NAVIGATION 2
NAVIGATION 2
Commercial Navigation (Infrastructure and Utilities) 2
Commercial Navigation (Socioeconomics) 2
Support Navigation (Navigation) 3
Do Not Support Navigation (Navigation) 9
Environmental Impacts of Dredging (Navigation) 10

NAVIGATION

NAVIGATION

Commercial Navigation (Infrastructure and Utilities)

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

This is especially necessary since the railroad companies are not willing to work with shippers in that they have a monopoly for transport operations. I know water is essential for the population to drink, but adequate thought and restrictions as to new construction should be strictly enforced.

Commercial Navigation (Socioeconomics)

Comment ID: 51
Author Name: Billy V. Houston
Organization: Tri Rivers Waterway Development District

Communities in the Lower Portions of the Basin Depend on the Corps' Provision of Adequate Flows. Communities and businesses located and grew in cities like Dothan, Eufaula, and Phenix City, Alabama, and Bainbridge, Columbus, and La Grange, Georgia, with the full expectation that the Corps would operate the ACF reservoirs according to the laws authorizing their construction and operation. Those communities spent millions of dollars to build public works projects as well as infrastructure including the Eufaula Inland Dock, the Phenix City Inland Dock, and the Columbia Inland Dock in Alabama and the Port of Columbus and Port Bainbridge in Georgia. Those facilities made it possible for local communities to sell and ship agricultural, silvicultural and mineral
products in bulk and to receive large deliveries of fuels and fertilizers by barge. Companies including TRWDA members Georgia Pacific, MeadWestvaco and Southern Nuclear Company sited and built major industrial facilities on the Chattahoochee River based in large part on the federal commitment that flows sufficient to serve the Congressionally authorized purposes would provide for their industrial cooling and discharge assimilation. They also expected to reap the benefits associated with barge transport of fuel and bulk products provided by a reliable navigation channel. Not only have these communities and businesses acted and invested in reliance on the Corps' lawful operation of the ACF reservoirs in the past, but they are counting on adequate flows for their future survival. Industry and commerce will continue to grow in southeastern Alabama and southwestern Georgia with adequate flows and channel maintenance. Several new economic opportunities which depend on flows in the Chattahoochee and Apalachicola Rivers have recently been developed or are under serious consideration. The Corps and the cities of Columbus, Georgia, and Phenix City, Alabama, have been working on a river restoration project involving the removal of two small, historic dams to improve habitat and create a whitewater recreation course. Riverway South—an organization extending across all three ACF states—is actively promoting eco-tourism, and its success depends on the assurance of a safe and reliable navigation channel from Columbus, Georgia, south to the Gulf of Mexico. Longleaf Energy Associates has a permit to site a new energy production facility on the Chattahoochee River in Early County, Georgia, and the company plans to begin construction next year. Several projects which include marinas or other river-based recreational opportunities have recently opened, are under development, or are in serious consideration, including a new marina which recently opened in Bainbridge, Georgia; the Trail's End Resort and Marina on Lake Seminole; a proposed new marina near the National Infantry Museum in Columbus, Georgia; a proposed marina and nature trail in Quitman County, Georgia; and a kayak venture proposed for Chattahoochee, Florida. Without adequate flows and safe and reliable navigation, these opportunities for economic growth and business development will be subject to difficult challenges. TRWDA urges the Corps to explain in its revised manual and the accompanying environmental documentation how it intends to provide for the needs of the communities and industries located in the middle and lower portions of the ACF River System.

Comment ID: 106

Author Name: ELMON L. GARNER
Organization:

This is especially necessary since the railroad companies are not willing to work with shippers in that they have a monopoly for transport operations. I know water is essential for the population to drink, but adequate thought and restrictions as to new construction should be strictly enforced.

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

Columbus Water Works Columbus Water Works (CWW) appreciates the opportunity to provide input for the update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) River basin in Alabama. Florida and Georgia. The Chattahoochee River has always played a major role in the life of Columbus. That role is expanding even more today. A river restoration project which involves breeching two small dams promises to restore the river to a more natural state and accommodate the establishment of a whitewater rafting enterprise and increased tourism and recreational activities. The Corps has engaged in considerable study of this project and it continues to make progress. Currently, there are plans to develop a major marina complex to complement the National Infantry Museum. Oxbow Meadows Environmental Learning Center and the continuing development of this once blighted area. Also, Columbus and Phenix City, Alabama support the redevelopment of this area a major inland port. A report by Troy University addressing 1) navigation; 2) recreation; 3) water supply; 4) assimilation: 5) real estate; and 6) power calculates the economic impact on the Apalachicola-Chattahoochee-Fling (ACF) system and concludes that navigation is potentially significant economic benefit to this area.

Comment ID: 587
Author Name: Robert Tant
Organization: Columbus Water Works

Water Works Columbus Water Works (CWW) appreciates the opportunity to provide input for the update of the Water Control Manual for the Apalachicola-Chattahoochee-Flint (ACF) River basin in Alabama, Florida and Georgia, The Chattahoochee River has always played a major role in the life of Columbus. That role is expanding even more today. A river restoration project which involves breeching two small dams promises to restore the river to a more natural state and accommodate the establishment of a whitewater rafting enterprise and increased tourism and recreational activities. The Corps has engaged in considerable study of this project and it continues to make progress, Currently, there are plans to develop a major marina complex to complement the National Infantry Museum. Oxbow Meadows Environmental Learning Center and the continuing development of this once blighted area. Also, Columbus and Phenix City, Alabama support the redevelopment of this area a major inland port. A report by Troy University addressing 1) navigation; 2) recreation; 3) water supply; 4) assimilation: 5) real estate; and 6) power calculates the economic impact on the Apalachicola-Chattahoochee-Fling (ACF) system and concludes that navigation is potentially significant economic benefit to this area.

Comment ID: 778
Author Name: Philip Burton
Organization:

Navigation while in the early years may have been a viable option for the transportation of freight. It has become an impractical way to ship goods in today’s busy commerce and the needs for quick and timely delivery of goods with our roadways now available to better handle almost all of the consumer’s needs and being much more cost effective.

Support Navigation (Navigation)

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

Revisions to the Manual Must Recognize Navigation as a Primary Project Purpose and Reflect

Statutory Intent to Support Downstream Communities. A primary purpose of all the ACF reservoirs is to support navigation. Navigation on the Chattahoochee and Apalachicola Rivers is obviously limited, as it always has been, to points between the Gulf of Mexico and the fall line at Columbus, Georgia. Most of the ACF projects also support hydropower; however, the lowermost hydropower facility (Woodruff) is a run-of-¬river project with no storage capacity, as is Andrews, the nearest upstream reservoir. If navigation is (and has been) limited to points below the fall line, and the hydropower project farthest downstream is run-of-river, MWV agrees with TRWDA that the inevitable conclusion is that Congress intended for the Corps to operate the upstream storage reservoirs, and especially the reservoir with the most storage capacity, substantially for purposes that would be realized in the lower regions of the ACF Basin. Any revisions to the manual must be consistent with that clear demonstration of Congressional intent. MWV is aware of the steep reduction in commercial navigation which has impacted the ACF River System in recent years. However, changes in usage in recent years do not alleviate the Corps of its statutory obligation to support navigation as it revises the water control manual. The critical limitation on navigation is the lack of proper maintenance of a few small stretches of the Apalachicola River, which blocks access from the Chattahoochee and Flint Rivers to the Gulf of Mexico. However, channel maintenance is the Corps' responsibility under federal law. Thus, the primary hindrance to navigation in the ACF system is the Corps' failure to maintain it. The Corps must not and cannot lawfully use its own failure to perform its statutory obligations to maintain the Apalachicola River for navigation as a basis to unilaterally reorder the project purposes without Congressional approval. To justify its failure to maintain the channel, the Corps has cited a decision of the Florida Department of Environmental Protection ("FDEP") in 2005 to deny certain environmental authorizations for the Corps' channel maintenance activities. Like TRWDA, MWV remains concerned that the Corps would so easily place itself in a subservient position to a state and allow a state agency to control federal activities. Nevertheless, MWV shares the concerns of FDEP and environmental groups with respect to the environmental impacts of certain dredging and disposal practices of the past. However, MWV is convinced there are solutions for the Corps to resume channel maintenance activities in a manner acceptable to FDEP and all affected parties, if only the Corps will once again actively pursue FDEP authorization. Aside from MWV's interest in navigation, we believe the Corps' provision of flow sufficient to support navigation will meet other purposes and legal requirements. Such flows will support industrial and municipal requirements, which were discussed further in Section 2 above. 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.

Water Supply Is Not an Authorized Purpose of Lake Lanier. As noted above, the primary purposes of Lake Lanier are hydropower, flood control, and support of downstream navigation. According to the Corps' report as reprinted in House Document 300, the provision of hydropower and downstream navigation on a cost-effective basis... . . . cannot be secured by the plants below Columbus proposed herein unless a considerable storage be provided upstream to increase the minimum regulated flow and the firm capacities at those plants; without such upstream storage, the development would not be economically justified. The best development for that purpose is that at Buford proposed herein. H.R. Doc. No. 80-300 at 39 (1946) (emphasis added). In other words, the Buford project was necessary to support navigation and hydropower production below the fall line, and was constructed for the purpose of maintaining minimum flows sufficient to support hydropower and downstream navigation. Congress approved House Document 300 and authorized the Buford project on that basis. Pub. L. No. 79-525,60 Stat. 634, 635 (1946)). Congress anticipated that Lake Lanier and the other reservoirs would likely serve other purposes as well, including water supply. House Document 300 states that releases from Buford should be sufficient "so as to insure at all times a flow of Atlanta not less than 650 second-feet." H.R. Doc. No. 80-300 at 34 (1946). That flow level was deemed necessary "to meet the estimated present needs of the city, and to prevent damage to fish, riparian owners, and other interests by complete shutdowns" during off-peak hydropower production times. Id. (emphasis added). However, by addressing only the "present" needs of the city, House Document 300 clearly signaled to Atlanta more than 50 years ago that Lake Lanier would not indefinitely provide ever-increasing supplies of water for local consumption. To the contrary, use of Lake Lanier for water supply was authorized only to the extent consistent with the primary project purposes. Again, according to House Document 300, Lake Lanier "would ensure an adequate municipal and industrial water supply for the Atlanta area, would produce large benefits in the way of recreation, fish and wildlife conservation, and similar matters," but only "[incidentally" to the service of the reservoir's primary purposes. Id. at 39 (emphasis added). Section 301 of the federal Water Supply Act of 1958 also requires the Corps to provide water for local consumption only to the extent possible without compromising the primary

authorized purposes. Pub. L. No. 85-500, Title III, § 301, 72 Stat. 297, 319-20 (1958), codified as amended at 43 U.S.C. § 390b. According to that statute: Modifications of a reservoir project . . . to include storage . . . which would seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed, or which would involve major structural or operational changes shall be made only upon the approval of Congress as now provided by law. 43 U.S.C. § 390b (d) (emphasis added). The Corps has long interpreted Section 301 to limit allocation of storage for water supply to the lesser of 15% of a project's total storage or 50,000 acre-feet. ER 1105-2-100, ~ 3.8.b (5). That is an accurate reflection of longstanding federal policy to view water supply as primarily a local, not federal, responsibility.

Comment ID: 44
Author Name: Steve Leitman
Organization:

How will the three principal storage reservoirs be balanced? • Multiple levels of channel availability for the federal navigation project should be considered. Historically, the project has been approached on all-or-nothing basis. Either we have full channel availability or no channel at all. The examination of releases to support a seasonal navigation project which would have very little or no dredging should be investigated as part of the Water Control Manual update.

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

Navigation -- Navigation is an authorized project purpose and the Corps has used reservoir storage in the past to support navigation. In recent years, though, lacking water quality certification to maintain the channel in Florida, we have seen only occasional flow management for the navigation purpose. How will the WCM update address navigation? Current physical channel conditions dictate the flows that will provide the authorized channel dimensions. Short of providing flows to meet channel depth authorizations maintaining channel conditions by dredging would be indicated. Dredging has significant adverse effects to fish and wildlife. If flows for navigation are included in the WCM update, the Corps should also outline dredging needs, if any, and evaluate the effects of the channel maintenance activities that would be necessary under the conditions specified for navigation flow support. If flows for navigation are not included in the WCM update, the Corps should consider if the current policy of a four-zone operational scheme could be improved and/or simplified.

Comment ID: 47
Author Name: Mike Godfrey
Organization:

The Corps must support navigation on the Apalachicola and Chattahoochee Rivers. In addition to flow assumptions, another primary factor in the siting of Plant Farley was proximity to a federally authorized and maintained navigable river. Most of the large equipment for the original plant construction was delivered by barge. In 2000 and again in January of 2006, barge transportation to and from the plant was necessary for vital equipment replacement and maintenance activities. No other mode of transportation to Farley was adequate for those purposes. Inadequate provision for reliable navigation will increase costs for Plant Farley and limit the potential for future expansion. Navigation is one of the principal authorized purposes of the ACF River Basin reservoir system as authorized by Congress. Each of the Corps' ACF reservoirs plays a critical role in maintaining navigation in the ACF River Basin. For example, the current reservoir regulation manual for Jim Woodruff Reservoir describes Woodruff as "a multipurpose project created primarily to aid navigation in the Apalachicola River below the dam and in the Chattahoochee and Flint Rivers above the dam and to generate electric power." Apalachicola River Basin Reservoir Regulation Manual, Appendix A, Jim Woodruff Reservoir at A-I0 (1972 & Rev. July 1985). To this end, the Corps is directed to maintain Woodruff at an elevation of approximately 77 ft MSL while continuously releasing inflows to the Apalachicola River in order to support a nine foot deep navigation channel. !d. at A-16, A-17. Continuous navigation operations are to be curtailed only during unusual low-flow events, consistent with static head limitations. Jd. at A-18. Upstream, the George W. Andrews Reservoir is described in its Reservoir Regulation Manual as "a single purpose project designed to aid navigation by providing a 9-foot navigation channel and by maintaining a more uniform downstream flow." Apalachicola River Basin Reservoir Regulation Manual, Appendix D, George

W. Andrews Reservoir at D-5 (Rev. Feb. 1978). Andrews, like Woodruff, is a run-of-river project, and it aids
navigation primarily by passing inflows released from upstream projects. All efforts are to be made to ensure Andrew's tailwater does not drop below 77 ft MSL-the minimum needed to maintain a nine foot navigation channel. See id. at D-26. When Andrews can no longer support this tailwater elevation, "arrangements may have to be made for limited operation of the Walter F. George power plant, or for equivalent spillway discharges." Id. Indeed, all three of the upstream reservoirs are required to support navigation from Columbus, Georgia, to the Gulf of Mexico. As the Corps' 1989 Draft Water Control Plan recognizes, "all three of the major storage projects will be utilized to provide the designated level of support" for navigation "for as long as possible and, of course, preferably year-round." ACF Basin Water Control Plan at 17-18 (Draft Oct. 1989). As explained above, Plant Farley was designed and built on the assumption that the Corps would ensure a minimum elevation of 76 ft MSL between Andrews and Woodruff for as much of the year as possible. When the ACF reservoirs are operated to meet the elevation and flow targets specified in the Woodruff and Andrews Reservoir Regulation Manuals, Plant Farley's operational requirements are met. Recently, the Corps has not maintained the Apalachicola River to provide for safe and reliable navigation, largely due to the State of Florida's denial of authorization pursuant to Clean Water Act ("CWA") Section 401, the Coastal Zone Management Act ("CZMA"), and various state statutes and regulations. As a result, commercial barge traffic from Alabama and Georgia to the Gulf of Mexico has all but ceased. Nevertheless, the Corps is responsible for maintaining navigation in the ACF River Basin not withstanding Florida's decision. CWA Sections 404(t) and 511(a) provide sufficient authority for the Corps to proceed with navigation maintenance despite Florida's denial of a Section 401 permit. Additionally, Florida's coastal management program does not provide an independent basis to block navigation maintenance on the Apalachicola River. Under CZMA Section 307(e), the consistency review program may not be construed as diminishing, superseding, or modifying existing federal responsibilities over navigable waters. The Corps cannot use its failure to maintain the navigation channel and the subsequent reduction in barge traffic as a basis for not operating the reservoirs for navigation.

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 RlOP 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: 51
Author Name: Billy V. Houston
Organization: Tri Rivers Waterway Development District

Revisions to the Manual Must Recognize Navigation as a Primary Congressionally Authorized Purpose and Reflect Statutory Intent to Support Downstream Communities. A central and consistent Congressionally authorized purpose of all the ACF reservoirs as enacted by Congress is to support navigation. Commercial navigation on the Chattahoochee and Apalachicola Rivers has been historically limited to points between the Gulf of Mexico and the fall line at Columbus, Georgia. Most of the ACF projects also support hydropower; however, the lowermost hydropower facility
(Woodruff) is a run-of-river project with no storage capacity, as is Andrews, the nearest upstream reservoir. If navigation is limited to points below the fall line, and the hydropower project farthest downstream is run-of-river, the inevitable conclusion is that Congress intended for the Corps to operate the upstream storage reservoirs, and especially the reservoir with the most storage capacity, substantially for purposes that would be realized in the lower regions of the ACF Basin, including navigation. Any revisions to the manual must be consistent with that clear demonstration of Congressional intent. TRWDA is well aware of the reduction in commercial navigation which has occurred in the ACF River System in recent years. However, a major contributing factor was the failure of the Corps to properly maintain the channel, and the Corps must not ignore its statutory obligation to provide navigation as it revises its water control manual. The critical limitation on navigation is the lack of proper maintenance of a few small stretches of the Apalachicola River, which blocks access from the upstream Chattahoochee and Flint Rivers south to the Gulf of Mexico. However, channel maintenance is the Corps' responsibility under federal law. (1) The primary hindrance to navigation in the ACF system is the Corps' failure to provide it. The Corps must not and cannot lawfully use its own failure to perform its statutory duty to maintain the Apalachicola River for navigation as a basis to unilaterally reorder the project purposes without first obtaining Congressional approval to do so. To justify its own failure to maintain the navigation channel, the Corps has cited a 2005 decision of the Florida Department of Environmental Protection ("FDEP") to deny certain state environmental authorizations for the Corps' channel maintenance activities. TRWDA remains concerned and disappointed that the Corps would so easily place itself 1 TRWDA provided a thorough explanation of the Corps' obligation to maintain the Apalachicola River for navigation in a petition to the District Engineer and the Chief Engineer dated March 2, 2006, asking the Corps to resume navigation maintenance pursuant to Section 404(t) of the Clean Water Act. We trust that document remains available to the Corps, but we will be pleased to provide the Corps additional copies if needed. in a subservient position to a state and allow a state agency to veto the Corps' federal
authority and activities. TRWDA shares the concerns of FDEP and environmental groups with respect to the environmental impacts of certain dredging and disposal practices which were utilized in the past. However, TRWDA is convinced there are practical solutions for the Corps to be able to resume its channel maintenance activities in a manner acceptable to FDEP and all affected parties. In any event, the Corps should exercise its federal statutory preemptive authority to maintain the channel for navigation. Aside from the direct interest of TRWDA and its members in navigation, we believe the Corps' provision of water flow sufficient to support navigation would also support industrial and municipal requirements, which are discussed further in Part 3 below. In addition, flows in the Chattahoochee and Apalachicola Rivers sufficient to support navigation will be beneficial to aquatic species and the natural resources of the Apalachicola River and Apalachicola Bay. A minimum flow of 5,000 cfs at Woodruff Dam has been established to benefit certain species protected under the ESA. However, 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. TRWDA believes flows sufficient to meet Middle and Lower Chattahoochee requirements would increase the

frequency of instances when flows below Woodruff Dam would exceed 5,000 cfs to benefit the Bay, particularly when combined with inflow contributions from the Flint River.

Comment ID: 55
Author Name: Brian Atkins
Organization:

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

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

and dredging should be authorized, regardless of how states feel, so that boat traffic and commerce can be allowed to utilize the river basins for transportation.

This is especially necessary since the railroad companies are not willing to work with shippers in that they have a monopoly for transport operations. I know water is essential for the population to drink, but adequate thought and restrictions as to new construction should be strictly enforced.

Comment ID: 190
Author Name: Charles Prestridge
Organization:

We just took a boat trip down the Chattahoochee from Walter F. George to Seminole. Thanks for operating the locks.

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

Consider additional reservoir down stream with the specific responsibility to maintain the water levels to support the needs of river shipping.

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

It is the Corps responsibility to operate the system as charged and to maintain the authorized navigational channel from Columbus to the Gulf of Mexico.

Comment ID: 587
Author Name: Robert Tant
Organization: Columbus Water Works

It is the Corps responsibility to operate the system as charged and to maintain the authorized navigational channel from Columbus to the Gulf of Mexico.

Comment ID: 730
Author Name: Carole Rutland
Organization: RiverWay South

It is extremely important for the ACF communities that water flow levels remain consistent and are controlled with a capacity to support river related activities at a sustainable level. We would support reasonable navigation which at the same time protects riverine resources and also allows boats to travel from Columbus to the Gulf and back again.

Comment ID: 770
Author Name: Walter Anderson
Organization: City of Berkeley Lake

Navigation is an important economic driver in this region. Increasing flow from Lake Lanier to compensate for a lack of river maintenance (e.g. dredging) is a short term solution for navigation at the expense of other regional values (e.g. drinking water, drought management, recreation). This tradeoff pits one region's needs against another region's needs as a function of lack of funding for the fundamental problem (lack of dredging). I would suggest that water flows from Lake Lanier NOT be used to compensate for a lack of maintenance of downstream facilities.

Do Not Support Navigation (Navigation)

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: 244
Author Name:

Organization:

The support of navigation on the Chattahoochee is ridiculous! During times of drought the barges should shut down. That's what we have trucks for. There are millions of people that depend on the storage of that water - compared to the interests of a VERY few barge owners. Barges can run when we get rain.

Comment ID: 268
Author Name: doug pauley
Organization:

I am glad to see that commercial navigation activities (incl dredging) have been suspended. I would like to see this activity removed as an authorized purpose

---

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

Dredging and shipping interests have created more avenues for the saline water to enter the Bay.

Comment ID: 778
Author Name: Philip Burton
Organization:

Navigation while in the early years may have been a viable option for the transportation of freight. It has become an impractical way to ship goods in today’s busy commerce and the needs for quick and timely delivery of goods with our roadways now available to better handle almost all of the consumer’s needs and being much more cost effective.

Comment ID: 810
Author Name: Tim Perkins
Organization: Forsyth County

Navigation on this section is no longer a high priority and may be altering the natural environment.

Environmental Impacts of Dredging (Navigation)

Comment ID: 26
Author Name: Donald Smiley
Organization:

and the other thing is, is the river, the channel in the river that was dredged out before when they used to dredge the river or maintain a barge channel in the river, all they used were snag boats and shallow-drafted barges, you know, but when they started pushing bigger barges and greater demand upstream for product, they began to use bigger and bigger barges, so they began to dredge a deeper and wider channel. When they started doing that, that's when the river begin to change, and that's all I have to say.

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: 736
Author Name: Carol Schwarz
Organization:

NO MORE DREDGING! The Florida river, Apalachicola has no demand for deep water navigation. The detriments to the environment vastly outway the benefits. NO DREDGING.

Comment ID: 810

Author Name: Tim Perkins
Organization: Forsyth County

Navigation on this section is no longer a high priority and may be altering the natural environment.