitats list when the agency begins preparing a biological assessment. We encourage the Corps to visit our websites for current species lists and other information: http://www.fws.gov/panamacity/ http://www.fws.gov/athens/ http://www.fws.gov/daphne/

Comment ID: 47
Author Name: Mike Godfrey
Organization:

The Corps' method of developing its Interim Operations Plan ("lOP") and Revised Interim Operations Plan ("RIOP") raises concerns about how the Corps defines its statutory authority with respect to ACF River Basin operations. The lOP and RIOP are almost exclusively driven by fish and wildlife concerns. However, only one ACF reservoir-West Point-was expressly authorized by Congress for any fish and wildlife purpose, and that West Point authorization was for fish and wildlife recreation. There is no recreational purpose associated with the mussel and sturgeon species which were the subject of the lOP and RlOP. The Corps has no independent authority to create an lOP or RIOP designed to benefit threatened and endangered species to the detriment of the authorized purposes of the ACF reservoir system.
The Endangered Species Act ("ESA") does not authorize federal actions independent of federal agencies' other statutory authorities. Rather, a federal agency may undertake an action for the conservation of a threatened or endangered species only if its authorizing statutes allow it to do so. The Eighth Circuit Court of Appeals, in an opinion addressing the Corps' Missouri River operations, noted that if "ESA compliance would force the Corps to abandon the dominant [Flood Control Act] purposes of flood control or downstream navigation, the ESA would not apply." In re Operation of the Missouri River System Litigation, 421 F.3d 618, 631 n.9 (8th Cir. 2005) (emphasis added). The Eighth Circuit's opinion largely upheld a decision by Judge Paul Magnuson, who now presides over the ACF litigation in the Middle District of Florida. Likewise, the Supreme Court has recently held that ESA Section 7 governs only discretionary federal action; it does not mandate any result beyond or contrary to an agency's discretionary authority. Nat 'I Ass 'n of Home Builders v. Defenders of Wildlife, 127 S. Ct. 2518, 2536 (2007). Under the applicable provisions of the ESA and the regulations of the Fish and Wildlife Service, the Corps should have presented its method of operating the ACF reservoirs as the subject of the Section 7 consultation. Because the Corps failed to do so, there was never any determination whether the Corps' pre-lOP operations potentially "jeopardize[d) the continued existence" of the Gulf sturgeon or the Apalachicola mussels or "destroy[ed] or adversely modif[ied)" those species' critical habitats. Rather, the lOP itself was made the subject of Section 7 consultation--even though the Corps lacks independent statutory authority to develop the lOP or RIOP. Support of navigation is among the primary Congressionally authorized purposes of the ACF reservoirs. Accordingly, the Corps has no discretion to abandon navigation support, nor may the Corps operate the ACF reservoirs for conservation of a species listed under the ESA if doing so results in operations which fail to provide for navigation and the other Congressionally

authorized purposes of the ACF reservoirs. See 421 F.3d at 629 n.7 ("[I]f faced in the future with the unhappy choice of abandoning flood control or navigation on the one hand or recreation, fish and wildlife on the other, the priorities established by the [statutes authorizing the Missouri River projects] would forbid the abandonment of flood control or navigation."). Providing additional flows for fish and wildlife are appropriate only after the primary purposes of the ACF reservoir system, including navigation, are met. Thank you for your consideration of these comments. Should you have any questions or if you wish to receive additional information, please contact me at (205) 992-6387 or jgodfrey@southernco.com.

Comment ID: 52
Author Name: V.M. Perry, Jr.
Organization: Lake Lanier Association

We also maintain that the Endangered Species Act (“ESA”) does not require the Corps to augment flows from storage purely for protection of the listed species when basin inflows fall below 5,000 cfs at the Chattahoochee Gage - because nature herself is the cause of the low ACF flows, not the Corps.

During droughts, the Corps is obligated to augment flows using storage in Lanier to realize the ACF facilities’ legally-recognized benefits (including recreation, water supply, and hydropower). But augmentation flows purely to meet the arbitrary 5,000 cfs MRF are not mandated by the ESA.

Humans more important than mussels (Fish and Wildlife)

Comment ID: 14
Author Name: Al Pope
Organization:

Mussels more important than people? I don’t think so. Makes everyone look ridiculous

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Comment ID: 153
Author Name: Debra Nix
Organization:

It is a shame to consider the species in the lower basin in FL as more important than the species of wildlife in the upper river basin and in West Pt. Lake. I have seen years where the bass and bream are spawning and the water level is dropped by the Corps which devastates the new hatchlings in the lake. It is cruel and ridiculous for the Corps to be that irresponsible.

Comment ID: 242
Author Name:
Organization:

Extinction is a natural process and if a drought means that threatened or endangered species might become extinct, then so be it. Put the needs of the HUMANS above the needs of the animals.

Comment ID: 371
Author Name: Jonathon Heard
Organization: City of Cumming

Human life and welfare should be protected and placed before the life of an obscure endangered muscle or fish.

Comment ID: 392
Author Name: Cile Gierhahn
Organization: Lakefront Homeowner

I can't tell from the diagram what role the water from Lake Lanier plays in the Lake Seminole Dam, releasing water to Apalachicola, so it's hard to comment! FL seems to get a heck of a lot more rain than GA does, so why can't they supply their OWN water?

Aren't the shellfish mentioned salt water creatures anyway?!! As for the Research Reserve, what about the research and recreational needs in GA?!!!

Comment ID: 395
Author Name: Cile Gierhahn
Organization: Lakefront Homeowner

I can't believe anyone considers endangered species more important than humans!! Again, let Florida deal with their own water funding requirements!

Comment ID: 399
Author Name: Jane Browder
Organization: lake property owner

Lanier can not survive if it is held hostage by the endangered species act. If Lanier dries up...then what? Millions of Georgians lives need to be considered over a handful of mussels. Florida didn't care about those mussels in the past...just their oyster industry and this has been their ticket to protect that business.

Comment ID: 422
Author Name: Jerry Collins
Organization:

The headwaters of Lanier originate in North Georgia and I feel belongs to Georgia. I feel the amount of water discharged should only be for the benefit of people not mussels or other species of fish/fowl/clams etc.

Comment ID: 427
Author Name: Mark Condon
Organization:

Also, while I understand the need to protect wildlife and endangered species, I feel putting the welfare of mussels ahead of the 5 million plus residents of North Georgia is dangerous, particularly since no one has an understanding of how much fresh water is necessary to sustain these mollusks. The agency responsible for the demand should demonstrate evidence of the need before decisions are made to keep flows at a higher than normal rate.

Comment ID: 429
Author Name: George searing
Organization:

2. It is ridiculous to lower Lanier in order to protect whatever in the state of Florida.

Comment ID: 441
Author Name: Miller Stevens
Organization:

I have lived on Lake Lanier for many years inside the city across from park and it is NOT acceptable to take our water just for some small thing called a mussel.

Comment ID: 466
Author Name: Kenneth Davis
Organization:

1. Regarding "endangered species" - can the sturgeon and mussel not be cloned?

Comment ID: 481
Author Name:
Organization:

3) People always come first. Stop releasing water downstream for mussels, etc

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Comment ID: 485

Author Name: George Ehrhardt
Organization:

To have it used by the states of Florida and Alabama to protect a mussel (that no one really cares about) at the expense of depleting Lake Lanier is ludicrous at best. And that Act does contain a provision that allows a species to become extinct if a section of the human population is, or may become, threatened by its survival. Keeping this mussel, or any other endangered species in the Apalachicola River, alive by the use of millions of gallons of water each day will surely bring extreme hardship to North Georgia in the future.

Comment ID: 505
Author Name: John and Jodi Wacho
Organization:

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.

Comment ID: 523
Author Name: Jack Griffeth
Organization:

The drought effect is compounded by the continued release of water through Buford Dam to sustain mussels downstream.

Comment ID: 538
Author Name: George N. Slappey, DDS
Organization:

The native species of wildlife in the downstream rivers should take a back seat to the needs of mankind!

Comment ID: 667
Author Name:
Organization: lake Lanier association

HUMAN LIFE BEFORE ENDANGERED SPECIES!

Comment ID: 680
Author Name: John Tierney
Organization:

- Please incorporate legal language in the management plan to ensure that legal maneuvering does not consume valuable time and resources for ploys such as saving mussels in the Apalachicola River at the expense of farmers and cities that require water for nondiscretionary needs.

Lake Lanier vs. Mussels (Fish and Wildlife)

Comment ID: 8
Author Name: Tiffany Stone
Organization: Lake Lanier Resident

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

Comment ID: 11
Author Name: Tom & Patti Montijo

Organization:

Consider how the mussels and other endangered species survived before Lake Lanier was made and whether or not they can, indeed survive without human intervention.

Comment ID: 17
Author Name: Marguerite Daniel
Organization: Athens Boat Club, Inc.

2. We strongly feel that Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola River. This was not in the original policy.

Comment ID: 40
Author Name: Paul M. Flood
Organization:

4. No official written documentation exists that targets Lake Lanier as a source of water for the protection of mussels and other endangered species in the ACF; therefore, do not even consider drawing Lake Lanier down for this purpose.

Comment ID: 42
Author Name: Tom Oliver
Organization: Hall County Government Board of Commissioners

2. Lake Lanier should not be drawn down for the protection of rare mussels or other endangered species in the Apalachicola River; it is disingenuous of those promoting this rationale for drawing down lake levels in Georgia to hide behind the Endangered Species Act. A single dry season is highly unlikely to wipe out species which have survived many hundreds of thousands of years without the benefit of flood control dams along the Apalachicola, Chattahoochee and Flint River Basins. It leads one to believe that the real issue is the economic value of the Florida oyster harvest;

Comment ID: 65
Author Name: Vicky Ginn
Organization:

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

Comment ID: 79
Author Name: James Griffin
Organization:

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

Comment ID: 80
Author Name: Greg and Mary Drummer
Organization:

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

Comment ID: 245
Author Name: Randy Nix
Organization:

In extreme drought, why not let the flow of the river determine flows into Apalachicola Bay? The mussels and sturgeon survived many droughts before the lakes-they can do it again. Draining Lake Lanier as a short term fix for endangered species will possibly take years to refill, whereas the mussels and sturgeon would have been just fine on run of the river as they were for thousands of years before the dams.

Comment ID: 327

Author Name: Thomas Clark
Organization:

For millions of years the mussels and fish have survived during drought times without reservoir storage upstream. Why now destroy a lake to save them when they will survive without it.

Comment ID: 399
Author Name: Jane Browder
Organization: lake property owner

Lanier can not survive if it is held hostage by the endangered species act. If Lanier dries up...then what? Millions of Georgians lives need to be considered over a handful of mussels. Florida didn't care about those mussels in the past...just their oyster industry and this has been their ticket to protect that business.

Comment ID: 413
Author Name: Perry Darsey
Organization:

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

Comment ID: 414
Author Name: Pat Darsey
Organization:

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

Comment ID: 416
Author Name: Robert Busser
Organization:

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

Comment ID: 417
Author Name: Mary Thompson
Organization: Mary Thompson Appraisals

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

Comment ID: 418
Author Name: Mary Thompson
Organization: Mary Thompson Appraisals

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

Comment ID: 420
Author Name: Allen Gresham
Organization:

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

Comment ID: 421
Author Name: Pat Darsey
Organization:

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

Comment ID: 450
Author Name: Sidell Tilghman
Organization:

I am for the environment but the bank climber and his associate mussel as well as the sturgeon have been in the river system in Florida for a long, long time- well before Lake Lanier was built and the water flow was less than it is now. I am not proposing the elimination of these species or their detriment but the concern over the cfs rate is way more than these animals actually need.

Comment ID: 452
Author Name: James & Shannon Lince
Organization:

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

Comment ID: 460
Author Name: Peter Collins
Organization:

*Lake Lanier should not be drawn down for mussels or other species - what happened before there was a dam in a drought?

Comment ID: 472
Author Name: Mary Kirves
Organization: Lake Property Owner

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

Comment ID: 474
Author Name: Mandy C. Harris
Organization:

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

Comment ID: 475
Author Name: Richard N. Harris
Organization:

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

Comment ID: 476
Author Name: Heather Jones
Organization:

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

Comment ID: 477
Author Name: Crow Hunter
Organization:

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

Comment ID: 478
Author Name: Matt Johnston
Organization:

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

Comment ID: 479
Author Name: Stephanie Nakamura
Organization:

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

Comment ID: 486
Author Name: Jim & Judy Foster
Organization:

Lake Lanier should never be drawn down to a resource limiting and economy damaging level to protect mussels and other endangered species in the Apalachicola River!

Comment ID: 487
Author Name: Melvyn & Gail Smith
Organization:

4-Discontinue drawing down Lake Lanier for mussels and other endangered species in the Apalachicola River.

Comment ID: 506
Author Name: Marilyn Haight
Organization:

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.

Comment ID: 507
Author Name: Trace Erge
Organization:

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

Comment ID: 508
Author Name: Robert Tate
Organization:

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

Comment ID: 510
Author Name: Michael Muenchen
Organization:

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

Comment ID: 511
Author Name: John Muenchen
Organization:

2. Lake Lanier should not be drawn down for mussels and other endangered species in the

Apalachicola River;

Comment ID: 517
Author Name: Scott Carper
Organization:

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.

Comment ID: 518
Author Name: Raymond Smith
Organization:

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

Comment ID: 519
Author Name: Brad Jordan
Organization:

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.

Comment ID: 521
Author Name: John O’Donnell
Organization:

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

Comment ID: 522
Author Name: Tim Muenchen
Organization:

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

Comment ID: 523
Author Name: Jack Griffeth
Organization:

The drought effect is compounded by the continued release of water through Buford Dam to sustain mussels downstream.

Comment ID: 524
Author Name: Palmer
Organization:

-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

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Comment ID: 525
Author Name: Walt Banasik
Organization:

2. No draw down for mussels or other species in the Apalachicola river

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Comment ID: 528
Author Name:
Organization: Resident

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

Comment ID: 529
Author Name: Tim Altman
Organization: Timberidge on Lanier Condominium Association

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

Comment ID: 533
Author Name: Jeanne Beachler
Organization:

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

Comment ID: 534
Author Name: Ebby Hamby
Organization:

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

Comment ID: 535
Author Name: Stacy Wade
Organization: LLA

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

Comment ID: 536
Author Name: Ellen Whitaker
Organization:

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

Comment ID: 537
Author Name: Charles Mann
Organization:

2-I don't believe that one of the purposes of the lake was to support Mussels.

Comment ID: 539
Author Name: Ken Fields
Organization:

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

Comment ID: 540
Author Name: Charlie Nugent
Organization:

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

Comment ID: 544
Author Name: Raymond F. Egan
Organization:

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

Comment ID: 551
Author Name:
Organization:

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

Comment ID: 552
Author Name: Leo and Marie Anne Van de Vall
Organization:

-please, don't drawn down Lake Lanier for mussels and other endangered species in the Apalachicola River;

Comment ID: 556
Author Name: Guy Caldwell
Organization: Possible NOW

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

Comment ID: 557
Author Name: Terry Donnenwirth
Organization:

Lake Lanier should not be drawn down for endangered species in the Apalachicola River.

Comment ID: 559
Author Name: Roy Beavers
Organization:

The lake should not be drawn down for mussels and other endangered species in the Apalachicola River.

Comment ID: 560
Author Name:
Organization: Windsong Sailing Academy

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

Comment ID: 561
Author Name: Jay Martin
Organization:

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

Comment ID: 562
Author Name:
Organization:

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

Comment ID: 564
Author Name: S.M. Chassner

Organization:

-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?

Comment ID: 595
Author Name: Susan Banasik
Organization:

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

Comment ID: 596
Author Name: Dale Smart
Organization:

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

Comment ID: 599
Author Name: Don Turner
Organization:

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

Comment ID: 601
Author Name: James Inglis
Organization: none

2. Lake Lanier should not be drawn down for mussels and other endangered species in the Apalachicola river

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Comment ID: 604
Author Name: FRED ROBBE
Organization:

Lake Lanier's priority should not be protecting mussels and endangered species in the Apalachicola River.

Comment ID: 610
Author Name: Marvin Fisher
Organization:

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

Comment ID: 611
Author Name: Bob Kaufman
Organization: Harbour Point Dock Chairman

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

Comment ID: 612
Author Name:
Organization:

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

Comment ID: 615
Author Name: Judy Humphreys
Organization:

and during drought do not drain LL for animals in Fla.

Comment ID: 617
Author Name: Robert Skrypek
Organization: Lake Lanier area resident

let Florida provide the necessary water from there sources for the mussels

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Comment ID: 618
Author Name: Barry Smith
Organization:

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

Comment ID: 626
Author Name: Carl & Rae-Lynne Swigart
Organization:

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

Comment ID: 627
Author Name: Chad Hargett
Organization:

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

Comment ID: 629
Author Name: Brantley Burns
Organization:

2.Water from Lake Lanier should not be used to protects mussels and other endangered species.

Comment ID: 632
Author Name: Tony
Organization:

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

Comment ID: 648
Author Name: Trey
Organization: Wakeboarder

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

Comment ID: 649
Author Name: Trey
Organization: Wakeboarder

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

Comment ID: 651
Author Name: Bert Sykes
Organization:

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

Apalachicola River;

Comment ID: 653
Author Name: Bruce Margol
Organization:

Lake Lanier should not be drown down fro mussels or other endangered species in the Apalachicola river.

Comment ID: 672
Author Name: David Volpe
Organization:

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

Comment ID: 673
Author Name: Masry Jean Volpe
Organization:

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

Comment ID: 674
Author Name: Michael Volpe
Organization:

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

Comment ID: 675
Author Name: Jennifer Volpe
Organization:

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

Comment ID: 676
Author Name: Evelyn Volpe
Organization:

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

Comment ID: 684
Author Name: MICHAEL MC-KEITHEN
Organization:

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

Comment ID: 688
Author Name: arnold hall
Organization: none

then on the other side I see some mussels that someone wants to keep alive and I see that some person could choose these worthless mussels over all the things on the other side. but lets remember, politics is deeply involved here between 3 governors who does not care about anything but winning the grudge war and the sad part is the partiality I feel is being shown here is having the person that is in complete control of opening the gates at the dam is living and stationed in Alabama. this should never be because all people feel he will look after his state no matter what, THIS IS WRONG, WRONG, WRONG. so Alabama and Florida will choose worthless stinking mussels over people’s lives. so do what you will do and save the mussels

and to hell with everything and everyone else involved

Comment ID: 693
Author Name: James & Teresa Coryell
Organization:

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

Comment ID: 701
Author Name: Richard P. Sandoz
Organization: Property Owner

Please do not release any more than the absolute minimum amounts of water for downstream wildlife i.e. mussels and none at all during times of drought.

Comment ID: 703
Author Name: Allen DuPont
Organization:

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

Comment ID: 704
Author Name: Allen DuPont
Organization:

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

Comment ID: 706
Author Name:
Organization:

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

Comment ID: 711
Author Name:
Organization: Self

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

Comment ID: 712
Author Name:
Organization:

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

Comment ID: 713
Author Name: Bob McLeod
Organization:

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

Comment ID: 725
Author Name:
Organization:

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

Comment ID: 731
Author Name: Phil Sutton
Organization: Hall County Board of Commissioners

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

Scientific Evidence-Mussels' Flow Needs (Fish and Wildlife)

Comment ID: 53
Author Name: Ron Seder
Organization:

Apalachicola River flows are said to be needed for power plants, endangered/threatened species survival/spawning, and a healthy oyster/Gulf fisheries industry. We have yet to see the scientific and justified economic facts behind these claims, and punishing millions of people by taking their water because of the declaration of a few threatened/endangered species in the Apalachicola River is just plain wrong.

Comment ID: 318
Author Name: Kim Sak
Organization:

The next thing that I'd like to point out is, I'd like to see, as soon as possible, an environmental impact study done on the endangered species of mussels downstream to determine how much water they need during drought conditions to survive.

Comment ID: 670
Author Name: Laurie Hageman
Organization:

I'm concerned with the 5000cfs releases during droughts. Where did the number come from and why wouldn't drought conditions and dangerously low levels of the lake change this number?

Comment ID: 804
Author Name:
Organization:

Also I question the about of water released for the mussels and other endangered species. When it is not determined how much water needs for them to survive.
What did they do when drought conditions occurred before Lake Lanier was formed. They survived.

Comment ID: 816
Author Name: Tim Perkins
Organization: Forsyth County

A 5,000 cfs minimum flow from the Jim Woodruff Dam to the Apalachicola River in support of water quality and water supply has not been proven to be necessary. It seems that this number far exceeds the natural low flow numbers.

No Mandatory Minimum Flows (Fish and Wildlife)

Comment ID: 541
Author Name: Donald C Pauley
Organization:

2. Water should not be released solely to support fresh water muscles or other so called endangered species downstream.

Comment ID: 785
Author Name: David Vaughan
Organization:

Eliminate the mandatory requirement for 5000 cfs at Woodruff Dam. This results in drawing down upstream lakes, especially Lanier, even when it is not needed. The same may apply to the 750 cfs required flow at Peachtree Creek. Any other arbitrary requirements should also be eliminated as well.

Endangered Species Can Survive Without Special Releases (Fish and Wildlife)

Comment ID: 16
Author Name: William D. Rezak
Organization:

The river flow would be too low to save these creatures if there had not been a lake constructed in the first place.

Comment ID: 18
Author Name: Jack Berznott
Organization:

I'd like to inject some common sense concerning the need of endangered species. Certainly these species have survived long enough before the reservoir system was in place to guarantee a constant flow. Droughts and floods were probably part of their environment. The same goes for the oyster beds, and they too survived. So I can't see that this should be a factor for consideration.

Comment ID: 109
Author Name: Sylvia and Wayne Hunter
Organization:

Apparently the lake management has fallen for endangered species myths spread by Florida’s shrimp and oyster lobbies. The facts are obvious that for 16 million years the Lord has provided ample water for the so-called endangered species, mussels and sturgeons, without the help of water managers.

Comment ID: 152
Author Name: Bob Kustermann
Organization:

Apalachicola Bay is large enough and should not be dependent on water from Georgia for their fisheries industry.

Comment ID: 372
Author Name: Nancy Niekro
Organization:

Another problem is the release for endangered species downstream. How did they survive before the lake existed? They managed to survive during floods and droughts, seems that they would continue to survive with a little less water being released.

Comment ID: 385
Author Name: Kent Bennett
Organization:

The wildlife in the Apalachicola Bay survived long before the Corp impounded the West Point Lake. There are reports that the river completely dried up in LaGrange within the last 100 years. All of the oysters, Sturgeon, etc. survived. Why should your control plan make any special arrangements for this?

Comment ID: 394

Author Name: Robert Kopp
Organization:

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

Comment ID: 466
Author Name: Kenneth Davis
Organization:

2. How did these species survive a drought before Lake Lanier was formed?

Comment ID: 505
Author Name: John and Jodi Wacho
Organization:

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.

Comment ID: 527
Author Name: Terry Simpson
Organization:

elimination of releases for endangered mussels in Apalachicola bay,

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Comment ID: 549
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: 566
Author Name: Tom Riggle
Organization:

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.

Comment ID: 633
Author Name: David Vogelpohl
Organization:

Water should not be released specifically to support endangered species. These species have shown remarkable signs of adaptation before the lake was in place and should be able to do so now. Let nature take its course.

Comment ID: 665
Author Name: Jan Hageman
Organization: Resident

IS too much consideration given to endanger species. Some of these are not indigenous to the ACF and mother nature would have let them go extinct years ago. Meanwhile, being a resident of Lake Lanier, I see many clams that don't make it and small fish and so-called sport fish

having to move their homes daily as the shoreline changes from depleting water. Why are the weaker species' lives more important than the stronger ones. If you are going to muck-around with mother nature by putting in dams, please don't second guess her policy of survival of the strong. Give the lakes of the upper ACF a chance life too.

Develop Alternatives to RIOP (Fish and Wildlife)

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

The comments provided below are submitted for the protection and enhancement of aquatic wildlife resources for the people of Alabama. The public has a vested interest in natural resource management because they are the ones for whom natural resources are held in trust. Project Releases Presently, Buford Dam has an instantaneous minimum flow requirement of 750 cfs. The flow for Buford Dam is measured at Peach Creek approximately 30 miles below the dam. West Point Dam has an instantaneous minimum flow requirement of 675 cfs. Both of these values were based on flow requirements needed to meet water quality standards. Jim Woodruff Dam has an average daily minimum flow requirement of 5000 cfs, based on historic low flow data and the requirements of downstream industries. Walter F. George and George W. Andrews dams do not have minimum flow requirements in place at this time. Many studies have shown that inadequate minimum flows are a barrier to maintaining healthy riverine fish, mussel, snail and crayfish populations. Pulses of water flows without continuous flows during non-generation periods exacerbate impacts to aquatic wildlife. The goal of the COE should be to ensure that sufficient quality and quantity of water is provided in such a manner as to resemble the natural riverine flow regime. This flow regime shall provide aquatic habitat conditions that support a diversity of endemic aquatic species (including fish, plants, mussels and other invertebrates) and their life cycle requirements. As a function of the natural flow regime, both intra- and inter-annual variations of flows shall be implemented to sustain biological diversity and a balanced community of organisms.

Comment ID: 274
Author Name: Michael Halicki
Organization:

Second, there is the need to study alternatives to the RIOP. To use this waste this opportunity by merely documenting existing operations is a waste of taxpayer money towards an end that makes little sense and will cost a lot of money. If you don't have the money to do what you should do, it still doesn't make it right to squander the resources you have on a process that fails to engage on the important issues facing the basin. This is not the time for timidity. This is the time for leadership.

Comment ID: 570
Author Name: Bradley Curry, Jr.
Organization:

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.

RIOP is Flawed (Fish and Wildlife)

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

Events leading to the development of the Interim Operations Plan ("lOP") and Revised Interim Operations Plan ("RIOP") illustrate our concerns. Like TRWDA, in our view, the Corps never clearly defined the action which was the subject of a consultation with the U.S. Fish and Wildlife Service ("FWS") under the Endangered Species Act ("ESA"). Under ESA Section 7(a) (2), federal agencies are required to consult with FWS to insure a proposed action does not (1) jeopardize the continued existence of a listed species or (2) destroy or adversely modify

designated critical habitat. 16 U.S.C. § 1536(a) (2). If the action would cause jeopardy or adverse critical habitat modification, FWS is authorized to propose reasonable and prudent alternatives and reasonable and prudent measures. However, in this case, the federal action constituting the basis for consultation was never clearly defined. Rather than presenting to FWS its standard operating procedures under the authorizing statutes, the Corps entered into open-¬ended negotiations with FWS and developed what amounts to a freestanding conservation agreement for the Apalachicola River only. The resulting RIOP now inappropriately drives operations for the rest of the system

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Comment ID: 67
Author Name: Jeff Lukken
Organization: Mayor of LaGrange

The Interim Operating Plan (IOP) and the Revised Interim Operating Plan (RlOP) are inherently flawed with regards to their influence on West Point Lake. Major changes in operations were made throughout 2006, 2007, and into 2008 without adequate study or understanding of the impacts of IOP and RlOP operations on West Point Lake. No "in depth" study has been made of the presence of, or the impact on, endangered species or any other fish and wildlife that may exist in the lake or in tributaries in West Point Lake that may be affected by rapid lake level fluctuations. Stakeholders in the area have observed massive kills of native mussels in the project boundaries when the Corps operates the dam to provide massive rapid draw downs for downstream flows. No studies of the impacts to flora and fauna have been completed to adequately assess these issues damages resulting from operations and lake fluctuations.

Comment ID: 69
Author Name: Jeff Brown
Organization: Troup County Chamber of Commerce

The Interim Operating Plan (lOP) and the Revised Interim Operating Plan (RIOP) are inherently flawed with regards to their influence on West Point Lake. Major changes in operations were made throughout 2006, 2007 and into 2008 without adequate study or understanding of the impacts of lOP and RIOP operations on West Point Lake. No "in depth" study has been made of the presence of, or the impact on, endangered species or any other fish and wildlife that may exist in the lake or in the tributaries in West Point Lake that may be affected by rapid lake level fluctuations. Stakeholders in the area have observed massive kills of native mussels in the project boundaries when the Corps operates the dam to provide massive rapid draw downs for downstream flows. No studies of the impacts to flora and fauna have been completed to adequately assess these issue damages resulting from operations and lake fluctuations.

FLOW CONCERNS FOR APALACHICOLA BAY

Salt Water Intrusion (Biological Resources)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Apalachicola Bay Habitats and Fisheries – The biological organization of Apalachicola Bay is controlled largely by riverine influences on its salinity, turbidity, and sedimentation rates (Livingston 1991). We encourage the Corps to apply a spatially-explicit hydrodynamic model of the bay to assess the effects of alternative operations on salinity regimes, and in turn, on the relative distribution of salt marshes, submerged grass beds, and oyster bars in the bay.

Comment ID: 57
Author Name: Chadwick Taylor
Organization:

Dear Col. Jorns: By this email and according to your instructions I submit these comments for the record on the Environmental Impact Assessment of the Proposed Update to the ACF Water

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Control Manual. Please by return email indicate you have received this in a timely manner. First, I want to endorse and I support the comments submitted by both the Apalachicola Riparian County Stakeholder Coalition and the Apalachicola Riverkeeper, as if they are my own and were attached herewith. As a faithful servant of both organizations and others such as River Way South, I believe their submissions to this process to be better than anything I can write on my own. Having said that, and in watching daily, and to paraphrase David C. Korten in his book, we are in The Great Turning, From Empire to Earth Community, and the United States is in deep trouble. At present we seem destined to try to solve our troubles by the very same means by which we arrived in this fix. The lessons learned but not acted upon are encompassed in the referenced comments above from these two distinguished organizations and General Schroedel has taken to saying it himself, "the ACF system is already over-allocated". Since being raised on the St Johns River I have watched the decline of that system from bulkeds, dredging, over-allocation and saltwater intrusion to where the cypress trees that line the banks are now dead and dying and the river turns green in the summer. If left unchecked we seem destined to the same fate here on the Apalachicola River and Bay for many of the same reasons and more. We are up against what I will call, the ecological imperative, and denial is not another river in Egypt. Actions proposed and already implemented by the USACE sanctioned by the USFWS, the State of Georgia and others simply will destroy the Apalachicola River and Bay in time, a death by a thousand slashes. But such a fate is entirely unnecessary as I like to remind us, we can forgive our ancestors for they knew not what they were doing but in our time we know
exactly what we are doing and our children's children and theirs' are least likely to forgive us. As the lead player in this game the USACE can do the right thing and avoid the judgment of our descendents. I am not confident that you can for I understand you can lead the horse to water but you can't make him drink. At that you have the necessary information before you in the above comments and we will work with you to the best possible outcome. Simply put we must establish and protect the ecological and historical flow regime first and the rest is up for debate. I commend for your further consideration, The Dominant Animal, Human Evolution and the Environment by Paul Ehrlich, that describes well where we have come from, the challenges we face, and most importantly acknowledges limits most will find an inconvenient truth. In the Apalachicola River and Bay and the ACF Basin we find an opportunity and a challenge to lead our
nation. I have enjoyed our collaboration together and am hopeful for a successful outcome that protects the Apalachicola River and Bay Basin and the communities within. For if we do that, we will succeed in protecting the entire ACF basin. I trust you will do your best and I remain ready and willing to provide further assistance. Please don't hesitate to call. Sincerely yours, Chad Taylor C. Chadwick Taylor CCT & Associates, Inc. P. O. Box 315, 4209 Buckland Trail Greenwood, Florida 32443 850/526-0176, cct@phonl.com

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Comment ID: 87
Author Name: Charles Chapman
Organization:

Point in case, bull sharks were recently seen and documented near the Jim Woodruff Dam. Understanding this is not uncommon for bull sharks in the genetic makeup, however, this is discussion worthy.

Comment ID: 376
Author Name: Jonathon Heard
Organization: City of Cumming

The Apalachicola Bay region should be scrutinized to determine what human activity has caused more saline intrusion into the Bay. The saline intrusion into the bay could be prevented by restoring the coast line to it's natural state. Dredging and shipping interests have created more avenues for the saline water to enter the Bay.

Comment ID: 515
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 dramatically over the past 2 years.

Comment ID: 700
Author Name: Mary Ann Durrer
Organization:

During the last year, since the water flow has been reduced so drastically in the Apalachicola River we have seen a number of adverse effects. Salt water predators have moved into our bay, since it is so much more salty with the reduced fresh water flow, and are devouring the oysters. I have heard that we now have sharks all of the way up the river to the dam. This was unheard of before. Tupelo honey grows in the swamps up river and the trees are dying now because they do not have enough fresh water to survive. Our whole way of life down here is being destroyed. We are facing the death of the most productive bay on the east coast.

Effects of Flow (Biological Resources)

Comment ID: 2
Author Name:
Organization:

My family and I enjoy outdoor and recreational activities on many parts of the Chattahoochee and Flint Rivers, not just near our home. Our chief concern at present is maintaining and preserving the Flint in its present
natural"" state to the greatest extent possible. I don't favor further damming of the Flint if it can be avoided.

Comment ID: 6
Author Name: Heinz J. Mueller
Organization: EPA

The EIS should include a discussion on major biological characteristics to include potential alterations to fluvial aquatic species (species that require flow in their habitat for cover, food, reproduction strategies, and, or rearing of young). The evaluation of the various alternatives should describe their impact on sustainability of the aquatic environment and related human benefits.

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

: ADCNR recommends that the COE review existing data and conducts monitoring studies to determine the present state of aquatic wildlife in river reaches below projects. Using an adaptive process, the COE should evaluate various modeled flows for COE projects to mimic a natural flow regime throughout the ACF. The biological response produced by the environmental flows would be evaluated, and if deemed necessary, adjusted to meet the objective of maintaining ecological integrity.

Comment ID: 52
Author Name: V.M. Perry, Jr.
Organization: Lake Lanier Association

Maintenance of a Navigation Channel as a Corps Operation We request that navigation be abandoned as a function of the Corps' ACF operations. The Corps' studies have shown that dredging to maintain the required 9-foot channel is not only extremely impractical and costly but directly detrimental to the threatened and endangered species in the Apalachicola River and its environs. The result is a damaged river system that puts additional pressure on upstream resources such as Lake Lanier to compensate for the deteriorating riverbed and deleterious effects on habitat. The state of Florida has refused for a number of years to grant a permit to the Corps for depositing dredged material. Modern-day transportation has reduced the use of the ACF for that purpose to a trickle. Maintaining a navigation channel is an anachronism that should be eliminated from the Corps' operations of the ACF.

Comment ID: 57
Author Name: Chadwick Taylor
Organization:

Dear Col. Jorns: By this email and according to your instructions I submit these comments for the record on the Environmental Impact Assessment of the Proposed Update to the ACF Water Control Manual. Please by return email indicate you have received this in a timely manner. First, I want to endorse and I support the comments submitted by both the Apalachicola Riparian County Stakeholder Coalition and the Apalachicola Riverkeeper, as if they are my own and were attached herewith. As a faithful servant of both organizations and others such as River Way South, I believe their submissions to this process to be better than anything I can write on my own. Having said that, and in watching daily, and to paraphrase David C. Korten in his book, we are in The Great Turning, From Empire to Earth Community, and the United States is in deep trouble. At present we seem destined to try to solve our troubles by the very same means by which we arrived in this fix. The lessons learned but not acted upon are encompassed in the referenced comments above from these two distinguished organizations and General Schroedel has taken to saying it himself, "the ACF system is already over-allocated". Since being raised on the St Johns River I have watched the decline of that system from bulkeds, dredging, over-allocation and saltwater intrusion to where the cypress trees that line the banks are now dead and dying and the river turns green in the summer. If left unchecked we seem destined to the same fate here on the Apalachicola River and Bay for many of the same reasons and more. We are up against what I will call, the ecological imperative, and denial is not another river in Egypt. Actions proposed and already implemented by the USACE sanctioned by the USFWS, the State of Georgia and others simply will destroy the Apalachicola River and Bay in time, a death by a thousand slashes. But such a fate is entirely unnecessary as I like to remind us, we can forgive our ancestors for they knew not what they were doing but in our time we know
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Comment ID: 58
Author Name: Caroline Weiler
Organization:

Secondly, I am hoping that the Corp will make new rules that will keep the water flowing downstream so that this magnificent spot on the planet will survive and thrive for the world to experience for future generations. This kind of living museum is disappearing.

Comment ID: 67
Author Name: Jeff Lukken
Organization: Mayor of LaGrange

The Interim Operating Plan (IOP) and the Revised Interim Operating Plan (RIOP)
are inherently flawed with regards to their influence on West Point Lake. Major changes in operations were made throughout 2006, 2007, and into 2008 without
adequate study or understanding of the impacts of IOP and RIOP operations on West Point Lake. No "in depth" study has been made of the presence of, or the
impact on, endangered species or any other fish and wildlife that may exist in the lake or in tributaries in West Point Lake that may be affected by rapid lake
level fluctuations. Stakeholders in the area have observed massive kills of native mussels in the project boundaries when the Corps operates the dam to provide
massive rapid draw downs for downstream flows. No studies of the impacts to flora and fauna

have been completed to adequately assess these issues damages resulting from operations and lake fluctuations.

The use of West Point Lake to support downstream navigation should not be considered in any alternative in operation plans without adequate study of the ecological and other environmental damages caused by tile likely lake fluctuations to support that activity. Water Quality will likely be impacted under such use that results in rapid lake elevation fluctuation .In addition the damage to the recreational use, and sport fishing and wildlife component of the lake must be assessed before giving any consideration of such alternative operations. Heretofore such operations were made whenever water was thought to be adequate, without any consideration of environmental or economic damages at WestPoint.

Comment ID: 69
Author Name: Jeff Brown
Organization: Troup County Chamber of Commerce

The Interim Operating Plan (lOP) and the Revised Interim Operating Plan (RIOP) are inherently flawed with regards to their influence on West Point Lake. Major changes in operations were made throughout 2006, 2007 and into 2008 without adequate study or understanding of the impacts of lOP and RIOP operations on West Point Lake. No "in depth" study has been made of the presence of, or the impact on, endangered species or any other fish and wildlife that may exist in the lake or in the tributaries in West Point Lake that may be affected by rapid lake level fluctuations. Stakeholders in the area have observed massive kills of native mussels in the project boundaries when the Corps operates the dam to provide massive rapid draw downs for downstream flows. No studies of the impacts to flora and fauna have been completed to adequately assess these issue damages resulting from operations and lake fluctuations.

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Comment ID: 71
Author Name: Steven J. Herrington
Organization: The Nature Conservancy

Develop a scientific consensus of environmental flow needs of the ACF
The goal of this EIS is to determine the environmental impacts of U.S. Army Corps of Engineers (USACE) operations in the ACF River Basin. Although there has been a tremendous amount of publically available ecological data collected over the past several decades in the system, there is still not a scientific consensus on the physical and biological effects of operations in the ACF River Basin, particularly in the Apalachicola River and Bay.

Comment ID: 76
Author Name: Allen Boyd
Organization: U.S. Congress

Chronic drought conditions in the southeastern U.S. have led to dramatic decreases in the quantity of water entering the ACF system. Both these natural fluctuations in water supply and human-related uses have led to unprecedented reductions in freshwater inflow entering Apalachicola Bay. The water and nutrients that the Apalachicola River delivers to the bay are critical to the health and productivity of the estuary and adjacent coastal waters of the Gulf of Mexico. This area supports significant recreational and commercial fisheries, including oysters

(90 percent of Florida's fishery), shrimp, grouper, and other high-value species. As such, the baseline for scoping should include an analysis of all impacts not only to the Apalachicola River, but to the Apalachicola Bay ecosystem that depends on the fresh water flows from the river.

Comment ID: 311
Author Name: Stephen Scanlan
Organization:

The estuary at risk was made by God and the man made dams interrupting its life sustaining flow cannot be allowed.

Comment ID: 489
Author Name: John Mock
Organization:

From my point of vision in this issue I sometimes wonder why reason does not take hold and politics put aside. As an example, the Corp of Engineers has a better view of Lake Lanier from their offices at Buford Dam then I do from my house and I knew a month before they did that they were dumping water out of the lake when they had their faulty "water level gauge" problem last year. And, how come it is OK to kill tens of millions of :fresh water mussels around the shorelines of Lake Lanier by dropping the water level yet the Corp is reluctant to drop the flow of water in the Apalachicola River below 5000 cfs because "5000 cfs is lowest rate they have ever allowed in the river", even though there is no evidence that the river could not reasonably sustain itself at a lower rate of flow. Since this rate has never gone below 5000 cfs I would find it hard to believe there is any relationship to oysters. When the Corp dredges the mouths of the 28 tributaries that feed the Apalachicola River they research each of the tributaries mouths for endangered muscles and when found they relocate the muscles to another part of the river. In the 2002 study only 3 of the 28 mouths of the tributaries had the endangered muscles. So, if it is ok to move muscles for dredging purposes why not move them to accommodate a reduced rate in the flow of the river?

Comment ID: 505
Author Name: John and Jodi Wacho
Organization:

here 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.

Comment ID: 514
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.

Comment ID: 599
Author Name: Don Turner
Organization:

I ask you if Buford Dam and other downstream dams did not exist and a drought occurred - what would the mussels do?

Comment ID: 629
Author Name: Brantley Burns
Organization:

If the lake were not here, the flow in the Apalachicola river would have been far lower. How did those species survive before the lake was built?

Low Flows Harmful to Apalachicola River and Bay (Fish and Wildlife)

Comment ID: 13
Author Name: Noah Lockley
Organization: Franklin County Board of County Commissioners

The Franklin County Board of County Commissioners represents the residents of Franklin County. The Board, in representing its constituents, has an inherent interest in the welfare of the lower River and Bay. The Board believes that the Water Control Manual (WCM) for the ACF system is fundamentally flawed because it will not adequately take into account the freshwater needs of the Bay.

Comment ID: 29
Author Name: Van Lewis
Organization:

My name is Van Lewis. I live at 4434 St. Teresa Avenue in Eastern Franklin County. My mailing address is P.O. Box 323, Panacea, 32346. I'm a resident of Franklin County and voter here, and I would like to give a statement about the water situation in the Apalachicola River. I want to complain in particular about the governor of Georgia saying that what is at issue down here is some rare species of freshwater muscle. I don't know if the governor of Georgia has ever heard of oysters or crabs or mullet or trout or redfish or snapper or grouper or clams, but he is either extremely ignorant making a statement like that or he is lying and misrepresenting the truth about the entire ecosystem down here that is dependent upon normal freshwater flows increasing and decreasing flows, floods and slow of flows. We need not just a constant supply of water, but a variable supply of water for this ecosystem to work. It's a very important ecosystem, and the governor of Georgia did a great disservice to himself and to the people of our country by saying that all we needed water for was a rare species of muscles. I am very angry about it.

Comment ID: 30
Author Name: Joseph Parrish
Organization:

My name is Joseph Parrish, Franklin County Commissioner. I would like to enter some comments in this scoping process. I would like to see a true assessment, environmental impact statement and an assessment done of the Apalachicola Bay and the detrimental effects that the low flows have caused during the years 2006-2007. There are statistical data available through the Florida Fish and Wildlife Service that shows the reduced landings of the crab, shrimp, oysters, pinfish, all of these things, and it's very well documented as to how the low flows have impacted the Apalachicola Bay, but I do not think that they are being taken into consideration. I would like that done during your time, during your Environmental Impact Statement, and your water control plans.

Another issue that they really need to look at is the flows that we need down the Apalachicola River at key times of the year. Just as your flowers bloom in March, so do our fish spawn. We must have our flood plain inundated and flooded in the months of January and February so that we have a good spring spawning season in the month of March, which is very key to our success here in our local economy. It's also very key to the successful season that we have in our estuary in maintaining our fisheries and our habitat for those fish. Another key time for the flood that we need and inundation of the flood plain is in July. Those are two key times, in January and also in July for the oyster spat, which is a microorganism that creates new oysters here in Apalachicola Bay. Those oysters are the key to our water quality. They are a natural filter feeder. They filter out the contaminants coming down the river from other points coming into our bay, and without those oysters, we lose our water quality. If we lose our water quality, we lose our entire bay. Those oysters are the key to that. Without those, we have nothing here in Franklin County, and I would like for you to very seriously consider those impacts that are happening from the top to the bottom, and really look at the way the federal system is managed and manage it in a federal way, which is in the best interest of all of the users up and down the river system here. That's it.

Comment ID: 54
Author Name: Dan Tonsmeire
Organization: Apalachicola River Keepers

The Apalachicola Basin is a distinctive, highly productive and bio-diverse area of North America. Within its boundaries are: •
Highly productive farmlands and springs of Jackson and Gadsden counties. • Vast pine and floodplain forests of Calhoun, Liberty, Franklin and Gulf counties. • Coastal estuaries and Gulf waters of Franklin and Gulf counties, which team with commercially harvested oysters, crab, mullet, shrimp, scallops, grouper, snapper and many other seafood delicacies harvested by the tons. • Harvest representing over 10% of the national oyster and 90% of the State of Florida oyster production comes from Apalachicola Bay. Additionally, harvest from the River and Bay of shrimp, finfish, blue crab, crawfish, and eel are commercially important on a national and regional scale. It should also be recognized that the contributions of the Apalachicola estuary to the commercial seafood harvest is significant as one of the most productive bays remaining on the Gulf of Mexico. •

Comment ID: 282
Author Name: Lesley Cox
Organization:

Minimum flows are significantly harming the river and bay ecology.

Comment ID: 403
Author Name: L Levi
Organization:

Sustained minimum flows as defined by the RIOP (4750-5000 cfs at Woodruff Dam) will not sustain commercial seafood industry in Apalachicola Bay.

Comment ID: 514
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.

Mimic Natural Flow Regimes (Fish and Wildlife)

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

: ADCNR recommends that the COE review existing data and conducts monitoring studies to determine the present state of aquatic wildlife in river reaches below projects. Using an adaptive process, the COE should evaluate various modeled flows for COE projects to mimic a natural flow regime throughout the ACF. The biological response produced by the environmental flows would be evaluated, and if deemed necessary, adjusted to meet the objective of maintaining ecological integrity.

Minimum Flows a Function of Storage Available (Fish and Wildlife)

Comment ID: 747
Author Name: Michael Ceigler
Organization:

In my opinion we need to manage the expectations of the recreational and commercial fishing users of water in the ACF basin. More specifically, the legally required flow on the Apalachicola river should be proportional to the total amount of water in the storage facilities in the ACF basin.

Protect Apalachicola Bay and Oysters (Fish and Wildlife)

Comment ID: 13
Author Name: Noah Lockley
Organization: Franklin County Board of County Commissioners

The Franklin County Board of County Commissioners represents the residents of Franklin County. The Board, in representing its constituents, has an inherent interest in the welfare of the lower River and Bay. The Board believes that the Water Control Manual (WCM) for the ACF system is fundamentally flawed because it will not adequately take into account the freshwater needs of the Bay.

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Author Name: Joseph Parrish
Organization:

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Comment ID: 692
Author Name: Leonard Montgomery
Organization:

This Bay MUST be preserved as in the past. The water supply from up river must not be restricted in any way. The loss of the oysters just can not happen.

Hydrodynamic Modeling (Fish and Wildlife)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Apalachicola Bay Habitats and Fisheries – The biological organization of Apalachicola Bay is controlled largely by riverine influences on its salinity, turbidity, and sedimentation rates (Livingston 1991). We encourage the Corps to apply a spatially-explicit hydrodynamic model of the bay to assess the effects of alternative operations on salinity regimes, and in turn, on the relative distribution of salt marshes, submerged grass beds, and oyster bars in the bay.

OTHER BIOLOGICAL ISSUES

Habitat (Biological Resources)

Comment ID: 6
Author Name: Heinz J. Mueller
Organization: EPA

The EIS should include a discussion on secondary effects (actions that happen later in time) on major water chemical, physical, and biological characteristics. The discussion on the chemical characteristics could relate both the water velocity and volumes to, at least, temperature, dissolved oxygen, and conductivity. Detailed discussions on major physical characteristics could include frequency of riparian habitat inundation, and distribution or re-distribution of sediment particles based on sediment particles and flow energy (size/load related to velocity), and maintenance of benthic habitat.

Comment ID: 26
Author Name: Donald Smiley
Organization:

The soil has become too dry. You know, I think a lot of the reason for that is, is because of the dredging that was done by the Corps of Engineers, the disposal of the dredge spoil they have dredged out of the river and dumped into the river swamps that's filled in areas were Tupelo trees grow.

Comment ID: 30
Author Name: Joseph Parrish
Organization:

The flood plain trees are dying at. The world's largest stand of Tupelo trees are being considerably damaged.

Comment ID: 43
Author Name: Students of River Basin Management
Organization:

6) Include research and experimentation to encourage species habitat connectivity. Acknowledge that reservoirs fragment the basin by blocking passage for anadromous fish. 7) Address the potential impact of increased municipal and agricultural withdrawals for the future management of the reservoirs.

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

We recommend that you include within the EIS a Biological Assessment of effects on these species and their designated critical habitats as required by the implementing regulations (50 CFR §402.12) for section 7 of the ESA. From our previous consultations with you on the releases from Woodruff Dam, your staff is already aware of the sources of information about listed species and their habitats in the action area, and also of the kinds of assessment methods that we consider most useful in evaluating potential changes in flows. Nevertheless, our staff biologists are available to assist you with developing appropriate content for the assessment. Likewise, we will coordinate with you a schedule for completing section 7 consultation in advance of your Record of Decision. In addition, each of the three states maintains databases of rare and imperiled species that may receive protection under state laws. We encourage the Corps to contact the states directly and obtain current lists of resources of concern to the state fish and wildlife agencies that could be affected by project operations. Web addresses that

provide contacts and resources information are: Alabama: http://www.outdooralabama.com/research-mgmt/6/ Florida: http://myfwc.com/imperiledspecies/ http://www.fnai.org/ Georgia: http://www.georgiawildlife.com/rareorendangeredspecies_conservation.aspx

St. Vincent National Wildlife Refuge is an island among the chain of barrier islands that forms Apalachicola Bay. Although ACF project operations influence the bay by regulating fresh water inflow coming from the Alabama and Georgia portions of the basin, the resources of principal management concern on the refuge are not directly affected by this inflow. At this time, we have no specific resources associated with St. Vincent NWR that we request the Corps to consider in the WCM update or EIS

Invasive Aquatic Plants – Noxious growths of various exotic species, such as hydrilla and Eurasian milfoil, have become a constant management concern at the ACF federal reservoirs, especially at Lake Seminole and Lake Eufaula. We encourage the Corps to investigate the feasibility of occasional draw downs for controlling aquatic plants as part of this WCM update.

Floodplain Habitats – Floodplain habitats are vital to the health of the riverine and estuarine communities of the ACF Basin. Darst and Light (2008) found that floodplain forests of the Apalachicola had shorter flood durations, were drier in composition, and had 17 percent fewer trees in 2004 than in 1976. The Corps should evaluate the effects of past and proposed project operations on flood durations and floodplain habitats.

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

Species of Greatest Conservation Need (CCN) Congress through the Wildlife Conservation and Restoration Program (WCRP) and the State Wildlife Grants (SWG) Program required each state fish and wildlife agency to design and implement a comprehensive approach to the conservation of America's resources by October I, 2005. Alabama has completed the "Comprehensive Wildlife Conservation Strategy" (CWeS), and the plan is in the implementation phase. Altogether, 314 aquatic and terrestrial wildlife species were identified as in greatest conservation need. These GCN fauna include 24 mammals, 26 reptiles, 14 amphibians, 28 birds, 57 fish, 93 mussels, 34 aquatic snails and 28 crayfishes. GCN species are associated with 15 key habitats and 15 river basins. Threats and conservation actions have been identified for each GCN species. Recommendation: ADCNR recommends the development of a new water control manual for the ACF which should reflect wildlife conservation actions identified in Alabama's CWCS where appropriate. Sincerely, WILDLIFE & FRESHWATER FISHERIES Stanley F. Cook, Chief of Fisheries

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Comment ID: 52
Author Name: V.M. Perry, Jr.
Organization: Lake Lanier Association

Maintenance of a Navigation Channel as a Corps Operation We request that navigation be abandoned as a function of the Corps' ACF operations. The Corps' studies have shown that dredging to maintain the required 9-foot channel is not only extremely impractical and costly but directly detrimental to the threatened and endangered species in the Apalachicola River and its environs. The result is a damaged river system that puts additional pressure on upstream resources such as Lake Lanier to compensate for the deteriorating riverbed and deleterious effects on habitat. The state of Florida has refused for a number of years to grant a permit to the Corps for depositing dredged material. Modern-day transportation has reduced the use of the ACF for that purpose to a trickle. Maintaining a navigation channel is an anachronism that should be eliminated from the Corps' operations of the ACF.

Comment ID: 142
Author Name:
Organization:

Would love to see more effort made to preserve and protect shoreline along this section of the Chattahoochee. Take whatever measures necessary to prevent/minimize development.

Aquatic Plants (Water Resources)

Comment ID: 207
Author Name: Lillian Ford
Organization:

I for one live on the north end of Troup County. We have several problems. The lake is filling in at an alarming rate. In a matter of a few years I won't have water under the dock. At pool full we don't have 5 feet of water. Now we have water plants taking over. Never should this lake be destroyed as it was last year.

Aquatic Plant Control (Fish and Wildlife)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Invasive Aquatic Plants – Noxious growths of various exotic species, such as hydrilla and Eurasian milfoil, have become a constant management concern at the ACF federal reservoirs, especially at Lake Seminole and Lake Eufaula. We encourage the Corps to investigate the feasibility of occasional draw downs for controlling aquatic plants as part of this WCM update.

Wetlands (Biological Resources)

Comment ID: 6
Author Name: Heinz J. Mueller
Organization: EPA

The Mobile District should address and fully document the effects of the proposed action(s) on wetlands.

Balance All Basin Interests (Fish and Wildlife)

Comment ID: 59
Author Name: Darryl Lanier
Organization:

if the level of Apalachicola bay dropped the same amount as Lake Lanier (18 +/- feet) there wouldn’t be any water left in the bay at all!.. Agreed, we need to conserve water in Atlanta and I’m doing my part, but we also need to moderate the amount of our precious resource that is allowed to run into the Gulf of Mexico. Once it has left Lake Lanier there is no getting it back.. Perhaps trying to prevent salt water from coming into Apalachicola bay is like trying to stop a hurricane. It is just destined by forces of nature. I love Apalachicola and Apalachicola bay but I think that there may not be enough rain in the North Georgia watershed to keep the lower river and bay from getting saltier even if Atlantans stop showering, washing cars and watering their yards.

Comment ID: 245
Author Name: Randy Nix
Organization:

It is critical that all interest be considered equally-Florida's cry about endangered species MUST be considered in light of all species up and down the basin, from spawning fish in West Point lake to PEOPLE in Atlanta.

Comment ID: 567
Author Name: Charles Bannister
Organization: Gwinnett County

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.

Research (Fish and Wildlife)

Comment ID: 43
Author Name: Students of River Basin Management
Organization:

6) Include research and experimentation to encourage species habitat connectivity. Acknowledge that reservoirs fragment the basin by blocking passage for anadromous fish. 7) Address the potential impact of increased municipal and agricultural withdrawals for the future management of the reservoirs.

Monitoring Species (Monitoring)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

Finally, because populations of several federally listed species were fragmented due to reservoir development, we encourage the Corps to participate with the Service and other federal and State agencies in efforts to locate and monitor extant populations in the remaining unimpounded portions of the Chattahoochee River and its tributaries. Historically, the purple bankclimber, shiny-rayed pocketbook (Hamiota [Lampsilis] subangulata), Gulf moccasin shell (Medionidus penicillatus), and oval pigtoe (Pleurobema pyriforme) were all found in the Chattahoochee River. Except for a single live bankclimber found in Goat Rock Reservoir, all are now extirpated from the mainstem, and isolated populations are known to persist in only three tributaries: Uchee Creek, Sawhatchee Creek, and Kirkland Creek.

Comment ID: 669
Author Name: Blair Anderson
Organization:

Please give more weight to the current overall water release scheme that is currently in place. I would think as most residents do, that the potential negative affects of this "new" policy of continual release at these low levels is completely non-sensical or in better terms, unreasonable. The needs of the people and the many residents surrounding such a 'once' beautiful lake far outweigh the needs of fish life, mussels. When water levels go down further aren't we endangering our own Lake's water life endangering the fish that live here as well as the safety and value of lake residents' property?? ..let alone possibly cutting off water supplies to 12 million+ people?

I am sure you have heard these comments before and hope that you are now not rolling your eyes as you read yet another letter from a taxpayer inquiring about what is going on with current policy. Please take these comments, feedback seriously. The responsibility you have at the Corps is great. I appreciate the great responsibility, and yes, respect it greatly. As most people, I cannot fathom all the complexities that go into your management duties. Most of us out here are not asking you to re-invent the wheel of how the Corps does things. I think if you had the ear of some of us and wanted to more strategically curtail responses/letters/inquiries of what the heck is going on, a refinement of your communication is what is in order. Maybe you are doing everything right. I wouldn't know because your(the Corps) bureaucratic communication has not hit me. Is there any possibility that the Corps can communicate clearly what it is currently doing, what it has been doing in the past, what has changed since 2006/2007 full pool lake levels? Maybe open and straight talk about where you, the Corps are at, will help justify what you are doing, why you are doing it, why it is not a catch-22, and why/how the lake level will come back. All Georgia Americans/taxpayers are reasonable and support their federal and state run agencies when things are well explained and appear justified. Helping our neighbors in trouble (compassion)is a good thing but there comes a time when those that help (their resources) start to end and the extent of help (the reaching out and giving) must end. Compassion overload has set in with the mussels and the other states that are screaming for Georgia's Lake Lanier water.

What about us in Georgia who plan on relying on this water as humans? Haven't we helped out enough down stream from Lanier? If it isn't enough, tell us why it isn't enough and we may support the continued policy. If you can't reasonably justify what you are doing to the people (citizens) whom are paying for your services/offices/resources/salaries maybe it is time to change your policy to a policy that does reasonably justify what is happening to Georgia's resource. I take seriously the word reasonably and do not feel I have enough information to justify to my neighbor why the lake is where it is at with water levels. Does that seem right to the Corps directors? If there is some link to a reasonably worded update on where the Corps policy is on water management specific to our great Lake Lanier? I would as well as many of my neighbors would love to see it. I request this as I have an interest in this as I am an adjacent landowner indirectly paying for the corps oversight.

Nothing helps greater in understanding than communication.

If someone can respond great, if not, fine...

Ensure Compliance With All Federal Law (Fish and Wildlife)

Comment ID: 55
Author Name: Brian Atkins
Organization:

Another aspect of the manual update process should consider the Corps' compliance with existing environmental laws. Since the federal reservoirs were constructed, Congress, Alabama, Florida and Georgia have enacted a number of laws and regulations designed to protect and enhance the quality of the environment, including the Clean Water Act and the Endangered Species Act. In operating the federal projects in the ACF Basin, the Corps must avoid operations that will violate or lead to violations of water quality standards or will cause directly or indirectly the take of an endangered species or impacts to critical habitat. As part of its effort to update the water control manuals at the federal reservoirs in the ACF Basin, the Corps should ensure that even under drought conditions, sufficient flow is maintained below each dam, so that water quality standards and endangered species are protected. Specifically, the Corps should coordinate with the Fish & Wildlife Service, the EPA and appropriate state agencies in Alabama and Georgia to ensure that the water control manuals are compliant with the Endangered Species Act and the Clean Water Act.

Connections to Backwater Areas (Fish and Wildlife)

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

Fish Passage
Dams, in most cases, block the movement of catadromous, anadromous, and riverine fish species. This has resulted in fragmentation of native fish ranges which will disrupt life cycles of fish that depend on movement to specific locations to spawn, overwinter or over summer. Long term river fragmentation will result in reducing the size of the gene pool and restricting genetic diversity. Mussel populations will also be impacted by fish movement restrictions since fish are necessary to complete their life cycle. Recommendation: ADCNR recommends that the COE establish a goal to develop a fish passage plan for all COE locks and dams in the ACF. A fish passage plan should identify key species which need upstream and downstream movement. With those species in mind, evaluate viable fish passage methods. A lock passage program similar to the one currently employed by the COE at Woodruff Lock and Dam would be a good starting point. This would greatly benefit adult migratory fish such as striped bass, Alabama shad, American eel, Gulf sturgeon, and many other fish species.

(5) maintain channels to backwater coves to provide angler access to these productive fishing areas, and to maintain a water connection
between the main-stem river and backwater coves. These backwater areas are important nursery areas for rearing stages of many fish and invertebrate species.

Other (Fish and Wildlife)

Comment ID: 45
Author Name: Gail Carmody
Organization: Fish and Wildlife Service

We make this very general request because we suspect that considerable enhancements are possible for fish and wildlife resources, in both the river and reservoir environments. Such enhancements may be possible with modest changes in storage and release rules throughout the basin and not be inconsistent with project authorizations.

Comment ID: 49
Author Name: Stanley F. Cook
Organization: AL Department of Conservation and Natural Resources

Species of Greatest Conservation Need (CCN) Congress through the Wildlife Conservation and Restoration Program (WCRP) and the State Wildlife Grants (SWG) Program required each state fish and wildlife agency to design and implement a comprehensive approach to the conservation of America's resources by October I, 2005. Alabama has completed the "Comprehensive Wildlife Conservation Strategy" (CWeS), and the plan is in the implementation phase. Altogether, 314 aquatic and terrestrial wildlife species were identified as in greatest conservation need. These GCN fauna include 24 mammals, 26 reptiles, 14 amphibians, 28 birds, 57 fish, 93 mussels, 34 aquatic snails and 28 crayfishes. GCN species are associated with 15 key habitats and 15 river basins. Threats and conservation actions have been identified for each GCN species. Recommendation: ADCNR recommends the development of a new water control manual for the ACF which should reflect wildlife conservation actions identified in Alabama's CWCS where appropriate. Sincerely, WILDLIFE & FRESHWATER FISHERIES Stanley F. Cook, Chief of Fisheries

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Comment ID: 60
Author Name: Denesia Cheek
Organization: National Park Service

In addition, as a land management agency we are responsible for the following congressional authorizations: Water Supply Act of 1958, Endangered Species Act of 1973, and Fish and Wildlife
Coordination Act of 1958. We appreciate the opportunity to submit comments at this time and hope that you will take them into consideration. We will continue to be engaged in the process and appreciate opportunities to further collaborate. Should you have additional questions and/or comments, you can contact Denesia W. Cheek, NPS Southeast Regional Hydrologist at (404) 562-3113 ext. 510 or denesia_cheek@nps.gov.

Comment ID: 69
Author Name: Jeff Brown
Organization: Troup County Chamber of Commerce

Dear Colonel Jorns:
The West Point Lake Advisory Council was established in January, 2007 by the Troup County Chamber of Commerce. Our initial goal was to raise $250,000.00 to fund separate studies on environmental issues relative to West Point Lake affected by how the United States Corps of Engineers manages the lake, an economic impact analysis of same, as well as to investigate whether there are any environmental justice issues resulting from their management. We raised $282,000.00 and all three studies have been completed. Since the inception of our council, we have worked very closely with the City of LaGrange. What follows is the letter they have sent you. Since the content of that letter has evolved with our council being very involved, we understand what is being said and endorse if 100%. Being a committee of the Chamber, we believe that it best serves our 800+ members.
No single public resource in the west Georgia, east Alabama region exerts more social, environmental, and economic influence than the West Point Lake Project. As such, it is important that Scoping for the Environmental Impact Statement for updated and new Water Control Manuals for the Apalachicola-Chattahoochee-Flint River system recognize that critical operating changes must be made at West Point Lake for the project to fulfill its obligations as mandated by Congress when it authorized the project in 1962.

Congress established 5 specific PRIMARY authorized uses for the project:

- Hydropower
- Sport fishing and Wildlife development
- General recreation
- Navigation
- Flood Control

In the report of the Corps Chief Engineers to Congress, it was clear that General Recreation and Sport fishing and Wildlife development when combined carried along with hydropower development the vast majority of the financial benefit assigned to the project. This report was completed in the context of development and social economic activity of the era around 1962 when west Georgia and east Alabama were largely rural and undeveloped.

Since that time, changes have occurred in this region that demand even more attention by the Corps of Engineers on the primary authorized uses of sport fishing, wildlife development, and general recreation. This region is growing rapidly and is now totally surrounded by the massive population growth of the Atlanta, Auburn Opelika, and Columbus MSA's. New influences have taken over and control the environment and socio-economic factors that relate to the utilization of the lake. Many of these have not been addressed or are ignored by the Corps in its operations. These include massive urbanization and growth of the area and counties surrounding the lake, industrial development from sources such as the KIA manufacturing complex, the growth of the Fort Benning complex and its contingent of citizens and soldiers that often rely on West Point Lake's facilities for recreation and sport fishing and wildlife.

Yet what we have observed is that the Corps operates the lake and the system in its own way that ignores the original PRIMARY congressional authorizations, while focusing exclusively on flood control needs and addressing downstream and upstream demands that may not even meet the purposes set forth by Congress.