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Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals

Final Feasibility Report and Integrated Supplemental Environmental Impact Statement

Appendix F. Public Involvement (Attachments 1 -2)

ogan Martin Dam

Lay Dam

Walter Bouldin Dam

vvalter Bouldin Dam

Montgomery

R.F. Henry Lock and Dam

Millers Ferry Lock and Dam

Claiborne Lock and Dam

Dothan

Ĩ

La Grande

Albany

Fallahas

US Army Corps of Engineers®

Mobile District

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APPENDIX F

PUBLIC AND AGENCY INVOLVEMENT

APPENDIX F. PUBLIC AND AGENCY INVOLVEMENT

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F.1 ACR Scoping Report

The Scoping Report for the Allatoona-Coosa Reallocation (ACR) Study is provided as Attachment 1.

F.2 ACR Study – Public Notifications / Agency and Public Comments on Draft FR/SEIS and USACE Responses

F.2.1 Public Notifications

Information on the public notifications released in advance of the July-August 2019 Scoping Meetings for the ACR Study is presented in Section 2.0 of the Scoping Report (Attachment 1).

Availability of the Draft Feasibility Report/Supplemental Environmental Impact Statement (FR/SEIS) for agency and public review was publicized via a USACE Mobile District newsletter sent to the project mailing list by email or the U.S. Postal Service and posted on the USACE Mobile District web site; legal notices posted in five local newspapers in the project area; a press release issued by the USACE Mobile District; and a U.S. Environmental Protection Agency (USEPA) Notice of Availability (NOA) published in the *Federal Register*. All the above public notifications, except for the USEPA NOA, also included announcements of five public open house meeting in five cities in the project area to present information on the proposed project and receive public comments.

The public comment period on the Draft FR/SEIS was extended from December 29, 2019 to January 29, 2020, and public notification of the extension was provided via a USACE Mobile District press release; email to federal, state, and local agencies; and publication of an amended EPA NOA in the *Federal Register*.

Attachment 2 provides copies of the public notification documentation..

F.2.2 Release of Draft FR/SEIS for Agency and Public Review

USACE filed the Draft FR/SEIS with the USEPA on November 7, 2019. On November 15, 2019, the USEPA published an NOA of the Draft FR/EIS in the *Federal Register*, formally initiating the public review process and requesting comments on the Tentatively Selected Plan (TSP), the alternatives, and the adequacy of the supporting technical analysis. The draft revised Water Control Manuals (WCMs) (the Alabama-Coosa-Tallapoosa [ACT] River Basin Master Manual and three individual project WCMs) were included for public review as appendices to the Draft FR/SEIS. The NOA stated that the comment period would close on December 30, 2019.

During the comment period, the USACE Mobile District held public meetings at the following locations in the ACT River Basin on December 9–12, 2019 to share information about the project and to receive comments on the Draft FR/SEIS: Acworth, GA on December 9 – 51 attendees); Rome, GA (on December 10 – 22 attendees); Gadsden, AL (on December 11 – 38 attendees); and Childersburg, AL (on December 12 – 18 attendees). USACE advertised the time and place of the public meetings in local newspapers, by newsletter sent by U.S. mail and email, and on the USACE project website. Based on specific requests from agencies and various organizations, USACE subsequently extended the public comment period to January 29, 2020. The extension was announced via a USACE Mobile District press release, emails to members of the ACR project mailing list, and an amended USEPA NOA, published in the *Federal Register* on December 27, 2019.

F.2.3 Summary of Agency and Public Comments on Draft FR/SEIS

Agencies and members of the public made a total of 583 individual inquiries and/or comment submittals on the Draft FR/SEIS. USACE received submittals by email, U.S. mail, written comment forms at the public meetings,

and verbal comments to court reporters at the public meetings. All comment submittals received through February 12, 2020, were accepted and considered. Several agencies and organizations made inquiries to (1) formally request the comment period be extended beyond December 29, 2019, and/or (2) request that USACE provide copies of the Hydrologic Engineering Center-Reservoir Simulation (HEC-ResSim) and HEC-5Q model outputs for their review. The sources (and associated number) of inquiries and comment submittals were as follows: Native American tribes (3); federal agencies (4); congressional staff members (1); state agencies (5); local government agencies, boards, and authorities (17); non-government organizations (13); businesses (8); and interested individuals (532).

All inquiries and comment submittals were categorized by source, numbered, and recorded in a commentresponse matrix for those comments requiring individual responses. Comment submittals that raised more than one issue or concern were parsed into individual comments, and each one was assigned a category code based on the nature of the specific comment (e.g., National Environmental Policy Act [NEPA] process, modeling, biological resources, water quality, recreation, or flood risk). The categorization and grouping of similar individual comments facilitated the development of consistent USACE responses to similar issues and concerns.

This section provides a general overview of the principal comments and concerns raised by commenters on the Draft FR/SEIS.

Tribal Nations

All potentially affected federally recognized tribes were contacted and encouraged to review and comment on the Draft FR/SEIS. Three tribes responded: the Chickasaw Nation; Catawba Indian Nation; and Choctaw Nation of Oklahoma. They did not offer any specific comments or concerns. They either requested additional information and/or asked to be kept informed.

Federal Agencies

The U.S. Environmental Protection Agency (USEPA) expressed the following comments:

- Based on the tables in Section 4 of the Draft FR/SEIS, it is not clear how the alternatives were evaluated and ranked.
- The HEC-5Q model considered a wide range of flow conditions over a 7-year modeling period, but the HEC-ResSim model simulation appears to focus on median flow events.
- The Draft FR/SEIS does not adequately describe specific measures undertaken to address water conservation and efficiency.

The Southeastern Power Administration (SEPA) expressed the following concerns:

- The proposed reallocation of reservoir storage at Allatoona Lake appears to exceed the historic discretionary reallocation authority threshold for serious impacts (lesser of 50,000 acre-feet [ac-ft] or 15 percent of conservation storage).
- The water supply providers withdrawing water from Allatoona Lake have exceeded their existing storage allocations multiple times over the last 15 years. USACE has not quantified the associated impact on hydropower and indicated how that loss would be compensated.
- SEPA questioned multiple USACE assumptions in the baseline condition for the alternatives analysis.
- The proposed changes to Alabama Power Company (APC) operations at the Weiss and Logan Martin reservoir projects have potential to negatively impact the federal hydropower purpose at the USACE's Robert F. Henry Lock and Dam (L&D) and Millers Ferry L&D projects downstream on the Alabama River.

• The implementation timeline for the proposed changes is unclear because the Draft FR/SEIS identifies outstanding issues that still need to be addressed, including (1) potential requirements for APC to purchase additional flood easements at and/or below the Weiss and Logan Martin projects and (2) update of the Allatoona Lake shoreline management plan and implementation of measures to protect shoreline structures impacted by the proposed guide curve increase.

State Agencies

The Alabama Department of Economic and Community Affairs, Office of Water Resources (ALOWR) expressed the following comment and concerns:

- The Draft FR/SEIS has injected USACE into the long-running dispute between Alabama and Georgia over allocation of water in the ACT River Basin.
- USACE has no authority to reallocate storage at Allatoona Lake under the Water Supply Act of 1958 (WSA) (Public Law [P.L.] 85-500) without congressional approval. The Draft FR/SEIS does not explain how USACE has construed its authority under the WSA and determined that the reallocation would not "seriously affect" authorized project purposes or represent a "major … operational change."
- USACE must account for the total amount of storage space reallocated to water supply at Allatoona Lake, and the proposed reallocation is understated.
- USACE has not explained the assumptions made about future withdrawals and returns.
- The proposed reallocation would "seriously affect" other project purposes (specifically hydropower) and would involve a "major operational change."
- If the reallocation at Allatoona Lake would not be feasible absent the changes included in the 2015 Master WCM Update for the ACT River Basin, USACE should reconsider those changes as well.
- The Draft FR/SEIS is not consistent with NEPA because the No Action Alternative (NAA) (baseline condition) includes Cobb County-Marietta Water Authority (CCMWA) and Cartersville peak withdrawals in 2007, does not align with the PAA (Proposed Action Alternative) selected for the 2015 ACT Master Manual update, and does not cap withdrawals at the limit of the current water supply storage agreement.
- The TSP exacerbates (or at least does not remedy) existing water quality problems in violation of the Clean Water Act (CWA) (Title 33 of the United States Code [U.S.C.] § 1251 *et seq.*).
- ALOWR concurs with continued application of the current USACE storage accounting practice at Allatoona Lake rather than adopting Georgia's proposed methodology.

The Georgia Environmental Protection Division (GAEPD) expressed the following comments and concerns:

- USACE must select an alternative that uses Georgia's proposed storage accounting measures; the Draft FR/SEIS does not provide a reasonable explanation for its failure to select an alternative using Georgia's storage accounting methodology.
- USACE must grant Georgia's request to credit "made inflows;" encouraging credit for made inflows would reflect application of sound water management policy.
- The Draft FR/SEIS supports selecting Alternative 13, based on legal and policy rationale provided by the State of Georgia and the impacts analysis presented in the Draft FR/SEIS.
- Georgia concurs that USACE has the legal authority to reallocate storage to meet Georgia's 2050 demand under the WSA.
- The Draft FR/SEIS fails to adequately study proposed changes to APC projects. The draft FR/SEIS concedes that USACE has not fully considered several critical aspects of APC's proposal, including

reduction in flood storage at the Weiss and Logan Martin projects and potential flooding impacts downstream of these projects.

- The Draft FR/SEIS does not establish that APC's proposed changes comply with the requirements of the Coosa Power Act (P.L. 83-436).
- The Final FR/SEIS may proceed with the Allatoona Lake storage reallocation without APC's requested changes to flood operations at the Weiss and Logan Martin projects.
- The Final FR/SEIS may proceed with a reallocation of storage at Allatoona Lake entirely from conservation storage.
- GAEPD provided a series of technical comments on the Draft FR/SEIS, WCMs, HEC-ResSim modeling report, and hydropower analysis report.

Local Government Agencies, Boards, and Authorities

Attorneys for the *CCWMA* and the city of Cartersville, *GA* (the "Georgia Water Supply Providers" [WSPs])] provided the following comments:

- The WSPs support proposed reallocation of storage at Allatoona Lake and the use of the Georgia's proposed storage accounting methodology.
- The WSPs consider their request for storage reallocation to be a separate and independent action from the USACE proposal to increase the Allatoona Lake guide curve by 1 ft (summer pool) and by 1.5 ft (winter pool), referred to by the WSP as the "pool rise" feature; the WSPs maintain that the "pool rise" feature be evaluated as a discreet measure independent of the storage reallocation request.
- USACE should adopt Georgia's proposed storage accounting methodology to address specific fundamental flaws in the current USACE storage accounting practice.
- USACE should correct errors in the computation of the cost of the storage reallocation, addressing (1) computation of the updated cost of storage and (2) inclusion of additional costs associated with the "pool rise."
- USACE should specifically address the WSA's criteria regarding proposed water supply reallocations to demonstrate that the proposed Allatoona request would not represent "a major structural or operational change" or "seriously affect" authorized project purposes.
- USACE should more clearly define the criteria to classify environmental impacts as "negligible" or "measurable, but not appreciable" in the FR/SEIS.
- USACE should evaluate the proposal to modify flood operations at the APC Weiss and Logan Martin projects on the Coosa River independently from the proposed storage reallocation at Allatoona Lake; the WSPs request that the Allatoona reallocation request be addressed in a separate Record of Decision (ROD) from the APC proposed modified flood operations.

Representatives from several cities and counties located on or near the Coosa River reservoirs (in Alabama) affected by the TSP in the Draft FR/SEIS provided comments and/or passed resolutions either favoring or opposing the proposed changes to flood operations at Weiss and Logan Martin reservoirs included in the TSP. Representatives of *Cherokee County* commented in support of raising the winter pool level at Weiss Lake. Representatives of the *cities of Lincoln and Pell City* strongly supported raising the winter pool level at Logan Martin Lake associated with the proposed modified flood operations at the project. Representatives of the *Alabama cities of Gadsden, Glencoe, Hokes Bluff, Rainbow City, and Southside,* as well as the *Etowah County Chief Administrative Officer* expressed strong concerns specifically about potential adverse downstream impacts

on H. Neely Henry Lake associated with the proposed modified flood operations at Weiss Dam, as included in the TSP.

The *Water and Sewer Division of city of Rome, GA*, expressed concerns about the potential adverse effects in the Etowah River at Rome from the proposed changes in operations at Allatoona Dam included in the TSP.

Non-government organizations

Logan Martin Lake Protection Association representatives expressed strong support for raising the winter guide curve level for 460 ft to 462 ft at Logan Martin Lake and concerns about existing and potential for increases in future interbasin transfers for water supply purposes in the ACT River Basin in Georgia, including the downstream impacts on the Coosa River Basin.

The Anglers Unlimited Association supported raising the winter guide curve levels at both Weiss and Logan Martin lakes, citing improved water availability in the lakes during winter months to benefit the fishery, recreational access and boating safety, and other benefits.

The Lake Allatoona Association (LAA) offered the following comments:

- LAA opposed the proposed reallocation of reservoir storage for water supply due to potential adverse effects on reservoir pool levels and recreational use of Allatoona Lake.
- LAA advocated that the recreational value of Allatoona Dam and Lake has eclipsed its value for hydropower production.
- LAA recommended changes to project operations at Allatoona Dam to reduce hydropower production as necessary to maintain higher pool levels in the reservoir in support of recreational uses.

The *Coosa-Alabama River Improvement Association (CARIA)* expressed the following comments and concerns on the Draft FR/SEIS:

- CARIA supports raising the winter guide curve levels at the Weiss and Logan Martin projects, as this action would provide for improved recreational access and use, improved business and tourism around these projects, and increased property values,
- CARIA opposes the reallocation of reservoir storage at Allatoona Lake for water supply, as that action would reduce downstream flows and have adverse effects on water quality in the Coosa River in Alabama.
- The storage reallocation proposal at Allatoona Lake exceeds statutory authority under the WSA.
- CARIA concurs with the current USACE storage accounting practice instead of the storage accounting method proposed by the State of Georgia.
- CARIA is concerned about excess water supply withdrawals by WSPs at Allatoona Lake without close monitoring by USACE and without penalties/sanctions for overdrafting.
- USACE should limit the term of its water supply storage agreements or commit to formal periodic review of signed agreements.

The *Southern Environmental Law Center (SELC)* expressed the following comments and concerns on the Draft FR/SEIS:

• USACE HEC-5Q water quality modeling did not fully consider the best available information with respect to dissolved oxygen (DO) as more recent information is readily available from APC,

- The impacts of lower flows in Coosa River downstream of the Weiss and Logan Martin project between September and December each year on aquatic species are not sufficiently described and explained.
- The baseline condition for the ACR Study is not adequately described as it relies too much on the supporting NEPA documents prepared for the 2013 Federal Energy Regulatory Commission (FERC) relicense for the APC Coosa River projects, which were overturned by a court decision and remanded to FERC for reconsideration.
- The cumulative effects of the TSP on water quality in Weiss and Logan Martin lakes are not sufficiently discussed in the Draft FR/SEIS.

The Southeastern Federal Power Customers (SeFPC) expressed the following comments and concerns on the Draft FR/SEIS:

- USACE analyzed an improper baseline condition for comparison to the alternatives.
- There is insufficient authority in statue or regulation to support proposed storage reallocation at Allatoona Dam and Lake.
- The proposed storage reallocation at the Allatoona project constitutes a major operational change requiring congressional authorization.
- It is not appropriate to include non-federal reservoirs in the analysis to assess whether the TSP constitutes a major operational change.
- There are serious technical and procedural defects in the Hydropower Analysis report.
- SeFPC supports continuing the application of the USACE storage accounting practice versus adoption of the proposed Georgia storage accounting methodology.
- USACE needs to explain key differences between the 2010 ACT River Basin critical yield analysis and the 2019 update of that analysis,
- USACE needs to explain discrepancies in the Dependable Capacity Benefits presented for Allatoona Dam and Lake in the 2014 Final EIS for the ACT WCM Update and the 2019 ACR Draft FR/SEIS.

The *Neely Henry Lake Association (NHLA)* submitted a comment statement expressing concerns that proposed modifications to flood operations at Weiss Dam would result in increased flooding upstream of Minnesota Bend near Glencoe, AL, and increased evacuation (or reduction) of water levels in Neely Henry Lake downstream of Minnesota Bend. The comment statement addressed specific concerns about the potential environmental and economic effects of the proposed change in flood operations.

Greater Gadsden Area Tourism submitted a copy of the comment statement prepared by the NHLA to express their concurrence with the NHLA concerns.

Lake Martin Resource Association representatives expressed concern that proposed changes to reservoir operations in the Coosa River Basin, particularly the proposed reservoir storage reallocation for water supply at Allatoona Lake in Georgia, would have an adverse effect on Lake Martin and other APC reservoir operations in the Tallapoosa River Basin by requiring increased releases from those projects to meet established flow targets in the Alabama River near Montgomery.

Business Interests

The *Buck's Island and MarineONE Corporation* submitted a copy of the comment statement prepared by the NHLA to express their concurrence with the NHLA concerns. The company also described potential direct

impacts on their business interests and operations that might occur as a result of the proposed modified flood operations at Weiss Dam.

Alabama Power Company (APC) expressed the following comments and concerns:

- APC supports the proposed modified flood operations at the Weiss and Logan Martin projects.
- APC opposes the proposed increased water supply operations at Allatoona Lake and reiterates ongoing concerns with the 2015 ACT WCM update; these actions involve detrimental impacts to downstream interests in Alabama.
- APC asserts that it has met all the pertinent requirements of the Coosa Power Act regarding flood risk management,
- The Draft FR/SEIS highlights the reduction of flood storage at the Weiss and Logan Martin projects under the modified flood operation proposal but fails to acknowledge that operations at Weiss Lake have never exceeded the current flowage easement elevation of 572 ft; operations at Logan Martin Lake have exceeded elevation 473.5 only during the 1977 and 1979 flood events; the full surcharge elevations at both projects have never been used for flood operations,
- The USACE analysis shows that the proposed modified flood operations at the Weiss and Logan Martin projects reduce the number of structures impacted in all modeled events.
- APC is troubled by the statement in the Draft FR/SEIS that USACE will conduct additional analysis of impacts to private property both upstream and downstream of the Weiss and Logan Martin projects; APC believes it has satisfactorily addressed these questions and acquired all the necessary flowage easements.
- APC agrees with the USACE finding that the proposed modified flood operations would benefit recreation at the Weiss and Logan Martin projects.
- APC asserts that the proposed modified flood operations proposal for the Weiss and Logan Martin projects should not require EIS-level documentation; an Environmental Assessment (EA) for the modified flood operations, conducted separately from the Allatoona Lake water supply request, would be appropriate.
- APC expressed specific technical concerns about the USACE hydropower analysis of the alternatives.
- APC developed a historic properties management plan for the Coosa Rivers projects under the FERC relicensing process. Because of their significant cultural resource database, APC requests to be a consulting party in the development of a Programmatic Agreement (PA) on cultural resources between USACE and the Alabama Historical Commission regarding effects on the Weiss and Logan Martin projects stemming from the proposed modified flood operations.

Russell Lands, Inc. submitted comments expressing concern that proposed changes to reservoir operations in the Coosa River Basin, particularly the proposed reservoir storage reallocation for water supply at Allatoona Lake in Georgia, would have an adverse effect on Lake Martin and other APC reservoir operations in the Tallapoosa River Basin by requiring increased releases from those projects to meet established flow targets in the Alabama River near Montgomery, AL.

General public

Numerous commenters expressed support for raising the winter guide curve level at Weiss and Logan Martin lakes. Most of these commenters did not cite specific reasons for their support of this proposed change. Some commenters cited one or more benefits that they would expect as a result of the change (improved recreational access and use, aesthetic/visual benefits, regional economic and tourism benefits, increased property values, and so forth).

A few commenters expressed concern that raising the winter guide curve (reducing winter flood storage) at the Weiss and Logan Martin lakes would substantially raise pool levels during flood events beyond levels currently experienced, thus increasing damages to docks, boathouses, and other permitted facilities along the shoreline.

A few commenters expressed their desire for no change to APC project operations at Weiss and Logan Martin lakes.

About 180 residents and users of H. Neely Henry Lake individually submitted a standard comment statement prepared by the NHLA. The comment statement expressed concern that proposed modifications to flood operations at Weiss Dam would result in increased flooding upstream of Minnesota Bend near Glencoe, AL, and increased evacuation (or reduction) of water levels in Neely Henry Lake downstream of Minnesota Bend. The comment statement cited concerns about both the environmental and the economic effects of the proposed change in flood operations.

Several residents on Allatoona Lake provided comments opposing the TSP to raise the project guide curve (by 1 ft in summer and 1.5 ft in winter) as part of the Recommended Plan (RP) for water supply storage reallocation. They were concerned about the potential adverse effects of raising the summer pool to 841 ft on docks, boathouses, shoreline protection and other facilities permitted based upon a summer pool elevation of 840 ft as well as potential remedies for those effects.

F.2.4 USACE Responses to Agency and Public Comments

Table F-1 is a comment-response matrix for individual inquiries and comment submittals for the Draft ACR FR/SEIS. It includes columns for an assigned commenter identifying number, commenter's name and organization, the comment, and the USACE response. Commenter IDs comprise two parts: a letter indicating the source of the comment (B = business interests, C = congressional, F = federal, LG = local government, NGO = nongovernmental organization, P = public, S = state, and T = tribal) and a sequential number. The matrix includes all individual comments and inquiries that required a specific response. Attachment 3 provides all the inquiries and comment submittal documents addressed in Table F-1, as received by USACE (organized by Commenter ID No.).

A total of 191 emailed comments were submitted by residents, recreational users, and/or general supporters of the Logan Martin Dam and Lake project stating their support for raising the winter guide curve level at the lake from elevation 460 feet (ft) to 462 ft. These individuals all expressed the same position, each one in their own words, without offering any specific reasons for their support of this proposed operational change. The Commenter IDs and names of those individuals are provided in Table F-2. Other commenters who expressed support for raising the winter guide curve at Logan Martin Lake and cited one or more specific benefits associated with that action are included in Table F-1 with appropriate USACE responses.

A total of 180 residents, recreational users, and/or general supporters of the H. Neely Henry Dam and Lake project individually submitted comment forms presenting a three-paragraph list of concerns prepared by NHLA representatives. The Commenter IDs and names of those individuals are provided in Table F-3. A copy of the NHLA comment submittal (NGO-12) is included in the copies of comment submittals provided at the end of this appendix. The NHLA comments and USACE responses to NHLA concerns are provided at Commenter ID NGO-12 in the comment-response matrix (Table F-1). Along with NHLA representatives, several local government and business interests in the vicinity of H. Neely Henry Lake also submitted the NHLA-prepared comments (see Commenter IDs B-06, LG-03, LG-06, LG-07, LG-08, and NGO-08).

Table F-1.	Agency and	public comments or	the ACR Draft	FR/SEIS and U	SACE responses.
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Commenter			Comment	Comment		
	Commenter	Representing	Date	ID	Comment	
Tribal						
T-01	Autumn Gorrell, Historic Preservation Tech	Chickasaw Nation	11/19/2019	A	Our office received a letter regarding the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Water Control n Manuals. Thank you for the project notification. This project is outside of our area of interest at this time.	Thank you for your comment.
T-02	Wenonah G. Haire, Tribal Historic Preservation Officer	Catawba Indian Nation	12/16/2019	A	The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.	Thank you for your comments. T activities. Operational changes r characteristics, and slight change Martin lakes. If any Native Amer operational changes, USACE Mo
T-03	Lindsey Bilyeu, Senior Compliance Review Officer	Choctaw Nation of Oklahoma	12/23/2019	A	The Choctaw Nation of Oklahoma thanks the USACE, Mobile District, for the correspondence regarding the above referenced project. The Choctaw Nation Historic Preservation Department requests the GIS shapefiles of the project area so that we can determine if the project lies in our area of historic interest.	USACE Mobile District provided Weiss and Logan Martin WCM u Oklahoma via email on January
Federal						
F-01	Ashley Monroe	U.S. Environmental Protection Agency (USEPA), Region 4	12/12/2019	A	Could I please have the ACR Study HEC-ResSim Model Supporting Documentation?	The link to download the request received. The comment period v
F-02	Ntale Kajumba, NEPA Section, Acting Chief	USEPA Region 4	12/18/2019	A	I hope all is well. I am sending a follow-up email to our conversation regarding an extension request for the proposed project. I understand that the request would be sent along with others that previously requested a review extension. Is there any update from upper management? This would assist in our planning efforts since our associate reviewers and management will be on leave for the holidays.	Based on a December 18, 2019 notification, the public comment
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	A	The first concern for Southeastern is the proposed reallocation of storage to water supply. While Southeastern appreciates the Corps of Engineers' efforts of introducing additional project storage from the flood control pool to accommodate a portion of the supply request, the currently-proposed reallocation, plus the previously reallocated amounts of storage at Allatoona, appear to exceed the historic discretionary reallocation authority threshold for serious impacts of the lesser of 50,000 acre-feet or 15% of conservation storage. What will be the required approval process for this reallocation to take place?	The Water Supply Act requires the seriously affect the authorized pr U.S.C. § 390b(e)). The Assistant approve all other water reallocation seriously affect another authorized
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	В	With respect to the current water supply use, page 4-1, lines 19-20 indicates that current water supply users have exceeded their existing storage agreements on multiple occasions over the last 15 years. In terms of impacts to hydropower, the excess withdrawals during this period represented lost generation, as well as additional replacement power costs, since this period included numerous drought years. Will the final document include a quantification of impacts to hydropower during this period and the method by which hydropower will be compensated for the losses? Also, is there a projected effective date for the water storage contracts?	Alternative 1a is similar to the No Comparing the hydropower imparence exceeding their allocated storage of the losses due to water supply SEPA supplied a composite rever annual credit based on this meth Issuance of storage contracts wo 2021.
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	С	We also question the baseline that was selected to compare water demand impacts to the level of 2050 withdrawals. The selection of the most-extreme year 2006, as stated in the document on page 3-29, line 9 minimizes the perceived impacts of the increased future withdrawals. In addition, for clarification purposes, page 4-6, line 26 states that the NAA uses the 2007 water demands. Is this accurate?	The model simulations were usin reservoir projects in place over th year 2006 (not 2007), which was (page 4-6) in the main report has replicate historically observed da plans. The intent of the modeling representative demand to evaluat remain decreased over time, the
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	D	In Appendix D, Attachment 2 "Projected Impacts to Hydropower Report", it indicates the baseline of "Base2018" was selected, which represents the current condition with uncapped water withdrawals. By utilizing this as a baseline for comparison, it tends to minimize the real impacts the 2050 withdrawals will have on hydropower by inflating the reference point of comparison. We also question the Base2018 average energy listed for the federal projects, as well as some of the capacity capability numbers listed for Allatoona.	The Future without Project (FWC supply storage reallocation. Wat account sizes in the FWOP scen full effects of increased water wit Alternative 1 (Base2018) is the sis hydropower is marketed. Base20 operating rules and historic hydro which does not include excessive basis (base case) for evaluating Yes, annual generation appears has been verified with SEPA. Hy District Hydrology and Hydraulics Analysis Center (HAC) will review based experience.

The proposed action would not result in any direct ground-disturbing might cause minor changes to lake sedimentation and erosion les in erosion patterns might be observed downstream of Weiss and Logan rican artifacts and/or human remains are located as a result of these obile District will notify the Catawba Indian Nation.

GIS shapefiles of the Lake Allatoona water supply storage reallocation and update project area to Ms. Lindsey Bilyeu of the Choctaw Nation of 17, 2020.

ted information was provided to the requester shortly after the request was was subsequently extended to January 29, 2020.

press release issued by USACE Mobile District and subsequent email period was extended to January 29, 2020.

hat any reallocations that require major structural or operational changes or roject purposes may be made only upon the approval of Congress (43 nt Secretary of the Army for Civil Works (ASA (CW)) retains the ability to tions that do not require a structural or major operational change or ed project purpose.

o Action Alternative (NAA), but it does not allow for over-withdrawals. acts between these two alternatives would represent the effects of CCMWA e contracts. Results for BaseCap simulation alternative would be indicative y storage withdrawal exceedances.

enue rate of \$47.92 per megawatt-hour which represents lost revenue. An nod of computation for lost revenue maybe the method of compensation. ould be contingent on the ASA(CW). It would not take place before March

ng a 73-year hydrologic period of record assuming all USACE and APC he entire period plus current water withdrawals and returns (represented by s the year of highest water demand in the ACT River Basin. Section 4.4.1.1 s been corrected accordingly. The model simulations were not intended to ata but to provide a reasonable comparison of alternative water control g effort is not to maximize or minimize the impact, but to use a ate the overall impacts. There is no indication that the water demands will perfore it is reasonable to use the highest demand year for effects analysis.

OP) scenario is used to evaluate the hydropower impacts of the water ater supply withdrawals are limited to the current water supply storage nario. This limiting factor, which caps the withdrawals, aids in capturing the ithdrawals when compared to the increased reallocation scenarios. simulation name representative of current conditions under which 018 is used to establish the supportable capacity under the current rology. Supportable capacity for Alternative 2 (the FWOP alternative), we withdrawals for water supply and is slightly greater than Base2018, is the benefits of the RP.

to be lower when compared to observed generation. Marketable capacity ydropower plant performance parameters were determined by Mobile is Staff in collaboration with Project Operations Staff. The Hydropower w and consider annual generation and capacity capability from SEPA-

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F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	E	In addition to the direct effects of the reallocation at Allatoona, Southeastern also has some concerns regarding the changes proposed for the operation of the Alabama Power projects of Weiss Lake and Logan Martin Lake, as they have the potential to negatively impact the Federal Hydropower purpose. Southeastern markets power from the two Mobile District projects that are downstream on the Alabama River, R.F. Henry Lock and Dam (Henry) and Millers Ferry Lock and Dam (Millers). For Weiss Lake, the proposed reduced winter drawdown from elevation 558 ft. to elevation 561 ft. represents an annual reduction in flows in the river system during the low-flow fall months, which would have subsequently been available to provide generation benefits downstream at Henry and Millers. Also, the delay in the start of the seasonal drawdown of the summer pool at Weiss from August 31 to September 30 represents a shift in generation from a month of higher monetary value for the customers to a period of lower value. Likewise, for Logan Martin Lake, the proposed reduced winter drawdown from elevation 462 ft. also represents an annual reduction in river system flows during the low flow fall months, which would also reduce generation availability at Henry and Millers. Also, for both Weiss and Logan Martin, the raising of the winter guide curve would result in a lower volume of flood storage available for spring inflows. As a result, the projects may have to discharge more flow sooner, which may result in spilling or lost generation downstream at Henry and Millers (Ferry).	USACE has conducted a system These specific effects can be te- impacts below Logan Martin Dar "Alternative 11 is expected to ha confluence of the Coosa and Ta outputs addressing conditions u Woodruff Lake were reviewed to From a hydropower perspective Operations Alternatives) (in Atta energy at Robert F. Henry L&D APC Weiss and Logan Martin P River Basin hydropower projects Table 4-3 (Individual Plant Depe Operations Alternatives) (also in capacity in the May-September proposed change in operations energy and capacity occurs at to operations.
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	F	With respect to the proposed changes in maximum surcharge levels at Weiss (a reduction of 2 ft. from 574 ft. to 572 ft.), and at Logan Martin (a reduction of 3.5 ft. from 477 ft. to 473.5 ft.), and the corresponding changes to the flood release regulation schedules, these changes would tend to increase the volume of flow in the river sconer during high inflow events due to the reduced flood storage and increased release schedules at the projects. This may ultimately result in additional spilling and lost generation benefits downstream at Henry and Millers (Ferry).	Table 3-5 (Individual Plant and A Attachment 2 in Appendix D of t and Millers Ferry L&D as a resu Projects. As noted, model simul- projects. Table 4-3 (Individual Plant Depe Operations Alternatives) (also in capacity in the May-September proposed change in operations energy and capacity occurs at th operations. The potential lost generation cap events is caused by minimum of indicate an increase in the durat operation at Weiss and Logan M
F-03	Herbert Nadler, Assistant Administrator for Power Resources	Southeastern Power Administration (SEPA)	1/7/2020	G	From an implementation perspective, the timeline is unclear since there seems to be a number of outstanding issues identified in the document that still need to be completed. The document indicates that the Corps of Engineers will conduct additional analysis of flood impacts to private property upstream and downstream of Weiss and Logan Martin. Then it indicates that Alabama Power may be required to purchase any additional identified real interests as part of the proposed plan. Then the document indicates that a modification to the Alabama Power FERC License would be required, and that the Corps of Engineers and Alabama Power would have to enter into an MOA. It also states that, due to the summer pool rise at Allatoona, the shoreline management plan will need updating; also, that riprap work, dock work, and beach work would be required. The question we have is, "What is the projected timeline for the completion of these tasks, and is implementation of the Tentatively Selected Plan contingent on the completion of these tasks?"	Issuance of storage contracts w 2021. The WCMs will also not b in the Appendix D of the FR/SEI
F-04	Mark Fite, Director, Strategic Programs Office	U.S. Environmental Protection Agency (USEPA), Region 4	1/29/2020	A	Based on the tables that provide an overview of the alternatives analysis, it is unclear how the alternatives were ranked and evaluated.	Alternatives were evaluated acro team (PDT) selected the alterna purposes and met the planning
F-04	Mark Fite, Director, Strategic Programs Office	U.S. Environmental Protection Agency (USEPA), Region 4	1/29/2020	В	Eleven alternatives were evaluated using various models for water resources: HEC-ResSim, HEC-5Q and HEC-RAS modeling. The HEC-5Q water quality model was adjusted to include high flow and low flow drought conditions over a 7-year modeling period. However, HEC-ResSim does not appear to incorporate such an adjustment. The HEC-ResSim model simulations that were used for the alternatives analysis appear to focus on median flow, which excludes the more infrequent high or low flow events. It is important to evaluate the frequency of low flow events (e.g. maximum number of consecutive days <365 cubic feet per second by month during drought years) in order to determine the effect on stream flow conditions and drought operations.	The ACT HEC-ResSim model s record (1939–2012) which incluse FR/SEIS main report and Apper entire range of flow conditions, it documentation is not limited to re plots and tables depicting 90 pe are compared among alternative monthly 7Q10 values in the Cord 17 compares modeled flow cond 2009, which is the period of the between the NAA and the RP (at the last sentence and example, than 350 to 365 cubic feet per s continuous minimum discharge plus leakage at the dam is about

m-wide analysis and captured the effect of the APC changes to all projects. eased out be comparing Alternative 2 and Alternative 9. Specific flow am from Alternative 11, the RP, are discussed in Section 5.1.2.2: ave a negligible overall effect on flow conditions in the Alabama River at the allapoosa rivers and further downstream of Montgomery, AL. HEC-ResSim under Alternative 11 and the NAA for R.F. Henry L&D /Robert "Bob" o confirm this conclusion."

e, Table 3-5 (Individual Plant and ACT System Energy – Modified Flood achment 2 in Appendix D of the ACR FR/SEIS) does show a decrease in and Millers Ferry L&D as a result of proposed change in operations at the Projects. As noted, model simulation does understate energy from the ACT ts.

endable Capacity – Modified Flood Operations Alternatives– Modified Flood n Attachment 2 in Appendix D of the ACR FR/SEIS) shows an increase in time frame at the Robert F. Henry and Millers Ferry projects as a result of at the APC Weiss and Logan Martin projects. A net gain in the sum of both the aggregated federal Projects as a result of the proposed modified flood

ACT System Energy – Modified Flood Operations Alternatives) (in the ACR FR/SEIS) does show a decrease in energy at Robert F. Henry L&D ult of proposed change in operations at the APC Weiss and Logan Martin lation does understate energy from the ACT River Basin hydropower

endable Capacity – Modified Flood Operations Alternatives– Modified Flood n Attachment 2 in Appendix D of the ACR FR/SEIS) shows an increase in time frame at the Robert F. Henry and Millers Ferry projects as a result of at the APC Weiss and Logan Martin projects. A net gain in the sum of both the aggregated federal Projects as a result of the proposed modified flood

apability at the Robert F. Henry and Millers Ferry projects during high-flow operating head, high tailwater. Analysis of the modeling output does not tion of minimum operating head resulting from the change in surcharge Martin dams.

vould be contingent on the ASA(CW). It would not take place before March be signed prior to March of 2021. The additional impacts analysis is detailed IS.

ross an array of metrics. Alternatives were not ranked. The project delivery ative that provided for a balanced operation to meet the authorized project objectives

simulates project operations in the basin over a 73-year hydrologic period of udes the highest high and lowest low-flow conditions over that period. The ndix E include detailed evaluation and comparison of alternatives under the including particular focus on low-flow drought conditions. The median flow conditions at multiple points in the basin but includes numerous ercent exceedance plots and flow-duration curves where low-flow conditions res. Table 5-6 in the main report compares the percent exceedance of osa River near Rome for the NAA and Alternative 11 (the RP) and Figure 5iditions for the NAA and Alternative 11 from January 2007 to December of drought of record in the basin. In all cases, the changes in flow conditions and the other alternatives considered) are minor to negligible. In regard to there are no days in which the flows downstream of Allatoona Dam are less second (cfs). As required by the project authorization, the dam provides a (ranging from 200 to 230 cfs) from a small service generator in the dam, ut 150 cfs.

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F-04	Mark Fite, Director, Strategic Programs Office	U.S. Environmental Protection Agency (USEPA), Region 4	1/29/2020	С	The EPA appreciates the State of Georgia's reduction in demand from 124-148 mgd to 94 mgd based on updated population projections and implementation of conservation and efficiency. However, the Draft FR/SEIS does not specify the specific actions taken to conserve water resources and improve the efficiency of the system. This information would help the public understand whether all conservation and efficiency measures (i.e., EPA Best Practices to Consider When Evaluating Water Conservation and Efficiency, 2016) have been addressed. For example, the Draft FR/SEIS does not discuss the reason for the increased leakage from Allatoona Dam. Leakage from Units 1 and 2 increased from 75 cubic feet per second (cfs) to 150 cfs, but the Draft FR/SEIS does not include a reason for the increase.	Conservation and efficiency ass state, the Metropolitan North Ge providers. However, USACE has storage reallocation request is b being undertaken by these parti E.1.1.8) devote a substantial an undertaken in the basin in both so forth. The comment also sug conservation or efficiency issue of the ACT River Basin for this so more accurately reflect current losses (leakage) in municipal ar reality in large dams, particularl large dams can be managed, in eliminate it is not justifiable. In system, as it incidentally contrit Etowah River downstream of th
F-04	Mark Fite, Director, Strategic Programs Office	U.S. Environmental Protection Agency (USEPA), Region 4	1/29/2020	D	U.S. Fish & Wildlife Service (FWS) has been actively engaged in the WCM and the proposed project. They have submitted comments to the USACE regarding the protection of threatened and endangered species within the ACT Basin.	The RP has completed informal compliance with Section 7 of the report and Appendix F (Section
Congression	al					
C-01	John Wallace, Field Representative	Georgia 11th Congressional District (Loudermilk)	12/9/2019	A	I have been assured that these changes would not lower the Lake Allatoona levels.	Compared to the NAA (represent levels at Allatoona Lake or a slip increase up to 1 ft higher.
C-01	John Wallace, Field Representative	Georgia 11th Congressional District (Loudermilk)	12/9/2019	В	I really enjoy working with the local Lake Allatoona USACE rangers and staff.	Thank you for the comment.
State		1				
S-01	Hailian Liang	Georgia Environmental Protection Division	11/15/2019	A	 I am writing to request for following models and documentations associated with above Draft FR/SEIS and Allatoona-Coosa Reallocation Study: ACR Study HEC-ResSim Model and Supporting Documentation ACR Study HEC-5Q Water Quality Model and Supporting Documentation. Given the limited time available for review and comments, it is crucial that we can obtain those models and supporting documentations as soon as they are available so that we could conduct our review in a timely manner. 	The link to download the reques 2019. An additional link was pr
S-02	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	11/18/2019	A	Can you please send the link to download the model and data files related to the ACT Draft Feasibility and Integrated Supplemental Environmental Impact Statement?	The link to download the request the comment period was subse
S-03	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	11/22/2019	A	The State of Alabama, through its Office of Water Resources, respectfully requests a 60-day extension, through March 2, 2020, to offer comments on the Corps' Draft Feasibility Report and Supplemental Environmental Impact Statement (Draft FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin. Alabama requests this extension for two reasons. First, the Corps has granted a substantial allocation from Allatoona Lake, and Alabama will need sufficient time to conduct its analysis of the background data and ResSim reservoir simulation model, which we have separately requested from the Corps. Second, the Corps has issued the Draft FR/SEIS shortly before Thanksgiving and has set a due date for comments shortly after Christmas. In light of the magnitude of this decision, it will be impracticable to submit comments during the holidays. Thank you for your consideration.	Based on a December 18, 2019 notification, the public comment
S-04	Richard E. Dunn, Director	Georgia Environmental Protection Division (GAEPD)	12/13/2019	A	In response to the Federal Register Notice of November 15, 2019, "Environmental Impact Statements; Notice of Availability," 84 Fed. Reg. 62,530, the State of Georgia requests that the U.S. Army Corps of Engineers ("Corps") extend the period designated for public comments. Specifically, the State respectfully requests that the review period be extended by 30 days from December 30, 2019 until January 29, 2020. The Draft EIS addresses two requests—a request from the State of Georgia to reallocate storage space in Allatoona Lake to address Georgia's anticipated 2050 water supply needs; and a request from Alabama Power Company to modify flood operations at Weiss Lake and Logan Martin Lake. As the proponent of one of the requests, the State has a strong and concrete interest in the Draft EIS and, particularly, in the Corps' response to Georgia's request. The Corps' response will affect almost one-million Georgia citizens who rely on Allatoona Lake for water supply.	Based on a December 18, 2019 notification, the public comment

sociated with water supply demands in Georgia are the responsibility of the eorgia Water Planning District (MNGWPD), and the individual water as looked closely at the water demand estimates upon which the reservoir based to ensure that reasonable conservation and efficiency measures are ties. The FR/SEIS main report and Appendix E (Sections E.1.1.6 and mount of documentation to water conservation and efficiency measures states associated with water supply demands, drought management, and ggests that "leakage" at Allatoona Dam represents a potential water e. The leakage value at Allatoona Dam, as applied in the model simulations study, is an estimated value that was increased in the model updates to conditions. The leakage at Allatoona Dam is not comparable to water

nd industrial water supply distribution systems. Leakage is an inherent ly in older structures (Allatoona Dam is over 70 years old). While leakage in n most cases, either it cannot be physically eliminated or the cost to addition, the leakage at the dam does not represent a loss to the natural butes to minimum flow values and supports the aquatic environment in the ne dam.

Il consultation with the U.S. Fish and Wildlife Service (USFWS) and is in full the Endangered Species Act. See Section 7.3.1.3 of the Final FR/SEIS main in F-3).

enting current conditions), the RP would result in either no change to pool ight increase from December through July, ranging from a negligible

sted information was provided to the requester on November 21 and 27, rovided on December 30, 2019 in response to a follow-up request.

sted information was provided to the requester shortly after the request, and equently extended from December 29, 2019 to January 29, 2020.

9 press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

P press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

Commenter	Commenter	Representing	Comment Date	Comment	Comment	
S-04	Richard E. Dunn, Director	GAEPD	12/13/2019	В	Of particular concern to the State—and the primary reason for requesting an extension—is that the State has found an error in the Corps' HEC-ResSim modeling that affects every model run in the Draft EIS containing Georgia's storage accounting. The effects of this error are pervasive and working through the ramifications will take the State some time. Compounding the State's need for additional time, the State did not receive all of the requested models from the Corps until November 22, 2019, a full week into the existing 45-day comment period. It is critical that the State have adequate time to review and understand the models and the effects of the error prior to submitting comments on the Draft EIS.	The minor error in the model we updated to reflect the revised m model outputs and no overall c
S-04	Richard E. Dunn, Director	GAEPD	12/13/2019	С	In similar situations, the Corps has routinely granted extensions to comment periods for Draft and Final EIS. For example, in the updates to the Alabama-Coosa-Tallapoosa ("ACT") Water Control Manual, the Corps published the Draft EIS with an original comment deadline of May 1, 2013. In response to requests for extensions, the Corps extended the comment period by 30-days to May 31, 2013. Similarly, when the Corps published the Final EIS for the ACT Water Control Manual, the original comment deadline was December 8, 2014. Subsequently, and again in response to requests for extension, the Corps extended the comment period by almost 70-days to February 15, 2015. Considering the State's unique interest in the Draft EIS, the modeling error found by the State, the Corps' delay in providing copies of the models on which the Draft EIS is based, and the State's strong interest in reviewing and correcting the same, the State respectfully requests that the comment period be extended until January 29, 2020. The State appreciates your attention to this matter. Please contact me if we can be of assistance.	Based on a December 18, 2019 notification, the public commen
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	A	II. The Corps Must Select an Alternative that Uses Georgia's Proposed Storage Accounting Measures. As part of its 2018 Water Supply Request, the State of Georgia asked the Corps to adopt Georgia's storage accounting methodology for determining the amount of storage available under existing and future water supply contracts at Allatoona Lake. Georgia made four specific requests. First, Georgia requested that the Corps honor the State's existing allocation of "made inflows" to the Cobb County-Marietta Water Authority ("Cobb-Marietta") as reflected in EPD Permit No. 008-1491-05 (Modified Nov. 7, 2014) ("Cobb-Marietta Permit"). The Cobb-Marietta Permit grants Cobb-Marietta the exclusive right to impound water released from Hickory Log Creek Reservoir and certain return flows in Cobb-Marietta's existing storage space in Allatoona Lake. Second, the State requested that the Corps credit made inflows, the State next asked the Corps to provide a detailed and reasoned explanation for its decision. Finally, Georgia requested that the Corps adopt additional storage accounting measures related to determinations of when storage accounts are full and how the Corps allocates natural inflows when the Allatoona rule curve is not at full summer pool. In the Draft SEIS, the Corps failed to adopt an alternative utilizing Georgia's storage accounting and failed to provide a detailed and reasoned explanation for its decision.	USACE has carefully considered current USACE storage account Georgia in its water supply required ability of water supply users to Allatoona Lake. The analysis is needs could be met using either to the operation of Allatoona La human environment. The RP in including current and past prac- have allocated storage based of accounting methodology credits USACE storage account, ensuing water supply storage. By allocated the greatest likelihood that thos amount and accounting method that would result from accommon supply users to make full use of
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	В	 A. The Corps Must Grant Georgia's Request to Credit Made Inflows. I. The Corps is Legally Required to Defer to Georgia's Existing Allocation of Water Rights. The Corps has long recognized that the purpose of allocating water supply storage in a reservoir is to provide storage space and not to allocate water. The Corps consistent and long-stated policy has been that the Corps contracts for storage space in a reservoir, but a state must provide water rights to a user. Because the Corps does not allocate water rights, it must defer to states like Georgia—that do. The State has exercised this authority by allocating return flows created by or for Cobb-Marietta in Allatoona Lake to Cobb-Marietta hrough the Cobb-Marietta Permit. Legally, the Corps must recognize and account for Georgia's allocation to Cobb-Marietta made pursuant to the Made Inflow Rule and consistent with the principles of state sovereignty. The Corps' treatment of return flows in the Draft SEIS does the opposite. It intrudes on Georgia's right to allocate water within its borders because the TSP ignores Georgia's existing allocation of its water resources. The Cobb-Marietta Permit allocates all return flows made by or for Cobb-Marietta into Allatoona Lake to Cobb-Marietta to impound and store provided the total volume of water held in its storage does not exceed 12,485 acre-feet of water. Under the TSP, however, the Corps' storage accounting would allocate all return flows made by or for Cobb-Marietta is currently contracted storage occupies 4.61% of the reservoir conservation storage, the storage accounting would allocate all understanding of Cobb-Marietta's Permit, the Corps has a different legal understanding of Cobb-Marietta and allocate those flows to other reservoir users, thus infringing on Cobb-Marietta's legal right to that water. If the Corps selects the TSP in its Record of Decision, the Corps will be (1) allocating water rights in contravention of lecades of Corps policy, and (2) disr	See response to S-05, Comme

vas corrected and the model simulation rerun. The Final FR/SEIS has been model results. The revisions resulted in minor to negligible changes in the change to the RP.

19 press release issued by USACE Mobile District and subsequent email nt period was extended to January 29, 2020.

red Georgia's proposed storage accounting method, but the RP retains the unting method. The RP would fully meet the water supply needs identified by quest, and, therefore, does not conflict with Georgia law with respect to the or meet their state-permitted withdrawal needs from storage allocated in set forth in the Draft FR/SEIS indicated that the Georgia users' water supply her storage accounting methodology, without requiring any significant changes ake and without significantly affecting other authorized purposes or the includes the USACE accounting methodology for a variety of reasons, actice at Allatoona Lake, where existing water supply storage agreements on the USACE methodology for estimating yield. The current storage its basin inflow to all users but charges the winter drawdown solely to the uring that this annual drawdown does not reduce the yield of the allocated cating an amount of storage that is expected to provide sufficient yield to meeds even in the event of severe drought, the USACE methodology provides base needs will, in fact, be met. For this reason, USACE considers the storage obology in the RP to most accurately reflect the overall water supply benefit modating Georgia's water supply request, while also enabling Georgia water of their withdrawal rights as permitted by the State.

nt A.

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S-05	Richard E. Dunn,	GAEPD	1/29/2020	C	2. Encouraging made inflows reflects sound water management policy.	See response to S-05, Comment A.													
	Director				Aside from the legal requirement that the Corps recognize Georgia's existing allocation of its water resources, utilizing a storage accounting methodology that credits made inflows is sound water policy. Georgia's state-wide water plan favors and incentivizes made inflows as a form of water reuse and efficient use of the State's water resources. Creating made inflows can be costly for a user, but users—like Cobb-Marietta—spend this money because they see the benefit in creating flows that would not otherwise exist. As discussed above, in Georgia, one of the greatest benefits is that the State can, under specific circumstances, allocate those made inflows to the user that created them. The storage accounting methodology selected in the TSP, however, results in the reverse incentive. If users receive only a small percentage of credit for made inflows, then that lessens the incentive for users to build storage projects like Hickory Log Creek, construct water reclamation facilities, and otherwise engage in management practices that increase the sustainability of water supplies. Made inflows to a reservoir increase the yield of the reservoir by reducing net withdrawals, thereby keeping reservoir levels higher and mitigating any impact of water supply source for the future. Georgia's storage accounting methodology does precisely that and should be adopted in the Final SEIS. If the Corps chooses otherwise, Georgia requests that the Final SEIS address why the Corps does not want to incentivize return flows to Allatoona Lake.														
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	D	 B. The Draft SEIS Does Not Provide a Reasonable Explanation for its Failure to Adopt an Alternative Using Georgia's Storage Accounting Methodology. The Draft SEIS provides two—or maybe three reasons why the Corps did not choose an alternative with Georgia's storage accounting as the TSP: (1) Georgia's storage accounting methodology may or may not be consistent with current law; (2) the Corps can only implement Georgia's storage accounting methodology after or if a pending rule is promulgated; and (3) Georgia's methodology is not consistent with South Atlantic Division ("SAD") storage accounting. 	See response to S-05, Comment A.													
																		To begin, Georgia's storage accounting is consistent with current law. The Corps acknowledges that all federal action alternatives considered in the Draft SEIS, including those alternatives that utilize Georgia's storage accounting methodology, "can be implemented under current law."	
					Second, the Draft SEIS notes a pending national rule that will address some, but not all, of the storage accounting issues raised as part of Georgia's Water Supply Request. See 2016 Notice of Proposed Rulemaking, U.S. Army Corps of Engineers, Use of U.S. Army Corps of Engineers Reservoir Projects for Domestic, Municipal & Industrial Water Supply, 81 Fed. Reg. 91556 (Dec. 16, 2016) (the "Water Supply Rule"). The Draft SEIS states that implementing "an alternative that utilizes the State of Georgia's recommended storage accounting methodology would be contingent upon a final decision" on the Water Supply Rule. See Draft SEIS at 4-18, lines 30-32. On January 21, 2020, however, the Corps announced that it was withdrawing the Water Supply Rule with no stated intention of issuing a new national rule at any point in the future. Therefore, the now-withdrawn Water Supply Rule does not prevent the Corps from adopting Georgia's storage accounting methodology is inconsistent with SAD's storage.														
					accounting. See Draft SEIS at 4-18, lines 28-29. However, Georgia is not aware of any formal written SAD storage accounting policy setting consistent storage accounting procedures for all Corps Districts within the SAD, and the Draft SEIS cites no such policy document. Therefore, the Final SEIS must either select an alternative utilizing Georgia's storage accounting methodology or provide a reasoned explanation for why it does not.														
S-05	Richard E. Dunn,	GAEPD	1/29/2020	E	C. The Draft SEIS Supports Selecting Alternative 13.	See response to S-05, Comment D.													
	Director				In addition to the legal and policy reasons discussed above, the impacts analysis in the Draft SEIS supports selecting an alternative using Georgia's proposed storage accounting. The Draft SEIS demonstrates that Alternative 133 has the most beneficial and least negative impacts of all alternatives, including the TSP. See EPD Tech Memo at pp. 5-18. Alternative 13 and the TSP are identical except for the selected storage accounting methodology—the TSP uses the Corps' current storage accounting and Alternative 13 uses Georgia's proposed storage accounting. While NEPA proscribes a process and not an outcome, the Corps may not arbitrarily choose an alternative. The Corps is legally required "to examine the relevant data and articulate a satisfactory explanation for its action including a 'rational connection between the facts found and the choice made." Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 42-43 (1983). Here, the Draft SEIS does not explain why the Corps choose the TSP over Alternative 13, objectively the best alternative. Georgia requests that the Final SEIS and ROD select Alternative 13 instead of the TSP. If the Corps did not choose the most beneficial and least negative alternative.														

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ID	Commenter	Representing	Date	ID	Comment	
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	F	 III. The Draft SEIS Model of the Future Without Project Alternative Does Not Reflect the Reality of the ACT Basin in the Absence of a Storage Reallocation. Unlike many Environmental Impact Statements, the Draft SEIS contains both a No Action Alternative ("NAA") and a Future without Project ("FWOP") Alternative. Having both alternatives in the Draft SEIS is useful: the NAA provides the Corps a current model of the ACT Basin in 2050 in the absence of a reallocation. Because all the action alternatives are 2050-looking, comparing the action alternatives to the FWOP provides the Corps critical information that is otherwise masked in an NAA comparison. That is, a comparison between the action alternatives and the NAA provides the Corps information on the impacts resulting from the State's requested reallocation and the impacts associated with an increase in water supply demand between current and 2050. That increased demand exists regardless of a reallocation and necessarily has associated impacts. A comparison between the action alternatives and the FWOP allows the Corps to distill the impacts of just the State's requested reallocation because both the FWOP and the action alternatives have the same 2050 demand. Because the FWOP provides such valuable information, the Final SEIS must model it correctly. With respect to the first assumption that Georgia would allow massive water shortages to take place the Draft SEIS sinclude a discussion of the impacts of the water shortages. The consequences would be catastrophic, and Georgia would not let this happen. Based on those consequences, Georgia maintains that the Final SEIS should re-designate the "adverse" impact to a "substantially adverse" impact. This leads to the second false assumption—that in the absence of a federal reallocation, Georgia would not pull water from elsewhere in the Georgia portion of the ACT Basin an assumption undermined by the Draft SEIS. The Draft SEIS evaluates nine non-federal water supply options as potenti	The EIS used the FWOP altern financial costs of the reallocation alternative-to-alternative compu- shortages would occur or the withe next least costly most likely non-federal alternatives do not therefore, they have been addura alternatives is not the scope or
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	G	 IV. The Corps has the Legal Authority to Reallocate Storage to Meet Georgia's 2050 Demand under the Water Supply Act. The Water Supply Act of 1958 provides the Corps with legal authority to reallocate storage in federal reservoirs for the benefit of municipal and industrial water supply. 43 U.S.C. §390b. The Corps may reallocate storage so long as the reallocation will not "seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed," or "involve major structural or operational change." 43 U.S.C. §390b(e). Georgia believes the Draft SEIS evidences that the Corps has the requisite legal authority under the Water Supply Act to grant Georgia's Request. Georgia therefore, requests that the Final SEIS include an additional and specific discussion of the COrps' Water Supply Act legal authority. Allatoona Lake has seven federally authorized purposes: flood risk management, hydropower, navigation, recreation, water supply, water quality, and fish and wildlife. Draft SEIS at Table 2-2 at 2-4. Table 4-6 of the Draft SEIS contains a comparison of the NAA, FWOP, and nine action alternatives across four of these purposes: hydropower, flood risk, navigation, and recreation. Draft SEIS at 4-19. A review of this chart as a whole demonstrates that none of the action alternatives cause a major operational change to a serious effect on any of the four project purposes evaluated. By way of example, as compared to the NAA, the hydropower capacity value of the TSP is nearly identical—\$265.80 million under the TSP. Id. Similarly, if there is a flood equivalent to the 1979 flood, there would be, under modeled worst-case conditions, only a .6% increase in the dollar value of flood impact damages attributable to changes at Allatoona Lake between the NAA and TSP. See id., Draft SEIS at Table 4-8 at 4-21. The percent of time a seven-and-a-half-foot navigational channel will be available is nearly identical between the NAA (85.9%) and the TSP (85.1%). Id at Table 4-6. Fin	USACE agrees that before add discretionary authority under th or operational change or seriou prior to adopting any alternative conclusions. However, USACE notes that th on authorized purposes, and of analysis in the Draft FR/SEIS in (or beneficial).

rnative to evaluate the effects of the reallocation as well as identify the tion. The appendices contain all the information necessary to identify specific parisons. Part of the FWOP condition assumptions include that either water supply need would be met from another source. That is the basis for ely alternative. The details provided by the State of Georgia with respect to the ot provide enough detail for those alternatives to be modeled in HEC-ResSim; dressed qualitatively. Assessing the impacts of non-federal water supply or intent of this study.

lopting the RP or any other alternative involving an exercise of its the WSA, it must document that such action would not involve major structural busly affect any authorized purpose. USACE will complete that legal analysis ve in the final EIS and will document in the ROD, as appropriate, any relevant

the Draft FR/SEIS did extensively document the operational changes, impacts other effects of each alternative. In virtually all relevant categories, the indicates that the effects would be no more than negligible or slightly adverse

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Н	 V. The Draft SEIS Overestimates the Projected Cost of Storage. Engineering Regulation 1105-2-100 (April 22, 2000) governs how the Corps calculates the cost of reallocated storage. Under that Engineering Regulation, the Corps must generally consider four pricing methods benefits foregone, revenues foregone, replacement costs, and updated cost of storage and then choose the method yielding the highest cost. ER 1105-2-100 at E-216-17. Table 7-3 includes a summary of the storage costs associated with each of the four options for the Allatoona Lake storage reallocation. Draft SEIS at 7-19. Based on the numbers, the Draft SEIS chooses to calculate the cost of the Allatoona Lake storage based on the "updated cost of storage" method. Id. Using this method, the Draft SEIS determines that the cost of reallocating storage from Allatoona Lake is \$21,968,000. Georgia maintains this number is incorrect and the actual cost of the storage should be substantially lower. As a result, Georgia requests that the Corps re-evaluate its "updated cost of storage" calculation and include the corrected number in the Final SEIS. Georgia requests that the Corps remove the (1) half-million-dollar cost—an infrastructure cost attributable to recreational facilities— and (2) thirty-six million-dollar cost—an infrastructure cost attributable to hydropower from the "updated cost of storage calculation" in the Final SEIS and subsequent water supply contract. To determine the "midpoint of construction," the Corps must determine the midpoint between "the start of the month when lands for the project were first acquired or on the date when the first construction contract was awarded whichever was earlier" and "the end of the government FY in which final deliberate impoundment of the reservoir pool was initiated." Id. Thus, the start date for determining the "midpoint of construction" is, at the earliest, 1941 (when the Corps began acquiring land). The end date—the final impoundment of the pool—is either 1	The updated cost of storage has address the midpoint of constru Section 7.6.4 of the Final FR/SE
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	I	VI. The Draft SEIS Fails to Adequately Study Proposed Changes to Alabama Power Projects. In addition to Georgia's Water Supply Request, the Draft SEIS includes a request by APC to lower the established maximum surcharge levels and reduce winter drawdown levels at Weiss Lake and Logan Martin Lake. For Weiss Lake, APC proposes lowering the maximum surcharge elevation from 574 feet to 572 feet and raising the winter drawdown elevation from 558 feet to 561 feet. See Draft SEIS at xxii, lines 14-16. For Logan Martin Lake, APC proposes lowering the maximum surcharge elevation from 477 feet to 473.5 feet and raising the winter drawdown elevation from 460 feet to 462 feet. See Draft SEIS at xxii, lines 16-18. APC's requested changes would result in a substantial reduction in available flood storage that the Draft SEIS has not fully legally or factually analyzed as required by NEPA and by Public Law 83-436, the statute authorizing private development of power projects on the Coosa River. See Draft SEIS, Table 4-2 at 4-11.	See the response to S-05, Com
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	J	 A. NEPA Requires a Full Study of Potential Impacts Prior to Selecting a Proposed Alternative. NEPA requires all reasonable alternatives be rigorously explored and objectively evaluated. 40 C.F.R. § 1502.14(a); see also 42 U.S.C. § 4332(2)(E). This requirement applies to the Weiss Lake and Logan Martin Lake flood control operational changes contained in the TSP. However, by its own admission, the Corps has not yet considered several critical aspects of APC's proposal, including the effects of loss of flood storage, impacts on changes to flood operations, and how APC's pending FERC license will affect all APC operations in the Basin. Absent full consideration under NEPA, Georgia fears the Final SEIS addressing APC's request will be fatally deficient. For example, APC's request would result in a substantial reduction in available flood storage at Weiss Lake and Logan Martin Lake. While the Draft SEIS categorizes the incremental flood risk of the proposed change in APC operations as "Negligible/no change," Georgia believes the Final SEIS should explain how the Corps reached that conclusion. The Draft SEIS refers to the extra 20,000 cfs as a "non-damaging" release but does not explain why the Corps has determine that a potential 4.68 feet increase of flood water below Weiss or over 2.5 feet increase at Childersburg is "non-damaging"? Even if these potential increases will not affect structures, what will they affect? Does APC have easements for this additional flooding? Further complicating the Corps' ability to fully analyze APC's request is that the Corps cannot adequately anticipate APC operations until the Federal Energy Regulatory Commission ("FERC") issues a new license for APC's Coosa River Projects. As discussed above, NEPA requires the Corps' analysis and the underlying information be made available to the public prior to a Final SEIS. Doing so here will likely require the Corps to separate Georgia's Request from APC's Request given the Corps' impending	The Draft FR/SEIS extensively of other effects of each alternative indicated that the effects would. The additional 20,000 cfs (50,00 because APC has acquired add USACE has not categorized the damaging. USACE recognizes working with APC to determine elevation at Childersburg to floo account all the hydraulic effects the river stages within the study reach from Logan Martin Dam to between 50,000 and 70,000 cfs To determine the potential incre damages at the structure level. the entire area, but at specific p agricultural fields, pasture, and The reallocation study and WCN Any significant operational char during the relicense process. A reissued. Meanwhile, USACE of change and those that have been

as been corrected to exclude the specific power plant cost as well as to uction which is based on January 1948. The revised cost is presented in EIS main report and in Appendix B.

nment J.

documented the operational changes, impacts on authorized purposes, and e. In virtually all relevant categories, the analysis in the Draft FR/SEIS be no more than negligible or slightly adverse (or beneficial).

00 cfs to 70,000 cfs) from Logan Martin Dam is considered non-damaging ditional flowage easements extending downstream near Childersburg, AL. e increase in 4.68 ft downstream of Weiss Dam for the design storm as nonthere are changes in the downstream water surface for this event and is what level of offset is appropriate. The 70,000 cfs release will not raise the od stage. The HEC-ResSim rating curve for Childersburg does not take into as. Instead USACE relies on the HEC-RAS model to more precisely replicate y area. HEC-RAS modeling shows that the 70,000 cfs attenuates in the to Childersburg. Subsequently the peak river levels at Childersburg s are less than 2.5 ft additionally within current APC flowage easements. ease in flood water, HEC-FIA model was used to calculate the changes to The 4.68 ft below increase below the Weiss Dam spillway was not across points. Areas experiencing the most increases in flood elevations are forested lands.

M update can proceed prior to the completion of the Coosa FERC relicense. nge resulting from the Coosa Basin relicensing will be evaluated by USACE Any necessary revisions to the WCM will be incorporated after the license is communicates directly with APC regarding any proposed operational en considered in the proposed APC modified operation.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	K	 B. The Draft SEIS does Not Establish that APC's Proposed Changes Comply with Statutory Requirements. Public Law 83-436 sets three express limits on APC's ability to modify flood control operations at its projects on the Coosa River: 1. The projects must continue to provide the maximum flood control that is economically feasible. 2. Total flood control storage of the Coosa projects may not be less than the storage of the valley area displaced by construction of the projects. 3. Total flood control storage may not be less in quantity and effectiveness than the amount of storage provided by the originally authorized Howell Mill Shoals project. While the Draft SEIS addresses the second limitation, it does not address the first, and it does not adequately address the third. With respect to the first limitation: Due to the potential impact of APC's proposed reduction in flood storage and revision in flood risk operations, the Corps should provide the public an opportunity to review its analysis of this statutory requirement. With respect to the third limitation, the Draft SEIS states that the Corps has reviewed documentation from APC and is "satisfied that the change in flood operations still provides more flood storage than the displaced valley storage," but the Draft SEIS does not explain why the Corps is "satisfied" and it does not provide that documentation for public review. Before selecting an alternative adopting APC's requested changes, the State requests that the Corps complete and explain its analysis of the limiting factors in Public Law 83-436. The State further requests that the Corps make all relevant information related to that analysis available for public review. 	The FR/SEIS includes detailed of extensive modeling and analysis management. That analysis inco- originally contemplated Howell I current conditions (the NAA). T ROD will provide further explana that the Coosa Power Act include process.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	L	VII. The Final SEIS may Proceed with the Allatoona Storage Reallocation without APC's Requested Flood Control Changes. Once the Corps has completed a full review of APC's proposed flood control changes, the Corps may determine that APC's request poses an unacceptable downstream flooding risk or does not comply the with the statutory requirements found in Public Law 83-436. Or, the Corps may still have insufficient information to fully analyze APC's request prior to the March 2021 deadline for responding to Georgia's Water Supply Request. If the Corps is unable or unwilling to implement APC's proposed changes at Weiss Lake and Logan Martin Lake within the required timeframe, the record contained in the Draft SEIS supports a decision by the Corps to issue the Final SEIS reallocating storage from Allatoona Lake without also addressing APC's requested changes. Alternatives 3, 4, 5, and 8 all reallocate storage at Allatoona Lake without including APC's requested changes. See Draft SEIS Table 4-5, page 4-16. Table 5-1 indicates that, in almost every respect, these alternatives are more beneficial, or at least no worse, than Alternatives 9, 10, 11, 12, and 13—the alternatives that include APC's proposed changes. See Draft SEIS, Table 5-1, pages 5-2 — 5-8. Table 5-1 shows that one of the benefits of the Allatoona-reallocation-only alternatives is that without APC's requested changes, water quality below Weiss Lake improves. In addition, the Draft SEIS includes an analysis of Alternative 3, which does not include APC's requested changes, fulfilling the Corps' obligations under NEPA to fully analyze alternatives that include the reallocation of storage in Allatoona Lake to meet Georgia's projected 2050 needs. Therefore, if the Corps determines that APC's proposed changes are not feasible, or if APC does not provide the necessary information in time to meet the Corps' March 2021 deadline for responding to Georgia's Water Supply Request, the existing record is sufficient for the Corps to grant just Georgia's request and pr	USACE agrees with the comme without APC's requested flood of USACE is not required, howeve USACE is aware of the Court-or analysis, and necessary items in
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Μ	VIII. The Final SEIS may Proceed with a Reallocation Entirely from Conservation Storage. The TSP grants Georgia's 2050 water supply request by reallocating storage from both the conservation and the flood pool. In addition to the TSP's hybrid reallocation, the Draft SEIS analyzed other alternatives reallocating storage only from the conservation pool. Alternative 10 is one such example. Alternative 10 is exactly the same as the TSP except that Alternative 10 reallocates all storage from the conservation pool only. By comparing the impacts on the seven authorized purposes outlined in Table 5-1 for Alternative 10 and the TSP, we can isolate the differences (or lack thereof) in impacts between a hybrid reallocation (TSP) and a conservation pool-only allocation (Alternative 10). In terms of water supply, flood risk management, hydropower, and navigation, the impacts between the TSP and Alternative 10 are identical. The impacts from both Alternative 10 and the TSP are very similar for fish and wildlife conservation. And, more importantly, as compared to the NAA, both Alternative 10 and the TSP have either "slightly beneficial" impacts or "negligible/no change" impacts on fish and wildlife conservation. The impacts on water quality the even the TSP and Alternative 10 are also very similar, with Alternative 10 having slightly more positive and slightly fewer negative impacts than the TSP. Finally, for impacts on recreation, Alternative 10 is coming from conservation storage, Allatoona Lake's level will be lower. As a result, the impact on recreation at Allatoona Lake from Alternative 10 is "slightly adverse" while the same impact from the TSP is "slightly beneficial." See Draft SEIS at Table 5-1. The above comparison analysis demonstrates that with certain isolated exceptions, the impacts between an all conservation reallocation (Alternative 10) and a hybrid reallocation (TSP) are nearly identical. This analysis provides the Corps with a sufficient record to choose an all conservation reallocation in the Final SEIS or	Concur. While the impacts are s RP. Alternative 11 provides for operation across the other proje comparison between Alternative

I descriptions of the alternatives and provides the results of USACE' sis of the effects of those alternatives on flood operations and flood risk indicates that the RP would provide more flood control storage than the Mill Shoals project, and greater flood risk management benefits overall than The Final FR/SEIS provides additional information on this analysis and the nation of the final USACE decision. Additionally, USACE has determined udes responsibilities implemented by FERC as part of a separate licensing

ent that it could proceed with the Allatoona water supply storage reallocation control changes, and instead review and decide on them at a later time. er, to address the APC request separately from the Georgia request. ordered deadline, and is working diligently to address all relevant comments, in order to issue the ROD on time.

similar across project purposes, USACE has selected Alternative 11 as the r the water supply needs requested by the State of Georgia and a balanced ect purposes. See Appendix B, Section 7.4 for additional discussion of re 10 and the RP.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	N	Comments on the Draft SEIS: 1. Figures 2-6, 2-10, and 2-12 contain dated information. The Corps should update storage volumes using updated information.	The values in the FR/SEIS repre
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	0	Comments on the Draft SEIS: 2. Section 3.1.1.5.3 (Page 3-9) (Lines 13-25): This paragraph states that the reported withdrawal numbers are from 2018. However, these withdrawal numbers are from 2006 (See Table 3-7).	Concur. It was our intent to pro- the time this section of the repor- the correct average values for 2 E.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Р	Comments on the Draft SEIS: 3. Section 3.1.2.1.7 Nonpoint Sources (Page 3-14) (Line 16): The Georgia Environmental Protection Division issues the fish consumption advisories, not the Georgia Wildlife Resources Division.	Correction has been made to m
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Q	Comments on the Draft SEIS: 4. Section 4.4.1.1 (Page 4-6) (Line 26): The sentence should read that the NAA uses 2006 water demands in the ResSim model instead of 2007.	The sentence has been correcte
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	R	Comments on the Draft SEIS: 5. Table 4-2 (Page 4-9): Among the values of storage reallocated, the number 52,775 acre-feet represents a total amount reallocated (including existing allocated storage), while the other reallocated storage values are incremental.	Concur. This has been updated
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	S	Comments on the Draft SEIS: 6. Table 4-2 (Page 4-10): The second assumption in Georgia's recommended storage accounting methodology states: "All storage accounts are full at 840 ft." It should state: "All storage accounts are full at Guide Curve."	Correction has been made to th
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Т	Comments on the Draft SEIS: 7. Table 4-2 (Page 4-10): The third assumption in Corps' storage accounting should indicate that all storage accounts are full at either 840 or 841 feet, depending on summer pool level of the alternative.	Concur. Correction has been m depending on the summer pool
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	U	Comments on the Draft SEIS: 8. Table 4-6 (Page 4-19): Hydropower statistics are inconsistent with Appendix D (Hydropower Impact Analysis).	The PDT has reviewed the FR/S (Appendix D, Attachment 1) and
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	V	Comments on the Draft SEIS: 9. Section 4.5.6 (Page 4-20) (Line 4): "Alternative 0, Alternative 1, and Alternative 2" should be Alternative 1, Alternative Ia, and Alternative 2.	Correction has been made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	W	Comments on the Draft SEIS: 10. Table 4-7 (Page 4-20): The Percent Change from Base in the last column is calculated as the difference between the Proposed Structures Impaired and the Base Structures Impaired divided by the Proposed Structures Impaired. The difference should be divided by the Base Structures Impaired. Similar issues occur in Table 4-8 (Page 4¬21), Table 4- 9 (Page 4-21), and Table 4-10 (Page 4-22).	Concur. Correction has been m
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Х	Comments on the Draft SEIS: 11. Table 5-1 (Page 5-3): Phosphorus - Etowah River — Canton, GA to Allatoona Lake —Alternative 3 slightly adverse result needs to be shaded pink.	Correction made in Table 5-1 of
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Y	Comments on the Draft SEIS: 12. Table 5-3 (Page 5-16): Georgia EPD was only able to partially replicate this table using the Corps' HEC-ResSim simulation results. Similar issues occur in Table 5-15 (Page 5-49). The Corps should provide a better articulation of how these tables were derived or the templates used in deriving these tables.	Spreadsheets have been provid
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	Z	Comments on the Draft SEIS: 13. Section 5.1.2.2 (Page 5-27) (Lines 9-10): "Any deviations between Alternative 11 and the NAA over that three-year period would are minor as shown in the figure." "would are minor" should be "would be minor."	The editorial correction was made
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AA	Comments on the Draft SEIS: 14. Section 5.2.2 (Page 5-35) (Line 12): Georgia's water temperature criteria are as follows: shall not exceed 90° F. At no time is the temperature of the receiving waters to be increased more than 5° F above intake temperature. See Ga. Comp. R. & Regs 391-3-603. The increase will not be more than 1.5°F applies to estuarine waters. See id. Georgia's water quality standards do not contain seasonal changes to the above temperature standard.	Deleted reference in the Final F estuarine waters.

resent the latest elevation volume area relationship for the APC projects.

ovide current withdrawal and return data associated with Allatoona Lake at ort was prepared. We have reviewed the source, revised the text to include 2018, and cited the source. We also made similar corrections in Appendix

nain report Section 3.1.2.1.7 and Appendix E, Section E.1.2.1.4.4.

ted to state that the NAA uses 2006 water demands.

to show the incremental value in Table 4-2.

ne table to reflect "All storage accounts are full at guide curve."

nade to indicate that all storage accounts are full at either 840 or 841 ft, I level of the alternative.

/SEIS for consistency and updated the Hydropower Analysis Report and Table 4-6 in the FR/SEIS main report as appropriate.

made to Tables 4-7, 4-8, 4-9, and 4-10.

the main report.

ded to GA-EPD that include the calculations in question.

de.

FR/SEIS to allowable seasonal changes to temperature which applies only to

Commenter D	Commenter	Representing	Comment	Comment	Comment	
S 05			1/20/2020			
5-05	Director	GAEPD	1/29/2020	AB	15. Section 5.16.1 (Page 5-67) (Lines 5-7): The language suggests that the Corps can terminate a storage agreement based on some unforeseen conditions. The Corps needs to define what these conditions are.	The cited language says: The storage agreements c conditions demonstrate tha authorized project purpose extremely remote. Concur with the GAEPD comme 1.c of the model water supply a The Government reserves authorized Project purpose may be necessary in the o not to make downstream in discretion, to inspect, mair If the contingency in Article 1.c the terms of the agreement itse Article 1.e provides for a reduct provisions of that article would r already be in the agreement. The model agreement also com payment terms are not met. Pro- terms of a water supply storage Because of the lack of clarity of FR/SEIS, Section 5.16.1. We d
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AC	Comments on the Draft SEIS: 16. Section 7.6.4 (Page 7-20) (Line 21): The annual first cost to the user is listed as \$21,968,000. According to Table 7.4, this is the total cost of storage. The annual cost of storage is listed as \$1,103,000.	Concur. The statement should cost to the user is"
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AD	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 1. Pertinent Data (Page xvii) (Line 35): Lake area acres are listed as 41,150 acres, while the ResSim model uses a lake area of 39,210 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AE	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 2. Pertinent Data (Page xvii) (Line 44): Lake area acres are listed as 2,000 acres, while the ResSim model uses a lake area of 2,004 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AF	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 3. Pertinent Data (Page xviii) (Line 6): Lake area acres are listed as 574 acres, while the ResSim model uses a lake area of 570 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AG	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 4. Pertinent Data (Page xviii) (Line 15): Lake area acres are listed as 30,200 acres, while the ResSim model uses a lake area of 30,027 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AH	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 5. Pertinent Data (Page xviii) (Line 44): Lake area acres are listed as 12,000 acres, while the ResSim model uses a lake area of 11,795 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AI	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 6. Pertinent Data (Page xix) (Line 6): Lake area acres are listed as 5,850 acres, while the ResSim model uses a lake area of 5,855 acres.	Correction made to pertinent da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AJ	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 7. Pertinent Data (Page xix) (Line 15): Lake area acres are listed as 5,880 acres, while the ResSim model uses a lake area of 5,937 acres.	APC (Stacey Graham) provided that HEC-ResSim value will nee Jordan Lake has 89% of combin
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AK	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 8. Pertinent Data (Page xix) (Line 25): Lake area acres are listed as 6,800 acres, while the ResSim model uses a lake area of 734 acres.	APC (Stacey Graham) provided value will be used in Master Ma Bouldin total storage.

could be modified or terminated if future unanticipated or unforeseen at their use by local water providers have unacceptable adverse effects on es or operations. However, the potential for such action is considered

ent; the basis for the cited language is unclear. It may be referring to Article agreement, which provides:

s the right to control and use all storage in the Project in accordance with ites. The Government further reserves the right to take such measures as operation of the Project to preserve life and/or property, including the right releases during such periods of time as are deemed necessary, in its sole ntain, or repair the Project."

came to pass, the Government would not need to terminate the agreement; elf, in Article 1.c, provide that withdrawal rights can be limited.

tion in storage space resulting from sedimentation, but again, triggering the not require termination or modification of the agreement; the provision would

templates termination, in Article 7 and Article 12 (if applicable), if the rovided that a user completes all required payments and complies with the e agreement, however, the user's rights to the use of storage are permanent. If the statement in the Draft FR/SEIS, it has been deleted from the Final defer to the standard language in the model water supply agreement.

not have included the word "annual." The statement now reads "The first

ata to make it consistent with ResSim and info presented in Table 1-1.

ata to make it consistent with ResSim and info presented in Table 1-1.

ata to make it consistent with ResSim and info presented in Table 1-1.

ata to make it consistent with ResSim and info presented in Table 1-1.

ata to make it consistent with ResSim and info presented in Table 1-1.

ata to make it consistent with ResSim and info presented in Table 1-1.

d information showing Jordan Lake acreage to be 5,890 acres. APC stated ed to be updated. The 5,890 value will be used in the Master Manual. ined storage of Jordan and Bouldin total storage.

d information showing the Bouldin project acreage to be 734 acres. This anual. The Bouldin project has 11% of combined storage of Jordan and

Commenter	Commenter	Representing	Comment	Comment	Comment	
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AL	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 9. Table 1-1 (Page 1-3): Weiss Top storage at top of flood pool is listed as 608,614 acre-ft but should be 608,641 acre-ft. Martin Total storage at normal pool is listed as 1,667,814 acre-ft but should be 1,628,303 acre-ft. Martin surface area at normal pool is listed as 39,807 acres but should be 39,210 acres. Yates Total storage at normal pool is listed as 55,992 acre-ft but should be 53,908 acre-ft. Yates surface area at noimal pool is listed as 2,045 acres but should be 2,004 acres. Thurlow Total storage at normal pool is listed as 18,494 acre-ft but should be 17,976 acre-ft. Thurlow surface area at normal pool is listed as 585 acres but should be 570 acres. Claiborne total storage at normal pool is listed as 102,408 acre-ft but should be 102,480 acre-ft.	Correction made to each figure
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AM	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 10. Figure 2-1 (Page 2-2): Listed Allatoona storage of 270,247 acre-feet is not consistent with storage of 281,247 acre-feet listed in Table 1-1.	Corrected value of 281,917 ac-f
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AN	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 11. Section 2-05 (Page 2-12) (Lines 7-8): States that reservoir covers approximately 5,890 acres, while ResSim model uses a value of 5,937 acres.	5,890 is the correct value. See
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AO	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 12. Table 4-1 (Page 4-1): The owner of R.L. Harris should be APC, not APO.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AP	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 13. Section 4-05 (Page 4-10) (Line 5): Update information in Tables 4-5, 4-6 and 4-7 as referenced in Preparer's Note.	Preparer's note removed and da
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AQ	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 14. Section 6-02 (Page 6-2) (Lines 38-39): The manual states "When flooding conditions exist in some or all of the ACT Basin, existing Corps streamflow and short- and long-range forecasting runoff models are run on a more frequent, as-needed basis." Does this sentence mean that the Corps will provide local inflow prediction to guide APC on how much surcharge should be released from APC projects? If so, what model is used for this prediction? What is the error for this prediction? We understand that the current flood risk analysis of Weiss and Logan Martin flood operations are based on historical hydrology in which the local inflow is perfectly known. However, in the actual operations, APC needs to rely on forecasted local inflow to determine the releases during flood event. Since the forecasted local inflow has inherent error in it, the flood risk analysis should consider such inherent error.	USACE does not provide inflow Water Management System-Hy Atmospheric Administration- (Ne releases are based on water on
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AR	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 15. Section 7-03 (Page 7-4) (Lines 10,16, 29): In these paragraphs, the manual appears to suggest that in "drought operations," the Corps could produce more power in Allatoona than the peak generation normally specified for Zone 1, Zone 2 and Zone 3. Such a conclusion is not consistent with the Drought Contingency Plan.	Even during a drought, peaking need that supports public health
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AS	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 16. Section 7-05 (Page 7-6) (Lines 28-30): The manual states "Under certain instances, induced surcharge operations will be required to assure project integrity. During induced surcharged operations, flows may increase the height of flooding levels downstream." This statement does not mention any flooding risk at downstream control points as mentioned in the individual manuals of Weiss and Logan Martin in which the induced surcharge should be cut back when the downstream control point is flooded or expected to be flooded [Rule 7, Table 7-1, Page 7-2 of Appendix A.4 Weiss Manual and Rule 5, Table 7-1, Page 7-2 of Appendix A.5 Logan Martin Manual].	The referenced rules in the Wei considerations based on the dis operations. The statement rema levels downstream. Additional c Logan Martin rule 5 are storm-d
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AT	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 17. Section 7-09 (Page 7-9) (Lines 5-7): The manual states "The reservoir storage allocated to water supply was proportionally reduced to 6,054 ac-ft for the City of Cartersville and 12,485 ac-ft for Cobb-Marietta. This was established when the reallocation at Allatoona was approved in 2021." This statement addresses existing allocated storage being updated to reflect the loss of conservation storage due to sedimentation and states that this storage amount was established in 2021. However, when the manual goes into effect in 2021, storage allocated to Cartersville and Cobb-Marietta will also include the additional storage reallocation anticipated in the TSP. Therefore, these numbers need to be updated to reflect the anticipated reallocation of storage.	GAEPD is correct. The allocate updated yield analysis performe
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AU	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 18. Page E-C-4, Table 1: The total storage at Full Pool of Jordan and Bouldin should be consistent with the numbers in Table 1-1.	Correction made to Table 1 on p
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AV	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 19. Page E-C-7: Figure 1 should be consistent with Figure 1-1	Figures made consistent with ea

as indicated.

ft made to Figure 2-1 and Table 1-1.

S-05,Comment AJ for background information.

lata updated in Tables 4-5,4-6, & 4-7.

w projections to APC. Inflow projections are developed by APC usingCorps ydrologic Modeling System (CWMS-HMS) models with National Oceanic and NOAA-) generated quantitative precipitation forecast (QPF) grid files. Flood n the ground.

operation could temporarily be greater than normal to meet a downstream h and safety.

eiss and Logan Martin reservoir WCMs are not absolute; they are optional istribution of the run-off. The same consideration is true for USACE nains true; induced surcharge operations may increase the height of flood clarification will be provided within individual WCMs. Weiss rule 7 and dependent and coordinated with USACE.

ed storage for the current water supply contracts was adjusted based on ed in 2019.

page E-C-4.

ach other.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AW	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 20. Page E-C-10: (Lines 1-2): The statement "The Corps' Allatoona Dam on the Etowah River creates the 11,862 acres Allatoona Lake." should be modified as "The Corps' Allatoona Dam on the Etowah River creates the 11,422 acres Allatoona Lake."	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AX	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 21. Page E-C-13, Figure 7: The Black Start Level is 502.5 feet, not 502 feet.	Figure updated to show the corr
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AY	Comment on the Master Manual (Appendix A.2 of Draft SEIS): 22. Page E-C-27: Table 8 needs to be updated according to new guide curves in Weiss and Logan Martin.	Table updated with information
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	AZ	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 1. Pertinent Data (Page xvi): Tailwater elevation is not consistent with ResSim Model Allatoona Tailwater setting.	Mobile District Water Manageme This rating will not match what is model in future applications. Th information related to tailwater e
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BA	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 2. Table 4-1 (Page 4-1): The owner of R.L. Harris is APC, not APO.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BB	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 3. Section 7-07 (Page 7-11) (Line 9): The manual states that current leakage from the powerhouse amounts to 40 to 60 cfs and is not included in the minimum releases through the turbines. Further, the resultant total continuous flow from the project ranges from 280 to 300 cfs. These numbers are not consistent with the ResSim model, which uses a 365 cfs minimum release.	Current leakage is approximatel resultant total continuous flow fr made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BC	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 4. Table 7-8 (Page 7-17): Table 7-8 needs to be updated according to the new conservation pool in APC reservoirs.	Table updated with information
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BD	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 5. Section 7-14 (Page 7-21) (Lines 23-25): With the normal seepage from the project, the actual minimum flow released to meeting the minimum flow is around 365 cfs, as presented in the HEC ResSim model.	Current leakage is approximatel resultant total continuous flow fr made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BE	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 6. Table 1 (Page E-D-4): The storage listed for Jordan, Walter Bouldin, Robert F. Henry, Millers Fen-y, and Claiborne reservoirs is not consistent with the ResSim Model.	Value in the WCM changed to m
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BF	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 7. Figure 7 (Page E-D-14): The level of Black Start Level for the H. Neely Henry Lake Guide Curve is 502.5 feet, not 502 feet.	Figure updated to show the corr
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BG	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 8. Page E-D-17 (Lines 15-16): The manual lists a surface area of 12,510 acres and a storage capacity of 234,200 acre-feet at a normal pool elevation of 125 ft NDVG29. The storage in the ResSim model is 234,211 acre-feet.	Value in the WCM changed to the
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	ВН	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 9. Page E-D-18 (Lines 3-4): In the manual, the reservoir has a surface area of 18,500 acres and a storage capacity of 346,254 acre-feet at a normal full pool elevation of 80 feet NGVD29. The storage in the ResSim model is 339,042 acre-feet and the area is 17,865 acres at a normal full pool elevation of 80.4 feet NGVD29.	Wording changed in the WCM to elevation 80.8, the upper limit of can vary from 80.0 to 80.8 ft. In maximum operating pool. We u fixed value to capture the range WCM. Paragraph 3-05 of the M
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BI	Comment on the Allatoona Manual (Appendix A.3 of Draft SEIS): 10. Table 8 (Page E-D-28): Table 8 needs to be updated in accordance to APC's new proposed rule curves.	Table updated with information
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BJ	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 1. Pertinent Data (Page xiii) (Line 2): Drainage area below Carters Dam should be Drainage area above Carters Dam.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	ВК	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 2. Pertinent Data (Page xiii) (Line 2): Drainage area below Carters and Allatoona Dam-square miles: missing number for drainage area.	Drainage area figure corrected.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BL	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 3. Pertinent Data (Page xv) (Line 2): Total storage, elevation 585.5 should be 1,436,764 acre-feet. Flood risk management storage, elevation 572 to 564 should be 301,986 acre-feet. Flood risk management storage, elevation 572 to 561 should be 384,000 acre-feet.	Corrections made.

rect elevation for Black Start Level.

provided by APC.

nent is developing an Allatoona Dam tailwater rating to publish in the WCM. is in the current HEC-ResSim model. We will acknowledge and modify the his change will not alter any modeling conclusions. The Pertinent Data elevation will be updated based on the revised rating curve.

ely 150 cfs and flow from the small unit ranges from 200 to 230 cfs. The from the project ranges from 350 to 365 cfs. Update to manual has been

provided by APC.

ely 150 cfs and flow from the small unit ranges from 200 to 230 cfs. The from the project ranges from 350 to 365 cfs. Update to manual has been

match HEC-ResSim value and Table 1-1 in the Master Manual.

rrect elevation for Black Start Level.

the HEC-ResSim value.

to reflect that storage capacity of 346,254 ac-ft and 18,500 acres is for of operating range. The Millers Ferry pool operates within a normal pool that In the WCM, we define 80 ft as the normal operating pool and 80.8 ft as the used 80.4 ft in the HEC-ResSim as the typical normal operating pool. It is a e of normal operating levels. The value of 80.4 ft is not required in the Miller Ferry WCM discusses the range of normal pool operations.

provided by APC.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	ВМ	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 4. Section 7-01 (Page 7-1) (Lines 11-13): Reservoir operations during large floods resulting from major storms will require special consideration and may deviate from the induced surcharge schedule when film forecasts of reservoir inflows and hydrographs of flows into Coosa River from sub-basins downstream from Weiss Dam show that the flood risk management operation can be improved. This needs to be clarified as we learned from the Draft SEIS that the benefit from cutback operation during flood operation is counted as the impacts of proposed operation. The manual states that this is a deviation from the induced surcharge schedule. It is unclear whether operation protocol should be closely followed (when downstream flood risk management benefit from cut-back in induced surcharge operation can be claimed) or deviated when real flood risks present themselves (when benefit cannot be claimed under the protocol).	The cutback provision is not a c WCM for clarity.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BN	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 5. Table 7-1 (Page 7-2) Weiss Flood Regulation Schedule: Rule 7 states "Stages downstream of Weiss exceed or are expected to exceed flood stage as a result of local inflows, temporarily reduce the release prescribed by the plan, provided that the release will not be reduced below 50% of the amount required by the surcharge and that the total addition of floodwaters stored in Weiss will not exceed a volume of 22,500 cfs-days". This rule needs to be clarified: (1) Who will forecast the local inflow? (2) What is the error of this forecasted local inflow? (3) Given a forecasted local inflow, where is the rating curve for downstream control points? (4) If the stage at downstream control points are forecasted to exceed or are expected to exceed flood stage as a result of local inflows, how do the operators at Weiss determine how much flow needs to be discharged? In order to do so, it seems that induce surcharge curves need to be modified according to different stages at the downstream control points.	The forecast is a joint effort bett generated. The operators use th updated periodically during the flows. Actual local flows are als gage sites and the dam. HEC-f points. The reservoir manager with the maximum cumulated vo ft). Reservoir and hydraulic mo reservoir release within the guid
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	во	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 6. Section 7-05 (Page 7-3) (Line 20): The manual states "where a higher release rate is dictated by induced surcharge curve shown on plate 22". There is no plate 22. Should plate 22 be changed to plate 7-3?	Reference to plate 22 changed
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BP	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 7. Section 8-02 (Page 8-3) (Lines 2-3): The manual states "The discharge percent chance exceedance curve at the dam site for the period 1967-2009 is shown on Plate 8-1." Plate 8-1 is automatic Rain Reporting Network, not referenced exceedance curve.	Appropriate curve will be added corresponding plate in the WCM
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BQ	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 8. Page E-A-3 (Line 2): Listed surface area (at 564 NGVD) of 30,200 acres should be 30,027 acres.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BR	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 9. Page E-A-4 (Line 1): The manual lists the discharge capacity, 26,128 cfs. This number is 26,021 cfs in the ResSim model.	Information from APC confirms
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BS	Comment on the Weiss Manual (Appendix A.4 of Draft SEIS): 10. Table 8 (Page E-F-27): This table needs to be updated according to new guide curves for Weiss and Logan Martin.	Table 8 has been updated with
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	ВТ	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 1. Pertinent Data (Page xiii): The manual states "Available conservation storage (summer), elev 465 to 452.5, acre-ft 144,383." In the ResSim model, the available conservation storage (summer pool, between elevation 465 to 452.5) is 141,897 acre-feet.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BU	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 2. Pertinent Data (Page xiii): The manual states "Inactive Storage, below elevation 452.5 ft NGVD 129,084." In the ResSim model, the inactive storage (below elevation 452.5) is 131, 570 acre-feet.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BV	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 3. Pertinent Data (Page xiii): The manual states "Seasonal storage, elevation 460 to 465 ft NGVD 29 (0.16 in runoff), acre-ft 67,602." It should be: "Seasonal storage, elevation 462 to 465 ft NGVD 29 (0.10 in runoff), acre-ft 42,574."	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BW	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 4. Section 4-06 (Page 4-6) (Line 12): The manual states "Discharge records from January 1965 through June 2019 at Logan Martin Dam are shown on Plates 4-2 and 4-3." The discharge data shown on Plates 4-2 and 4-3 are from 1965- 2003, not from 1965-2019.	Data has been updated.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BX	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 5. Section 5-06 (Page 5-6) (Lines 9-11): The manual states "The power plant at Weiss Dam is operated by remote control from the Alabama Control Center Hydro Desk located in Birmingham, Alabama." This should read: "The power plant at Logan Martin Dam is operated by remote control from the Alabama Control Center Hydro Desk located in Birmingham, Alabama."	Correction made.

deviation. More information has been added to Section 7-04 of the Weiss

tween the River Forecast Center, APC, and USACE. No forecast error is the latest QPF estimates provided by the River Forecast Center, which are 24-hour day. Runoff models use the QPF forecast to generate the local lso computed from observed flows at the U.S. Geological Survey (USGS) -RAS models are used to estimate the stage at the downstream control r can use a maximum reduction in the schedule surcharge release of 50% volume of 22,500 cubic feet per second per day (cfs-day) (44,625 acodels along with operator experience are used to determine required idelines of the WCM.

to Plate 7-2.

d to plates and reference to Rain Reporting Network will be corrected to the M.

that the manual discharge value should be used.

information provided by APC.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	BY	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 6. Section 5-08 (Page 5-7) (Lines 7-8): The manual states "For emergencies involving the Weiss Project" This should read: "For emergencies involving the Logan Martin Project"	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	ΒZ	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 7. Table 7-1 (Page 7-2) Logan Martin Flood Regulation Schedule: Rule 5 provides that when the reservoir elevation is above the project guide curve elevation with downstream control in place, APC is to reduce up to 50% of surcharge schedule, and operation is dictated by high downstream stages. Reduction in release is not to exceed 11,000 cfs-days in added storage. This rule needs to be clarified: (1) Who will forecast the local inflow? (2) What is the error of this forecasted local inflow? (3) Given a forecasted local inflow, where is the rating curve for downstream control points? (4) If the stage at downstream control points are forecasted to exceed or are expected to exceed flood stage as a result of local inflows, how do the operators at Logan Martin determine how much flow needs to be discharged? In order to do so, it seems that induce surcharge curves need to be modified according to different stages at the downstream control points.	The forecast is a joint effort betw generated. The operators use the updated periodically during the st flows. Actual local flows are als dam. HEC-RAS models are use manager can use a maximum re cumulated volume of 11,000 cfs experience are used to determine
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CA	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 8. Section 9-01 (Page 9-1): All references to "Weiss" should be replaced with "Logan Martin."	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СВ	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 9. Page E-A-3, Part 2: The manual states "Minimum Pool @ Elev 452.5, acre-fl 131,522." In the ResSim model, the inactive storage (below elevation 452.5) is 131,570 acre-feet.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СС	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 10. Page E-A-3, Part 2: The manual states "Usable Storage Capacity (between 465 and 452.5 NGVD), acre-ft 141,945." In the ResSim model, the storage between elevation 465 to 452.5 is 141,897 acre-feet.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CD	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 11. Page E-A-3, Part 2: The manual states that the surface area (at 465 NGVD) is acres 15,260. In the ResSim model the surface area (at 465 NGVD) is acres 15,269.	Correction made.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CE	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 12. Page E-C-5 (Lines 5-6): The manual states that the compulsory drawdown each year is to elevation 460.0. The compulsory drawdown should be to elevation 462 ft.	This information is found in the and APC will be prepared to rep
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CF	Comment on the Logan Martin Manual (Appendix A.5 of Draft SEIS): 13. Table 7 (Page E-F-27): This table needs to be updated according to new guide curves for Weiss and Logan Martin.	Table updated with information
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CG	Comment on the Modeling Report (Appendix C of Draft SEIS): 1. Evaporation time series in Oct/Nov 2011-Dec 2012 were modified. The modeling report should explain the reason and if UIF need to be changed as well.	Concur. The evaporation time s evaporation rate for climate cha 1999 was appended to existing through September 30, 2051. T appended to period ending Sep January 01, 1939 to September unimpaired flow. It was used or
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СН	Comment on the Modeling Report (Appendix C of Draft SEIS): 2. Page 74, Subsection 2. Two Foot Pool Draw Down — the rule described in this subsection is inconsistent with ResSim model. In the model, the same condition (Logan Marin inflow rising) has been stated twice with a AND between them.	The repeated "AND" condition in
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CI	Comment on the Modeling Report (Appendix C of Draft SEIS): 3. Table 11 (Page 92): The value of "12,985" acre-feet and "13,235" acre-feet of reallocated storage is inconsistent with the modeling parameters.	The model simulation has been ft revised to 12,850 ac-ft and 13
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CJ	Comment on the Modeling Report (Appendix C of Draft SEIS): 4. Page 122 (Line 4): The initial estimated outflow from HLCR is the local inflow —evaporation — delta storage — minimum out. This should be the local inflow —evaporation — delta storage.	Concur with comment. The Hyd
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СК	Comment on the Allatoona-Coosa Reallocation (ACR) Water Supply Reallocation (WSR) Hydropower Analysis Draft (Appendix D of Draft SEIS): 1. Section 2.4 (Page 15) (PDF Page 132/196): Except for scenarios Base2018 and Basecap, the reallocation storages for other scenarios are inconsistent with Draft SEIS. A reallocation of "32,809 AF" is not correct in any of the federal action alternatives.	Concur. The correct values hav (Appendix D, Attachment 1).

ween River Forecast Center, APC, and USACE. No forecast error is the latest QPF estimates provided by the River Forecast Center, which are 24-hour day. Runoff models use the QPF forecast to generate the local so computed from observed flows at the USGS gage sites and the sed to estimate the stage at the downstream control points. The reservoir reduction in the schedule surcharge release of 50% with the maximum s-day (21,810 ac-ft). Reservoir and hydraulic models along with operator ine the required reservoir release within the guidelines of the WCM.

old Memorandum of Understanding (MOU). A new MOU between USACE place this version.

provided by APC.

series from October 2011 to December 2012 was revised to extend the netange modeling. The historic time period Oct 01, 1941 to September 30, gevaporation time series beginning October 01, 2011, creating a time period Then, the historic Oct 01, 1951 to September 30, 1999 period was betember 30, 2051. This resulted in a complete evaporation time series from r 30, 2099. The extension of this time series has no effect on the inly for the HEC-ResSim model simulations.

in the model has no effect on the results.

n re-run. The values in the report have been changed as follows: 12,985 ac-3,235 ac-ft revised to 12,950 ac-ft.

drologic Engineering Center has revised the report text.

ve been inserted in appropriate locations in the Hydropower Analysis Report

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CL	 Comment on the Allatoona-Coosa Reallocation (ACR) Water Supply Reallocation (WSR) Hydropower Analysis Draft (Appendix D of Draft SEIS): Section 3.2 (Page 18) (PDF Page 140/196) (Table 3-4): For energy produced by Carters, the simulated energy produced in each day is exactly same for Base2018 and BaseCap scenario, but the numbers in the table are different. Thus, the energy production needs to be checked. Water supply operation only affects Allatoona, not Carters. There is no reason for Carters' energy production to be different among the alternatives. 	The PDT reviewed Appendix D f
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СМ	 Comment on the Allatoona-Coosa Reallocation (ACR) Water Supply Reallocation (WSR) Hydropower Analysis Draft (Appendix D of Draft SEIS): 3. Section 3.4 (Page 25) (PDF Page 147/196) (Table 3-9): These number needs to be checked according to the results of Table 3-4 in Page 18 (PDF Page 140/196). 	The PDT reviewed Appendix D f
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CN	Comment on the Allatoona-Coosa Reallocation (ACR) Water Supply Reallocation (WSR) Hydropower Analysis Draft (Appendix D of Draft SEIS): 4. Section 4.1.3 (Page 30) (PDF Page 155/196) (Table 4-3): For Dependable capacity of Carters, energy produced in each day is exactly same for Base2018 and BaseCap scenario, but dependable capacity in BaseCap is lower than that in Baseline.	The PDT reviewed Appendix D f
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	со	 Comment on the Allatoona-Coosa Reallocation (ACR) Water Supply Reallocation (WSR) Hydropower Analysis Draft (Appendix D of Draft SEIS): 5. Section 4.2.3 (Page 39) (PDF Page 165/196) (Table 4-7): These numbers need to be updated with the results of Table 4-3. 	The PDT reviewed Appendix D f
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СР	Draft SEIS Error in Modeling Georgia's Storage Accounting They discuss an error in the Corps' modeling of alternatives using Georgia's storage accounting mechanism. In order to meaningfully compare alternatives, we must first address and correct this modeling error. We will use Alternative 13 to demonstrate the error. Within the Corps' ACT Basin HEC-ResSim model, the Corps developed a script to calculate storage account balances (State Variable named Accounting_HLCmain). Part of the script used to compute CCMWA's account balance is shown in Figure 2. In the two lines of highlighted script, the Corps left out the conversion factor of 1.9835 which converts cubic feet per second per day (cfs-day) to acre-feet. To correct the error, the Water Supply Program revised the script to include the correct multiplication factor.1 We use this corrected model in our analysis and summaries in this technical memorandum. For concise reference and to avoid confusion, we refer to the corrected Alternative 13 using Georgia's storage accounting methodology, storage in Hickory Log Creek Reservoir was not fully utilized in the critical hydrologic period. The Program revised the Corps model to use up available storage in Hickory Log Creek Reservoir to support water supply operations in Allatoona. The same issues exist in all the alternatives using Georgia's storage accounting mechanism. These are Alternatives 3, 5, 12, and 13. This error does not occur in the alternatives using the Corps' existing storage accounting methodology. To correct the error, the Water Supply Program revised the script to include the correct multiplication factor.1 We use this corrected model in our analysis and summaries in this technical memorandum. For concise reference and to avoid confusion, we refer to the corrected Alternative 13 as alternatives using the Corps' existing storage accounting methodology. To correct the error, the Water Supply Program revised the script to include the correct multiplication factor.1 We use this corrected model in our analy	The HEC-ResSim model has be missing flow unit conversion has revised to reflect this change.
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CQ	The Draft SEIS Allows the Corps to Grant Georgia's Water Supply Request Even if It Does Not Grant APC's Requested Operational Changes (Comparison between Alternatives 11 and 8). To determine whether the Corps can grant Georgia's Water Supply Request even if it cannot grant APC's request, we must compare two alternatives that both grant Georgia's request and are identical except that one incorporates proposed APC operational changes and the other does not. For purposes of this memo, we chose Alternative 11 and Alternative 8. Figures 15 and 16 show that both median flow and flows that are exceeded 90% of the time at Mayo's Bar are identical in Alternative 11 and Alternative 8. This can also be shown by flow statistics in Tables 2 and 3. Environmental consequences upstream of the state line are identical in Alternative 11 and Alternative 11. Having established that flows at the state line are the same for Alternative 8 and Alternative 11. Having established that flows at the state line are the same for Alternative 8 and Alternative 11 are entirely the result of proposed operational changes by APC. That is, environmental impacts downstream of the state line occur because of the APC changes, not because of the Allatoona storage reallocation. Preparer's Note: See the Technical Memorandum for futher analysis on Flow at Coosa River Downstream of Logan Martin, Flow at Alabama River at Confluence between Coosa and Tallapoosa Rivers, Drought Operations, Navigation, and Hydropower Generation.	USACE concurs that the impact is the APC requested change) a APC-proposed operational chan option to choose an alternative i the decision maker.

for consistency and accuracy and updated it where appropriate.

for consistency and accuracy and updated it where appropriate.

for consistency and accuracy and updated it where appropriate.

for consistency and accuracy and updated it where appropriate.

een corrected regarding the Georgia storage accounting methodology. The as been corrected. Relevant charts, tables and comparisons have also been

cts above Weiss Lake are the same for Alternatives 8 and 11 (the difference and that impacts downstream of the state line would be the result of the anges at the Weiss and Logan Martin projects. The decision maker has the e included in the FR/SEIS. The RP (Alternative 11) is the recommendation to

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CR	Draft SEIS Places 35 mgd on Richland Creek Reservoir in All Alternatives and Overestimates Water Supply Withdrawals. Upon review of the HEC-ResSim models accompanying the Draft SEIS, we discovered that the NAA (Alternative 1) and all the federal action alternatives have incorporated a water supply demand of 35 mgd placed on Richland Creek Reservoir (RCR). This is incorrect. While RCR is deigned to someday potentially support a 35 mgd demand, RCR does not currently support such a demand nor is it projected to support such a demand through 2050. Placing a 35 mgd water supply demand on RCR overestimated the overall impact of water supply withdrawals. Paulding County's 2006 demand was 10.57 mgd. This 10.57 mgd was included as part of Allatoona Lake's 2006 water supply demand, and therefore was captured in the Draft SEIS NAA. Paulding County's projected 2050 demand (by the North Georgia Metropolitan Water Management District's Water Management Plan) is 24 mgd.5 Both numbers—10.57 mgd and 24 mgd—are much lower than the 35 mgd used in the Draft SEIS modeling. When Georgia submitted its 2018 ACT Water Supply Request update to the Corps, we placed Paulding County's current water demand of 10.57 mgd on Allatoona Lake as part of the Baseline-2006 Alternative. We did not have a separate Paulding County demand placed on either the Kingston Reach or the RCR because Paulding County is current withdrawing from Allatoona Lake (via CCMWSA). The NAA used in the Final SEIS should follow Georgia's approach and not place an additional 35 mgd demand on RCR since Paulding County's demand of 10.57 mgd has already been reflected in demand placed on Allatoona. The NAA in the Draft SEIS overestimates total withdrawals within Georgia by 35 mgd. In modeling water supply alternatives that meet Georgia's 2018 updated request, we placed Paulding County's current demand of 10.57 mgd in the Kingston Reach. 6 We understand that Paulding County's demand will ultimately come out of the stretch of the Etowah River between Allatoona Dam and the Kings	USACE records indicate Richlar gallons per day (mgd) from Pau application and Final EA submit
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CS	Draft SEIS has Inconsistent Basin Inflow Drought Trigger. Upon review of the HEC-ResSim models accompanying the Draft SEIS, we discovered an inconsistency in basin inflow, one of the three elements in the drought triggering mechanism. The other two elements are state line flow and composite storage. The basin inflow element was developed as part of the 2015 ACT Water Control Manual, containing two concepts – Computed Basin Inflow and Required Basin Inflow. This basin inflow element of the drought response is triggered when the former is lower than the latter. Required Basin Inflow is derived from the volume of water necessary to fill APC reservoirs to their respective rule curves (top of conservation pool). The Draft SEIS, and specifically the TSP, contemplates changes to APC's rule curves at Weiss and Logan Martin Lakes. As a result, the volume of water needed to fill these reservoirs under the TSP and all alternatives adopting APC's proposed changes will be different from the volume of water needed when the 2015 Manual was published and different from the volume of water needed for all alternatives not adopting APC's proposed changes. Therefore, the computation for Required Basin Inflow must be updated in the Final SEIS for all alternatives adopting APC's proposed changes.	The HEC-ResSim model and W
S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	СТ	Inconsistency in Flood Impact Modeling Data. Although Table 5-1 of the Draft SEIS shows a "Negligible/no change" effect in flood risk management on the Coosa River downstream of Weiss under the TSP (Alternative 11), the Corps' modeling results suggest otherwise. The maximum simulated gage height is 1.30 feet higher under the TSP (Alternative 11), indicating two points: (1) the additional inundation is the result of APC's proposed changes; and (2) implementing APC's proposed operational changes could have a noticeable impact (not "negligible/no change") on flood risk management. The Draft SEIS also states that "APC has proposed to modify flood operations by releasing more water during flood events to keep reservoir pool levels within the newly proposed maximum surcharge elevation and to acquire the necessary flowage easements downstream to accommodate increased non-damaging releases from 50,000 cfs to 70,000 cfs." (See Draft SEIS at 2-23, Lines 7-10.) However, this statement is inconsistent with ResSim modeling data and the relevant flood stage as set by the National Weather Service (NWS). Given this substantial increase in stage height, it is unclear how the Corps can characterize the extra 20,000 cfs as "non-damaging releases." The Final SEIS should address this discrepancy and explain how the Corps determines the "non-damaging" qualifier	USACE concurs that the daily H comparing the NAA to the RP. flood operation for the reservoirs specific reservoir operation durin Feb 1990 Flood Event) includes The Gadsden stage is actually h

and Creek Reservoir is expected to meet a daily demand of 35 million ulding County. This information is consistent with the Section 404 permit itted by Paulding County.

VCMs have been revised to reflect the change.

HEC-ResSim model indicates an increase in the stage at Gadsden when . The daily model is not a short enough time interval to capture the complex irs. The HEC-ResSim hourly model is used to evaluate the impacts of the ring flood events. Appendix C, Attachment 6, Page 19 (Gadsden Elevation es the hourly modeling result at Gadsden for the February 1990 flood event. v lower for the APC-modified flood operation.

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S-05	Richard E. Dunn, Director	GAEPD	1/29/2020	CU	Summary. Based on the Draft SEIS and our technical evaluation, we make the following observations. First, the Final SEIS must correct the modeling error related to Georgia's storage accounting mechanism. Second, with the Georgia's corrected storage accounting mechanism, Alternative 13A provides the same or better environmental consequences as compared to the TSP (Alternative 11). Thus, the Final SEIS should consider changing the TSP from Alternative 11 to Alternative 13A. Third, if the Corps decides not to move forward with the APC Study, the Draft SEIS provides sufficient information for the Final SEIS to choose an alternative that only addresses the Reallocation Study. This is because the environmental consequences of Georgia's water supply request are identical in the Georgia portion of the ACT Basin in alternatives with and without the APC operational changes (e.g., Alternative 8 vs. Alternative 11). We have also observed that the environmental consequences in the Alabama portion of the ACT Basin are no worse in an alternative (Alternative 8) without the APC operational changes than one with such changes (Alternative 11). Finally, the Final SEIS must address the technical issues raised in this memorandum.	The HEC-ResSim model has be missing flow unit conversion ha Georgia's recommendation to c Allatoona water supply storage approved.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	A	In summary, Alabama is concerned that the draft FR/SEIS has injected the Corps of Engineers into a matter that should be resolved by the States—namely, the long-running dispute between the States of Alabama and Georgia over the allocation of water in the ACT Basin. This is a dispute that should be resolved through the development of consensus between the States and ultimately by an interstate compact between the States, not by the unilateral action of a federal agency. The draft FR/SEIS unnecessarily interferes with State prerogatives, subverting the authorized purposes for Allatoona Lake of hydropower and navigation, for the sake of allowing Georgia to use federal resources to withdraw water from the ACT Basin that should be flowing into Alabama. This proposed action would violate the Water Supply Act and other federal laws. The Corps should withdraw the proposed action and choose an alternative that allows the States to reach a consensus on this issue of inherently state concern.	USACE plays no role in any dis order that directs USACE to ma storage in Allatoona Lake under USACE has previously deferred between Alabama and Georgia, was unreasonable and directed any "alternative that allows the many decades to reach a conse that reflects any consensus amo
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	В	I. There is Zero Analysis of Whether the Reallocation of Storage Space Required Congressional Authorization Under the Water Supply Act The only authority the Corps has to reallocate storage space in Allatoona Lake comes from the Water Supply Act of 1958, 43 U.S.C. § 390b et seq. Under the Water Supply Act, however, the Corps must get congressional approval for any reallocation that will "seriously affect" authorized project purposes. It must also get congressional approval for any reallocation that will "seriously affect" authorized project purposes for which the project to include storage as provided in [43 U.S.C. § 390b(b]) which would seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed, or 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(e). Without congressional approval, the Corps has no authority to take any such major action. Se. Fed. Power Customers v. Geren, 514 F.3d 1316, 1323 (D.C. Cir. 2008). The draft FR/SEIS cites this statutory limit, see FR/SEIS, 1-4, and it implies that the Corps has evaluated whether it has authority to adopt each of the proposed alternatives, see id. 4-12, 4-17. Yet the Corps never explains how it construct the scope of its authority under the Water Supply Act. There is, in other words, zero analysis about whether Congress must approve the reallocation of storage space in Allatoona Lake .[Footnote1] (FOOTNOTE 1: This failure is especially concerning because the Corps appears to conflate the "seriously affect" and "major operational change" prongs of the Water Supply Act. The anal paperant reference to the "seriously affect" prongs. FR/SEIS, 4-12. But then, in explaining what that criteria means, the Corps states that "[a] naction that would result in a major operational change would need	USACE agrees that before adop discretionary authority under the or operational change or serious prior to adopting any alternative conclusions. USACE notes, however, that th to authorized purposes, and oth analysis in the Draft FR/SEIS in (or beneficial).
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	С	II. The Available Data Shows that Congressional Authorization Was Required to Reallocate the Storage Space to Water Supply Had the Corps performed the requisite statutory analysis, it would have revealed that the proposed reallocation of storage space in Allatoona Lake towards water supply does in fact "seriously affect the purposes for which the project was authorized" and "involve major structural or operational changes," such that it needed congressional authorization.	USACE agrees that before adoptiscretionary authority under the or operational change or serious prior to adopting any alternative conclusions. USACE notes, however, that the to authorized purposes, and oth analysis in the Draft FR/SEIS in (or beneficial).

been corrected in regard to the Georgia storage accounting methodology, the as also been corrected. See the response to S-05, Comment A, about change the RP to Alternative 13. USACE will consider selecting only the e reallocation if the proposed APC flood operations modifications are not

spute between the states; rather, USACE is complying with a federal court ake a reasoned decision in response to the State of Georgia's request to use er federal law, specifically, the WSA and the project authorizing legislation. d making decisions on that request, in part because of the ongoing dispute a, but the district court ruled that USACE's delay in responding to the request d USACE to respond by March 2021. Additionally, USACE is not aware of states to reach a consensus on this issue." The states have failed over ensus, and neither Alabama nor any other party has proposed an alternative iong Alabama and Georgia.

pting the RP or any other alternative involving an exercise of its e WSA, it must document that such action would not involve major structural usly affect any authorized purpose. USACE will complete that legal analysis e in the final EIS and will document in the ROD, as appropriate, any relevant

The Draft FR/SEIS extensively documented the operational changes, impacts her effects of each alternative. In virtually all relevant categories, the indicated that the effects would be no more than negligible or slightly adverse

pting the RP or any other alternative involving an exercise of its e WSA, it must document that such action would not involve major structural usly affect any authorized purpose. USACE will complete that legal analysis e in the final EIS and will document in the ROD, as appropriate, any relevant

he Draft FR/SEIS extensively documented the operational changes, impacts ther effects of each alternative. In virtually all relevant categories, the indicated that the effects would be no more than negligible or slightly adverse

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S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	D	A. The Corps must account for the total amount of storage space reallocated to water supply at Allatoona Lake The Tentatively Selected Plan ("TSP") proposes reallocating 33,872 ac-ft of storage space in Allatoona Lake, including 22,202 ac-ft from conservation storage and 11,670 ac-ft from flood storage; the latter is achieved by raising the reservoir's guide curve. See FR/SEIS, 7-1. This particular reallocation dedicates 12.02% of conservation storage to water supply. See C, Figure 7-1. To be sure though, this particular reallocation is not the only reallocation that matters for purposes of the Water Supply Act analysis. Rather, the Corps must consider the total amount of storage space allocated to water supply since Allatoona Lake was first "authorized, surveyed, planned, or constructed" in the 1940s. 43 U.S.C. § 390b(e). Otherwise, the Corps could propose individual reallocations that on their own might not "seriously affect" other project purposes or involve "major operational change," but when aggregated do. Accordingly, when the Corps actually performs the statutory analysis in the final FR/SEIS, it ought to account for the storage space reallocated to water supply in the 1963 CCMWA contract and the 1966 and 1991 City of Cartersville contracts. See FR/SEIS, 2-13 n.2. Doing so reveals that, at least according the Corps' data, the total storage space allocated to water supply at Allatoona Lake is 52,411 ac-ft, or 18.54% of conservation storage. See id., 7-1; Stover Decl. at Exh. 2.	USACE agrees that it must con determination to exercise its dis Comment B, USACE has not ye ROD.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	E	 B. The proposed reallocation is understated A reallocation of 52,411 ac-ft or 18.54% of conservation storage alone requires Congress's approval. Yet there are at least two reasons to believe these figures are understated. First, the proposed reallocation of 52,411 ac-ft does not take into account diversions upstream from Allatoona Lake. This matters because net upstream diversions—the total amount of withdrawals in excess of any returns—reduce a reservoir's critical yield, which in turn determines how much storage space is needed to satisfy a user's water-supply demands. The lower the critical yield, the more storage needed to satisfy a given demand. Thus, if the critical yield is erroneously believed to be higher than it really is, then more storage space in order to satisfy the full 94 mgd requested by the State of Georgia, the Corps relies on a critical yield of 784.38 cfs, a figure which does not account for upstream diversions. See FR/SEIS, Appx. C, Attach. 10, Table 2 (Method A); see also Stover Decl. at Exh. 2. However, a critical yield that accounts for the upstream diversions identified by the Corps is just 765.34 cfs. To continue to meet Georgia's full 94 mgd of water supply needs, then, the Corps would need to reallocate an additional 1,301 ac-ft of storage space. Second, even these higher figures still may not accurately reflect the reallocation needed to meet Georgia's demands. That is because Method B used in the Corps' critical-yield analysis does not appear to account for the full amount of upstream diversions that it had accounted for in a prior critical-yield analysis performed in 2010. Specifically, in that 2010 analysis, the Corps identified 36 cfs in upstream diversions.2 But in the 2019 analysis, as noted above, the Corps identified just 19 cfs in opstream diversions. See FR/SEIS, Appx. C, Attach. 10, Tables 2 & 3; Stover Decl. at Exh. 2. The Corps does not say why there was a 47% drop in upstream diversions. The State of Alabama has done this analysis a	The WSA does not impose a perstorage. See In re MDL-1824 T 2012 Stockdale Opinion. USACE recognized that upstreat impact the project yield. Conset diversions as described in the ut There are two Allatoona yield vi- guide curves. Yield for Allatoor Allatoona winter level 824.5 ft at in the upstream diversion amout changes from the 2010 analysis 2010. A resurvey of the sedime as a result of changes in sedime changes to the top of conservat ac-ft to 192,381 ac-ft, the bottor storage from 5 670,047 ac-ft to representation of the leakage. exist. A correction was made to Additionally, the Hickory Log Cr to the updated HEC-ResSim Yi correct.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	F	C. Assumptions being made about projected future withdrawals and returns are not sufficiently explained In granting Georgia's water supply request for 94 mgd, the draft FR/SEIS makes at least two erroneous assumptions that call into question its environmental-impact analysis. First, in evaluating Georgia's request for its projected water-supply demands of 94 mgd in 2050, the Corps—relying on data provided by the Metropolitan North Georgia Water Planning District ("MNGWPD")—assumes that returns to Allatoona Lake from two wastewater treatment facilities owned by the Cobb County Water System will increase in the future from 17.2 mgd in 2006 to 25.6 mgd by 2050. See FR/SEIS, Appx. B, Attach. 1, Table 5. According to the Corps, "[c]urrent withdrawals from Allatoona Lake and associated returns of treated wastewater to the ACT River Basin are of specific interest in considering the proposed reallocation of storage at Allatoona Lake." FR/SEIS, 3-9; see also id. 5-67 ("The extent to which treated wastewater is returned to the lake, or at least to the ACT River Basin, would partially offset the commitment of additional reservoir storage to the water supply purpose."). While the Corps' storage accounting policy rightly does not credit individual users' storage accounts for returns, its decision to consider them in granting Georgia's request is problematic for several reasons. As an initial matter, there is no reason to believe these returns will actually be made into Allatoona Lake. Additionally, there is no explanation in the draft FR/SEIS for why, as the MNGWPD has projected, returns from the two wastewater treatment facilities will increase over the next 30 years. Second, the draft FR/SEIS appears to presume that the rate of withdrawals upstream from Allatoona Lake will decrease in the future, but it is not clear if that presumption is the right one since the report does not contain any data on the matter. Throughout the draft FR/SEIS, the Corps acknowledges that upstream withdrawals from the Allatoona watershed have b	The RP sizes the water supply the wastewater return rate. Get segmentation of the individual of operation in its entirety without concluded that the expansion o and vetted the analysis to ensu future demands in the planning of the ACT River Basin. Increa conjunction use of the Hickory I

nsider the cumulative total of storage reallocated to water supply in making a scretionary authority under the WSA. As noted in response to S-06, vet performed that analysis, but will document any relevant conclusions in a

ercentage or other numerical limit on the USACE authority to reallocate Fri-State Water Rights Litigation, 644 F.3d 1160 (11th Cir. 2011) and the

am river and tributary diversion of the Allatoona reservoir may adversely equently, the updated yield is based on Method B which considers upstream updated Critical Yield report (Appendix C, Attachment 10, section 3.5). alues computed for the reallocation study representing the two different na winter level 823 ft and summer level 840 ft is 865.3 cfs (494.7 mgd) and and summer level 841 ft yield is 872.8 cfs (505.6 cfs). There was no change Int for the HEC-ResSim model. The 2019 Allatoona Yield include two s. The Allatoona updated elevation volume area relationship was revised in entation ranges was performed in 2010. Area-capacity curves were updated entation in the lake. The effects of sedimentation resulted in capacity tion in summer from 379,469 ac-ft to 349,922 ac-ft, in winter from 214,473 m of conservation from 82,891 ac-ft to 68,006 ac-ft and the top of flood 626,860 ac-ft. The second change was a modification in HEC-ResSim In computing the yield of the reservoir, the powerhouse leakage should not o remove the 75-cfs leakage value from the HEC-ResSim Yield model. reek Reservoir is included in the yield model. This information will be added ield Report. This addition text will help clarify why the USACE computation is

storage account based on the gross withdrawal amount and independent of orgia water supply request was considered in its entirety with no components. USACE similarly considered APC's request for modified flood segmentation. USACE's review of the Georgia water supply request of the wastewater treatment plant could happen. The USACE team reviewed ire reliability and accuracy of the data, and then the data were used as the process. USACE did not adjust the water demand for the remaining portion ised water supply use was limited to Allatoona. Two alternatives included Log Creek Rreservoir.

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S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	G	<u>D. Regardless which reallocation amount is correct, the Corps needs the approval of Congress</u> Whether it is an 18.54% or 19.43% reallocation of storage space, or somewhere in between, it needs approval from Congress. Otherwise, the Corps will act "in excess of [its] statutory authority." 5 U.S.C. § 706(2)(C).	The reallocation of storage does affects the purposes for which the other numerical limit on the US/ Rights Litigation, 644 F.3d 1160
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Η	1. The proposed reallocation would "seriously affect" other project purposes—specifically hydropower The Corps, as Alabama explained earlier, does not perform any meaningful analysis under the Water Supply Act of whether or not the proposed reallocation "seriously affects" other project purposes for which Allatoona Lake was originally "authorized, surveyed, planned, or constructed." 43 U.S.C. § 390b(e). When it does perform this analysis in the final FR/SEIS, however, the Corps should focus on the effects to the project stree original purposes as set forth in Section 2 of the River and Harbor Act of 1945, which as the Corps knows, are hydropower, navigation, and flood control. The proposed reallocation here would indeed seriously affect these original project purposes, and in particular would negatively impact the hydropower purpose. The draft FR/SEIS concludes that operations under the TSP would result in only a "slightly adverse" effect to hydropower in the ACT system as a whole, and would actually benefit hydropower at Allatoona Dam. But these findings are flawed because they use the wrong baseline against which to compare the TSP's effects. In assessing the impact to hydropower at Allatoona Dam, the Corps compared conditions under the NA Action Alternative ("NAA") with conditions under the TSP, and concluded that the TSP will benefit hydropower there. Specifically, the Corps estimates that the value of dependable capacity will increase from \$12,171,439 under the NAA to \$12,176,229 under the TSP. But there are two problems with using the NAA as the baseline against which to measure changes to hydropower. First, the NAA includes CCMWA and Cartersville's excessive withdrawals. The Corps appears to acknowledge the issue with an NAA baseline, reflected by its decision to include in the draft FR/SEIS a "Baseline Capped" alternative that "caps" Georgia's withdrawals at the contractually authorized limits. But the Baseline Capped is used only sparingly as a reference point in the draft FR/SEIS. It is not the bas	USACE concurs that the baselic congressional authorization for evaluation should consider the discretionary authority of the Wa alternative in the Final FR/SEIS USACE notes, however, that the to authorized purposes, and oth analysis in the Draft FR/SEIS in (or beneficial). Alternative 2 pro storage accounts. Comparison the result of a storage reallocati changes have occurred in the b from the Proposed Action Alterr Manual and NAA in the final FR updates. Changes include: A. Richland Creek Reservoir–ad B. Allatoona Lake, Elevation-Str C. Elevation-Storage-Area Tabl D. Pumping Hours at Carters La E. Weiss Bypass Operation–ad F. H. Neely Henry Updates–Gaa G. Childersburg and Gadsden J H. Harris Operation–updated I. Martin Lake Guide Curve–ado J. Millers Ferry and RF Henry P
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	I	 2. The proposed reallocation involves "major operational change" The Water Supply Act's other prong also requires congressional approval of the proposed reallocation. What constitutes "major structural or operational change" is not defined by the statute, but as previewed above, at least one court has looked to the percentage of conservation storage being reallocated to determine whether the action the agency proposes is sufficiently "major." In Geren, the D.C. Circuit Court of Appeals observed that a reallocation of 23.7% of Lake Lanier's conservation storage space to water supply was "[o]n its face" the "type of major operational change referenced by" the Water Supply Act. 514 F.3d at 1324. Even a 9% percent (approximately 95,000 ac-ft) increase was "significant," according to the court. Id. Here, even assuming that 18.54% accurately reflects the size of the reallocation of Allatoona Lake's storage space to water supply, the TSP still easily exceeds the D.C. Circuit's threshold. Moreover, as also noted earlier, the proposed reallocation easily exceeds the standard set forth in the Corps' own rules. There is good reason to rely on the sorts of objective, quantifiable limits of the sort articulated by the D.C. Circuit in Geren and the Corps in its regulations. In particular, they serve as useful guidelines in attempting to determine where to draw the line between "major" and anything less than "major." They also help ensure that the Corps does not sidestep Congress as it did when reallocating storage space in Lake Lanier. Notably, the Corps seems to acknowledge in the draft FR/SEIS that some reallocations are big enough to require Congress's approval. One of the initial alternatives, WS4, proposed a reallocation of 52,775 ac-ft, or 16.34% of conservation storage. Yet the draft FR/SEIS does not explain in enough detail why WS4 but not the TSP was screened out, and in particular, does not say whether it was because of the size of WS4's reallocation. N	The statute does not impose a p storage. (See In re MDL-1824 Stockdale Opinion.) Thus, USA that the RP would involve major purpose. USACE concurs that it must doo decision is not "major" and that applicable, will be documented i See also responses to S-06, Co

s not result in major structural change or operational change that seriously the project was authorized. The WSA does not impose a percentage or ACE authority to reallocate storage. See In re MDL-1824 Tri-State Water 0 (11th Cir. 2011) and the 2012 Stockdale Opinion.

line for evaluating the effects of a proposed reallocation of storage is the the project, not necessarily current conditions, and also concurs that this cumulative total of all storage reallocated at the project under the /SA. USACE will complete that legal analysis prior to adopting any S and will document in the ROD, as appropriate, any relevant conclusions.

The Draft FR/SEIS extensively documented the operational changes, impacts her effects of each alternative. In virtually all relevant categories, the ndicated that the effects would be no more than negligible or slightly adverse ovides a comparison of future conditions where withdraws cannot exceed between Alternative 2 and Alternative 8 isolate the impacts that are solely ion at Allatoona (see Appendix D, Attachment 2). Since 2015 several pasin that have been incorporated in the HEC-ResSim model. Changes native ("PAA") that was selected in the FEIS accompanying the 2015 ACT R/SEIS are described in Appendix C, Attachment 1 in Section II on model

dded

torage-Area-updated

- le for Carters Reregulation Pool-updated
- ake-updated
- Ided from FERC license
- adsden Flood Operation-updated
- Junctions-added

ded from FERC license Power Capacity–updated

percentage or other numerical limit on USACE's authority to reallocate Tri-State Water Rights Litigation, 644 F.3d 1160 (11th Cir. 2011) and 2012 ACE disagrees that the storage figures for the RP on their face demonstrate r structural or operational changes, or seriously affect any authorized

cument that the degree of operational change from any final reallocation its effects on other authorized purposes are not "serious"; that analysis, if in the ROD.

omment B and S-06, Comment E.

Commenter	Commontor	Poprosonting	Comment	Comment	Commont	
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	J	3. If the reallocation would not be feasible absent the changes to the 2015 Manual, the Corps' analysis needs to consider those changes too. Finally, the Water Supply Act analysis must consider the aggregate effects and changes to Allatoona Lake since Congress authorized the project in the 1940s. In part, this means the Corps must consider the total effects and changes caused by its 2015 Manual. In 2015, the Corps adopted a new Water Control Manual for Allatoona Lake. By the Corps' own admission, the 2015 Manual was intended to create "substantially higher lake elevations" than historical averages.5 To reach that goal, the 2015 Manual adopted new "action zones" that reduced the storage the Corps could use to generate hydropower, established a new guide curve that reduced downstream flows in dry months, and gave the Corps complete discretion to eliminate hydroelectric generation at any time. The 2015 Manual also reduced flood storage and eliminated navigation support. See generally Plaintiffs Alabama and Alabama Power's Joint Motion for Summary Judgment at 17–20, Alabama v. U.S. Army Corps of Eng'rs, No. 1:15-cv-00696-EGS (D.D.C. filed May 30, 2017) (Doc. 83). Those were major operational changes under anyone's metric. In violation of the original authorizing legislation for the Allatoona Project, the Corps proposes to use the higher lake elevations created by the 2015 Manual to reallocate storage to consumptive uses. But the Corps cannot use the 2015 Manual to two-step around the Water Supply Act. Instead, to the extent that the 2015 Manual's operational changes relate to the TSP's operational changes—and to the extent that the TSP's effects on authorized project purposes exacerbate the 2015 Manual's effects on those purpose— the Corps must consider all such changes and effects in its Water Supply Act analysis. If the aggregate modifications require congressional approval, the Corps has no statutory authority to act.	USACE agrees that before ado discretionary authority under the or operational change or serious prior to adopting any alternative relevant conclusions. USACE r operational changes, impacts to relevant categories, the analysis negligible or slightly adverse (or raised in the ongoing litigation r
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	К	III. The Draft FR/SEIS Is Not Consistent With NEPA For all the reasons already discussed, the draft FR/SEIS's use of the NAA as the baseline for assessing the TSP's effect on the environment is misplaced. NEPA requires that agencies offer "a detailed statement on the environmental impact of the proposed action." 42 U.S.C. § 4332(2)(a). By incorporating into the NAA baseline CCMWA and Cartersville's peak withdrawals in 2007, the draft FR/SEIS overstates the purported baseline and thus understates the impact of the proposed reallocation on the environment and Allatoona Lake's project purposes. See supra, at 8-10; see also FR/SEIS, 5-9, note ("The no action simulation is the NEPA baseline.").	To the extent to which the comr the effects of the water supply v NAA was reasonable, and that i FR/SEIS, the effects of the varie FR/SEIS.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	L	And, as also discussed earlier, the draft FR/SEIS runs afoul of NEPA for the additional reason that the NAA baseline does not align with the PAA selected in the 2015 Manual. See supra, at 10. Alabama highlighted how the mismatch between them works to mask the TSP's effects on hydropower and thus prevented the Corps from performing an accurate Water Supply Act analysis (had it tried to). But the effects being masked are not just to hydropower; in fact, by using an NAA that departs from the PAA, the TSP's effect on just about anything downstream from Allatoona Lake, including navigation, flood control, water quality and water quantity, recreation, and fish and wildlife, is understated.	Since 2015 several changes ha Changes from the PAA which w NAA in the Final FR/SEIS are d A. Richland Creek Reservoir–ad B. Allatoona Lake, Elevation-Str C. Elevation-Storage-Area Tabl D. Pumping Hours at Carters La E. Weiss Bypass Operation–ad F. HN Henry Updates–Gadsder G. Childersburg and Gadsden J H. Harris Operation–updated I. Martin Lake Guide Curve–ade J. Millers Ferry and RF Henry P
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Μ	Take water quantity, for example—a subject which has long been important to Alabama, and which incidentally affects each of the metrics just listed. Under the NAA, the estimated average flow at the state line in Rome, Georgia is 6336 cfs, but is 6353 cfs under the PAA. Thus the impact under the TSP (6320 cfs) is greater when compared to the PAA instead of the NAA. The same can be said for the lowest 7-day flow at Rome, which actually shows an increase from the NAA (738 cfs) to the TSP (751 cfs), but a decrease when compared against the PAA (806 cfs). See Stover Decl. at Exh. 3.6 The problem also is evident with projected elevation levels at Allatoona Lake. Under the NAA, the estimated lowest elevation level is 818.44 ft, is 821.5 ft under the PAA, and 817.3 ft under the TSP. See Stover Decl. at Exhs. 1 & 3. Thus, use of the PAA instead of the NAA as the baseline shows the TSP will cause reservoir levels to be lower, and average state-line flows slower, than the draft FR/SEIS indicates.	The NAA for this ACR Study is information from the APC Coost and Carters ReRegulation dams operations have been incorpora added. These are reasonable a Update/Final EIS. Consequent results for this study effort.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	N	In light of the foregoing, the final FR/SEIS should first use the Baseline Capped alternative instead of the NAA as the baseline in assessing the TSP's environmental impacts under NEPA, but further, should ensure that the Baseline Capped alternative is consistent with the PAA. Where they differ, the final FR/SEIS should explain why those differences exist. Otherwise, there is no meaningful way for the public to easily determine the environmental impacts anticipated under the TSP, other than to know that they are understated.	The differences between the Ba exceedances are allowed to occ the PAA as this includes the 20 has occurred previously.

pting the RP or any other alternative involving an exercise of its e WSA, it must document that such action would not involve major structural isly affect any authorized purpose. USACE will complete that legal analysis e in the Final FR/SEIS and will document in the ROD, as appropriate, any notes, however, that the Draft FR/SEIS extensively documented the o authorized purposes, and other effects of each alternative. In virtually all is in the Draft FR/SEIS indicated that the effects would be no more than or beneficial). The issues raised about the 2015 WCM Update are also relating to the 2015 WCM Update.

ment has merit, the FWOP provides an alternative baseline against which withdrawals could be measured. USACE believes that its construction of the in combination with the FWOP and other alternatives evaluated in the ous alternatives are evaluated and can reasonably be discerned from the

- ave occurred in the basin that have been incorporated in the ResSim model. was selected in the FEIS accompanying the 2015 ACT WCM Update and the described in Appendix C, Attachment 1 in Section II on model updates. dded
- torage-Area-updated
- le for Carters Reregulation Pool-updated
- ake-updated
- Ided from FERC License
- n Flood Operation-updated
- Junctions-added

ded from FERC License Power Capacity–updated

the most accurate representation of the 2015 WCM Update. Updated a and Martin FERC license, revised elevation storage area for Allatoona is, and improved representation of H. Neely Henry and Harris flood ated into it, and the newly constructed Richard Creek Reservoir has been and necessary improvements over the PAA presented in the 2015 WCM tly, the NAA modeling results in the Final FR/SEIS supersedes the PAA

aseline Capped Alternative and the NAA is that no water withdraw cur. The FWOP is used as a comparison to calculate the financial costs of 050 water demand projections. The NAA represents what is occurring and

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	0	Moreover, as the foregoing discussion suggests, a full disclosure of the environmental effects of the current operations should involve an evaluation of the cumulative impact of both the Water Supply Storage proposal and the changes wrought by the 2015 Manual. As the Corps has recognized, the draft SEIS at issue here is "supplemental" to the ETS associated with the Manual, and the two should be analyzed together.	Current system-wide operations FR/SEIS addresses the propose included in the 2015 WCM Upd Regulations (CFR) 1502.9 (c)(1 SEIS for the current study and a
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Ρ	IV. The TSP Exacerbates (Or At Least Does Not Remedy) Existing Water Quality Problems in Violation of the Clean Water Act Another troublesome aspect of the draft FR/SEIS is how it treats water quality problems, both existing and anticipated. When the Corps issued the FEIS for the 2015 Manual, it said that proposed operations would have a "minor adverse" effect on temperature in the Coosawattee, Oostanaula, and Tallapoosa Rivers, and on oxygen demand in the Coosawattee, Oostanaula, and Alabama Rivers. See 2014 FEIS, ES-23, Table ES-5. Further, to the extent that its proposed operations would cause water-quality impairments, the Corps refuted the notion that it had to fix them, instead leaving it to Alabama and Georgia state agencies and downstream users to deal with. Alabama has long argued that the Corps' irrational position on this matter is contrary to its own regulations and its duties to comply with "requirements" under the Clean Water Act, including state water-quality standards. See 33 U.S.C. § 1323(a).	USACE disagrees that the RP (of the CWA. The 2015 ACT Wo raised.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Q	In any event, compared to the FEIS for the 2015 Manual update, the draft FR/SEIS here is much more forthcoming about the water-quality problems in the ACT Basin. At first blush, it appears these problems will get worse under the TSP. For example, the Corps admits that total phosphorous ("TP") levels at Weiss Lake will not meet Alabama's water- quality standards. See FR/SEIS, xxvii. Tt also admits the TSP will cause a slightly adverse effect on water temperature in the Coosa River between Rome and Weiss Lake and in Logan Martin Lake, and on nitrogen levels in Weiss Lake, H. Neely Henry Lake, and Logan Martin Lake. See FR/SEIS, Table 5-1. And, the TSP will have a negative effect on dissolved oxygen ("DO") levels above and downstream of Weiss Lake. See FR/SEIS, xxvii; id. 4-2; id. Appx. B, B-7. By all accounts, the TSP will impair water quality throughout the ACT Basin. The Corps tries to downplay these problems, suggesting they already existed, and pledging that the TSP will not make them any worse. Tn the draft FR/SEIS, for example, the Corps assures that "[t]he reservoirs failing to meet state standards or USEPA acceptable ranges fail regardless of whether Alternative 11 or NAA is implemented." FR/SEIS, 5-39; see also id. (noting that, for chlorophyll a, "temporary exceedances of standards at equivalent concentrations for both the NAA and Alternative 11 would occur.").	There is no practicable alternati purposes and have state water source pollution. See National Wildlife Federation v. Consume
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	R	If these water-quality standards were already being violated—which the Corps implicitly admits they were—then the FEIS for the 2015 Manual did not at all make that clear. That is an issue that may need to be addressed in proceedings regarding that update. But here, the fact that water-quality problems already exist does not justify granting a reallocation which will only solidify those problems. The Corps has an affirmative obligation under the Clean Water Act to make sure that its actions do not cause water-quality standards to not be met. See 33 U.S.C. § 1323(a). That includes making sure that its operations don't force third parties whose NPDES permits are tied to water-quality standards to reduce authorized discharges or else face penalties. The Corps' regulations likewise direct the agency to "protect all existing and future uses" of a river system and "[e]nsure that water quality, as affected by the project and its operation, is in compliance with applicable Federal and state water quality standards." ER 1110-2-8154 ¶¶ 6a, 6b, 8a. Just because the TSP will not make current conditions any worse does not mean current conditions are a satisfactory status quo. That is like saying CCMWA has withdrawn 30% more water from Allatoona Lake than its contract allows, but since it hasn't withdrawn any more than 30% lately, it's not breaching the contract.	USACE has made no inference discharge of pollutants through 402]. Dam-induced changes do Wildlife Federation v. Gorsuch (Power Co., 862 F.2d 580 (6th C at 33 U.S.C §1362(6).
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	S	Finally, the Corps seems to excuse some of these water-quality problems because they apparently will improve over time. In the draft FR/SEIS, the Corps notes that "[i]t was assumed during the [2015] Master Manual update process that, over time, violations of the water quality standards would decrease because of reductions achieved through the CWA." FR/SEIS, 5-64; see also 2014 FEIS, ES-89. To the extent the Corps made this same assumption in this draft FR/SEIS, it should point to the reductions that have actually been achieved.	Revised page 5-64, lines 11 and quality in the ACT River Basin v loads, improved infrastructure, p
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Т	V. The Storage Accounting Methods Should Be Carried Forward One part of the draft FR/SEIS that Alabama (mostly) agrees with is the Corps decision to carry forward its storage- accounting methods—and to reject Georgia's self-serving methods. See FR/SEIS, xxiv. In particular, the Corps has rightly declined to credit users' storage accounts for "made inflows"—water that flows naturally downstream from Hickory Log Creek Reservoir into Etowah River and then to Allatoona Lake. By instead crediting all inflows—both "made" and "natural"—to users on a pro rata basis, the Corps will have the flexibility it needs to operate the reservoir for all project purposes. Moreover, to the extent that Georgia's storage accounting methods consider made inflows from HLCR in determining the size of the proposed reallocation, there would need to be an established plan of operation for that reservoir. The draft FR/SEIS does not contemplate any such plan for HLCR, which is another reason to reject Georgia's request.	USACE concurs that if Georgia would be required for Hickory L and Hickory Log Creek Reserve management of Allatoona Dam
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	U	The Corps is equally right to continue proportionally crediting users' accounts for so-called "return flows"—water that CCMWA withdraws from Allatoona Lake, treats as wastewater treatment facilities, and returns to the reservoir. If those flows were credited solely to CCMWA, then it would essentially result in a "closed loop" that treats water that would naturally flow downstream as instead being the property of CCMWA.7 If CCMWA wants the exclusive right to consume the water it treats at its plants, then it should build the necessary infrastructure to deliver that water directly to its customers.	The State of Alabama's concurr

s are in accordance with the 2015 ACT River Basin WCM Update; the eed operations at Allatoona, Weiss, and Logan Martin lakes, which were not late for the basin (in accordance with Title 33 of the Code of Federal I)). As such, the current operations are identified as the baseline in the are therefore integrated into the complete analysis of the alternatives.

(formerly the TSP) exacerbates existing water quality problems in violation CM Update Final EIS is currently in litigation with some of the same issues

ive that would allow USACE to operate dams for the authorized project quality standards met downstream. Dams do not normally count as point Wildlife Federation v. Gorsuch 693 F.2d 156 (D.C. Cir. 1982); and National er Power Co., 862 F.2d 580 (6th Cir. 1988).

e that it has been violating water quality standards. The CWA prohibits the a point source into a water of the United States [33 U.S.C. §§ 301 (a) and o not qualify as point-source pollution under this interpretation. See National 693 F.2d 156 (D.C. Cir. 1982) and National Wildlife Federation v. Consumer Cir. 1988). 33 U.S.C. §1323(a) is part of the CWA, which defines pollutants

d 12, to remove the word "assumed." It is reasonable to expect that water will improve over time with the implementation of the total maximum daily permitting requirements, and improved land-use practices.

a's storage accounting system was adopted, a similar document to a WCM Log Creek Reservoir. The joint operation of the Allatoona Dam and Lake roir would be described in detail for adequate inclusion in the water

rence with the current USACE storage accounting practice is acknowledged.

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S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	V	One aspect of the Corps' storage accounting practices may require further explanation, however. The Corps appears to have departed from historical practice by proposing, as CCMWA has requested, that when the conservation pool at Allatoona Lake is "full" at 841 ft, all users' storage accounts are likewise considered "full." As the Corps knows, CCMWA actually sued the agency in litigation that remains pending over, among other things, the Corps having declared that CCMWA's storage account was "empty" despite the conservation pool being "full." See generally Complaint at 5, CCMWA v. U.S. Army Corps of Eng'rs, No. 1:17-cv-00400-RWS (N.D. Ga. filed Feb. 1, 2017) (Doc. 1) ("The first principle that is violated is the Corps' rule that all storage accounts must be full when the conservation pool at Allatoona Lake is full."). The Corps did so because of excessive withdrawals by CCMWA. But now, the Corps appears to have heeded to CCMWA's demand here, outside the confines of that litigation. To the extent that the Corps is changing its position on the matter, it should acknowledge that in the final FR/SEIS, and further, should explain the basis for it.	There is no recommended char storage accounts within the Alla which would be either 840 ft or
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	W	From Exhibit A: Declaration of Charles Stover Exhibit 1: Exhibit 1 reflects my analysis and comparison of the impacts on lake elevation at Allatoona Dam and state line flow at the Mayo's Bar, Georgia Gage, for actual historical the No Action Alternative, the Baseline Capped Alternative, the Future Without Project Alternative, and the Tentatively Selected Plan and other proposed alternatives in the FR/SEIS. This exhibit analyzes and compares the impact on elevation levels at Allatoona Lake and state-line flows at the Mayo's Bar, Georgia Gage, for actual historical the No Action Alternative ("NAA"), the Baseline Capped Alternative ("Baseline Capped"), the Future Without Project Alternative ("FWOP"), the Tentatively Selected Plan ("TSP"), and other proposed alternatives in the draft FR/SEIS. Using the math tools in DSSVue, the minimum Allatoona Lake elevation and the average flow were taken directly from the statistics function (see example in Figure 1). The 7-day low flow is computed with the smoothing algorithm set to 7 days, and then read as the minimum from the statistics function. The annual energy is first computed with the time accumulation function set to total energy for each year and then read as the average from the statistics function. While the drop in both average and 7-day minimum flow appear modest, it must be seen that even the Baseline Capped incorporates significant reductions from both historical average and historical low flows. In particular the 7-day low flow in the TSP is reduced by a total of 22% from its historical value. It also is critical to point out that these model estimates are based on assumed rates of withdrawal and return in the year 2050 which will only be verified with the passage of time. Preparers Note: See Exhibit 1 for calculations, tables, graphs.	The model for the ACT River Barsesrvoir projects assumed to be operating rules, modified only a in the simulation. For this ACR serve as a basis for comparison the Coosa River near Rome, Garwas to compare the NAA, as me period. The model does not accomight have been made during a operational adjustments would a historical flows at Mayo's Bar. In Division Commander will have the conference calls. The purposes stakeholders and to receive stat basin. During the 2007-2008 dr drought period is unique and reprojects provide significant flow basin. This practice would conting the the ACR Study incorpor of the results to actual historical the HEC-ResSim modeling report of the results to actual historican the term of the results to actual historican the term.
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	X	 From Exhibit A: Declaration of Charles Stover Exhibit 2: Exhibit 2 reflects my analysis and comparison of the Corps' critical yield analysis performed in 2010 and in 2019. In July 2019, the Corps conducted an updated Critical Yield Analysis for the ACT Basin. See FR/SEIS, Appendix C, Attachment 10 ("2019 Analysis"). The 2019 Analysis updated a Critical Yield Analysis performed in 2010 ("2010 Analysis"). The 2010 Analysis calculated the critical yield at Allatoona Lake without upstream diversions (Method A) and with upstream diversions (Method B). Method A determined the critical yield was 729 cubic feet per second ("cfs"), and Method B determined it was 693 cfs, thus there were 36 cfs in implied upstream diversions. The 2019 Analysis also calculated the critical yield at Allatoona Lake using Method A and Method B. Method A determined the critical yield was 765.34, thus there were 19 cfs in implied upstream diversions. See FR/SEIS, Appx. C, Attach. 10, Tables 2 & 3. Assuming that the 2019 critical yield of 765.34 determined in Method B (with diversions) is used to determine the amount of storage space needed to satisfy Georgia's request for 94 million gallons per day ("mgd") in 2050, then the Corps needs to reallocate an additional 1,301 acre-feet ("ac-ft") of storage space beyond the 52,411 ac-ft proposed. Table 1 above shows that implied upstream diversions decreased by 44% between 2010 and 2019. Assuming that the 36 cfs in upstream diversions from 2010 are assumed in 2019, the additional 17 cfs in upstream diversions would impact the yield analysis and the storage space needed to satisfy Georgia's request 64 y 44% between 2010 and 2019. Assuming that the 26 summarizes the calculations and demonstrates that upstream diversions are a significant factor in determining the storage needed to support a withdrawal of 94 mgd from Allatoona Lake. Preparers Note: See Exhibit 2 for calculations, tables, graphs. 	See response to S-06, Commer

nge to the USACE storage accounting method within the FR/SEIS. All atoona Reservoir are full when the reservoir reaches the summer level, 841 ft, depending on which alternative is selected as the RP.

asin was set up to simulate a 73-year period of hydrologic record with all be in place over the entire period, each project with a specific set of as necessary to meet the prescribed operating conditions of the alternatives Study, the model was not intended to replicate "actual historical" flows or n of "actual historical" flows with modeled alternative flows at Mayo's Bar on A or anywhere else in the system. The principal purpose of the ACR Study odeled, to multiple alternatives to identify differences over the simulation commodate actual operational adjustments to reservoir operations that any given year to respond to extreme conditions. These specific real-time not be reflected in the NAA model results for comparison to observed For example, in periods of severe drought within the ACT River Basin, the the discretion to approve the enactment of ACT Basin Water Management s of the calls are to share ongoing water management decisions with basin akeholder input regarding needs and potential impacts on users within the rought period, the Division Commander enacted drought calls. Each servoir operations vary accordingly. The federal headwater storage augmentation during drought periods, which benefits multiple users in the tinue under the RP. In addition, the 2019 application of the HEC-ResSim orated multiple operational refinements that would make direct comparison I flow records at Rome even less valid. Those refinements are described in ort (daily) in Appendix C.

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S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Y	 From Exhibit A: Declaration of Charles Stover Exhibit 3: Exhibit 3 reflects my comparison of the Corps' model results for the Proposed Action Alternative for the 2015 ACT Manual Update with the No Action Alternative, the Baseline Capped Alternative, and the Future Without Project Alternative. The Water Control Manual for the ACT Basin was updated in 2015 to incorporate changes in operation at the Carters and Allatoona projects. The October 2014 FEIS accompanying the 2015 Manual update selected Plan G as the Preferred Action Alternative ("PAA"). Since no changes in operations have been approved since that time, it is reasonable to expect that the current NAA would be similar if not identical to the PAA that was approved for current operations in the FEIS; however, as can be seen in Table 1 below, that is not the case for any reasonably identifiable metrics. In fact, Allatoona Lake elevation, state-line flow and power output differ when compared to any of the three baseline alternatives presented in the draft FR/SEIS. Data files used in this analysis were provided by the Corps for the 2014 study fileRPlansDFG/simulation.dss and for the current studySimulation_1/simulation.dss. Using the math functions in DSSVue the 2014 I took data points from DSS model simulation file identified as BASE2018—0, BASECAPP—0, and FWOP—0. The minimum Allatoona Lake elevation level and the average flow computed are taken directly from the statistics function. The 7-day low flow is computed with the smoothing algorithm set for 7 days and then read as the minimum from the statistics function. The annual energy is first computed with the time accumulation function set to total energy for each year and then read as the average from the statistics function. Preparer's Note: See Exhibit 3 for calculations, tables, graphs. 	Changes from the PAA that wa NAA in the ACR Final FR/SEIS Changes include: A. Richland Creek Reservoir–a B. Allatoona Lake, Elevation-St C. Elevation-Storage-Area Tab D. Pumping Hours at Carters Li E. Weiss Bypass Operation–ad F. HN Henry Updates–Gadsden G. Childersburg and Gadsden A H. Harris Operation–updated I. Martin Lake Guide Curve–ad J. Millers Ferry and RF Henry F
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	Z	From Exhibit A: Declaration of Charles Stover Exhibit 4: Exhibit 4 reflects my analysis and comparison of hydropower at Allatoona Lake under the No Action Alternative, the Baseline Capped Alternative, the Future Without Project Alternative, and the Tentatively Selected Plan. This exhibit evaluates the loss of energy generated at Allatoona Dam under the TSP. The data points were pulled from DSS model Simulation_1/simulation file identified as BASE2018—0, BASECAP—0, and FWOP—0 provided by the Corps in December 2019 using the math functions in DSSVue. The annual energy is first computed with the time accumulation function set to total energy for each year and then read as the average and minimum from the statistics function. While the average annual loss is 1.7% the drought year of 2007 shows a drop of 10.9%. The loss compared to the FWOP alternative is even greater at 19.1%. Preparer's Note: See Exhibit 4 for calculations, tables, graphs.	Data from all years of the simul Attachment 2). During the actua Instead the operations were foo when demands exceed the pow because the power generation
S-06	J. Brian Atkins, Division Chief	Alabama Office of Water Resources	1/29/2020	AA	From Exhibit A: Declaration of Charles Stover Exhibit 5: Exhibit 5 reflects my analysis and comparison of the observed flows from 2007 to the No Action Alternative and the Tentatively Selected Plan flow simulations at Allatoona Lake. HEC-DSSVue is a software package provided by the Corps to easily view data sets and model results contained in the ResSim models. The HEC-DSSVue was used to analyze the results from the NAA and TSP model runs provided by the Corps. The graph shown in Figure 1 below is a plot of three different flow sets at Rome for the year 2007. The x- axis is time, ranging from January 1, 2007 to December 31, 2007, and the y-axis is flow at Rome, Georgia measured in cubic feet per second (cfs). The above graph shows that during the 2007 drought period, the results from the NAA do not reflect the actual flows observed at Rome. In fact, comparing the red, green, and blue lines from Figure 1 shows that the NAA (NAA BASE green line) and TSP (TSP A11 red line) would produce lower flows at Rome for most of the critical drought of 2007 compared to the flows that were actually observed (blue line) during the 2007 period. To examine the impact to the critical summer period in the drought I used the HEC-DSSVue program to calculate the Rome average daily flow statistics (shown in the "Mean Value" boxes). The data statistics in Figure 2 are calculated from the actual observed flows at Rome for June 1). The data statistics in Figure 3 are calculated from the actual observed now at Rome fuel well west for the period June 1, 2007 to September 30, 2007 are as follows: Observed average daily flow: 1,429 cfs; NAA average daily flow: 1,170 cfs. The difference between the observed average daily flow and the TSP flows for the period June 1, 2007 to September 30, 2007 are as follows: Observed average daily flow: 1,429 cfs; NAA average daily flow: 1,170 cfs. The difference between the observed average daily flow and the TSP flow is also 256 cfs because the NAA average daily flows and TSP average dai	The model for the ACT River Bareservoir projects assumed to be set of operating rules, modified various alternatives in the simul replicate observed flows in any flows with flow conditions for the compare the NAA, as modeled, The model does not accommode have been made in real time du drought conditions in 2007. It is adjusted somewhat under the maddress both in-lake and downs would not be reflected in the N/ the 2019 application of the HEC identified in the HEC-ResSim m simulated flow values for the 2000

as selected in the Final EIS accompanying the 2015 ACT WCM Update and S are described in Appendix C, Attachment 1, in Section II on model updates.

added Storage-Area–updated De for Carters Reregulation Pool–updated Lake–updated dded from FERC License en Flood Operation–updated Junctions–added

Ided from FERC License Power Capacity–updated

ulation are considered in the Hydropower Analysis Report (Appendix D, ual 2007 drought period, releases for hydropower were not the priority. boused on public health and safety. SEPA has the ability to purchase power wer output. The hydropower comparison of this extreme event is misleading in can be incidental to meeting other project purposes.

Basin was set up to simulate a 73-year period of hydrologic record with all be in place over the entire 73 years and all projects operating with a specific only as necessary to meet the prescribed operating conditions of the lation. For this ACR Study, the model was not intended to be used to given year or as a basis for a straight-lined comparison of historic observed ne modeled alternatives. The principal purpose for the ACR Study was to , to multiple alternatives to distinguish differences over the simulation period. date unanticipated operational adjustments to reservoir operations that might luring any given year to respond to extreme conditions, such as the record is highly probable that operations at the Allatoona project in 2007 were most extreme circumstances, in coordination with pertinent interests, to stream water needs. These specific real-time operational adjustments IAA model results for comparison to observed flows at Rome, GA. Further, C-ResSim model to the ACR Study incorporated updates and refinements, nodeling report (daily) in Appendix C, that might also have a slight effect on 007 hydrology compared to actual flow values at Rome, GA.

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Local Government								
LG-01	William R. Henderson, General Manager	Montgomery Water Works and Sanitary Sewer Board (MWWSSB)	12/11/2019	A	The Water Works and Sanitary Sewer Board of the City of Montgomery ("MWWSSB") joins in the State of Alabama's request for extension of time through March 2, 2020, to offer comments on the Corps' Draft Feasibility Report and Supplemental Environmental Impact Statement (Draft FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin. The MWWSSB's intake and discharge points are located on the Tallapoosa and Alabama Rivers, respectively. The Alabama River originates at the confluence of the Coosa and Tallapoosa Rivers. The possible effect on these plants by a reduced flow of waters as advocated by the Corps' draft plan could result in severe and long-time consequences on the operation of these plants. Therefore, the MWWSSB needs this additional time to adequately respond.	Based on a December 18, 2019 notification, the public comment		
LG-02	Glen Davis, Maintenance Director	Cherokee County (AL), Health and Rehabilitation	12/23/2019	A	As a citizen of Cherokee County, I would greatly appreciate your consideration of raising the winter water level on Weiss Lake. This would have a great impact on the local economy and the fish and wildlife in our county.	The RP includes raising the win Final FR/SEIS acknowledges an associated with the proposed in		
LG-03	Terry Calhoun, Mayor	Rainbow City, AL	1/20/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association.)	See Commenter ID # NGO-12 f		
LG-03a	Terry Calhoun, Mayor	Rainbow City, AL	1/28/2020	A	BE IT RESOLVED, that the City Council of the City of Rainbow City, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SEIS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 1. The impact of additional municipal and industrial (M&I) water that will be taken from the Allatoona Lake to supply the Cobb County Marietta Water Authority (CCMWA) and the City of Cartersville, GA; and 2. The impact of the new water accounting requests by the State of Georgia;	The ACR FR/SEIS contains "a f reallocation at Allatoona Lake ar affected downstream areas in th demonstrates that the reservoir downstream flow and water qua accounting methodology was us storage accounting practice. Th the same minimal effects on dow on the storage accounting meth downstream effects of either the		
LG-03a	Terry Calhoun, Mayor	Rainbow City, AL	1/28/2020	В	BE IT RESOLVED, that the City Council of the City of Rainbow City, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SETS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 3. Establishment of flowage easements to accommodate flood operations at Weiss and Logan Martin dams.	The Draft FR/SEIS acknowledg Martin Dam and that USACE wa additional flowage easement wo easements to accommodate the		
LG-04	Brian Muenger, City Manager	Pell City, AL	1/26/2020	A	I am writing to submit comments on behalf of the City of Pell City regarding the proposed changes to the Water Control Manual that impact the Logan Martin Reservoir. The City has reviewed the draft documents and has participated in multiple public outreach meetings on the matter over the past 18 months. After careful consideration, it is the opinion of the City that the proposed changes would be beneficial to our area, and that the proposed winter elevation can be safely achieved, based on the addition of downstream easements that allow for the expedited discharge of water during flood events. As the largest municipality within St. Clair County, the City is home to a large lakefront population, the overwhelming number of which are also in support of the proposed revisions. The higher winter pool will increase recreation opportunities for our residents, and expand the already substantial economic impact created by Lake Logan Martin.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in		
LG-04	Brian Muenger, City Manager	Pell City, AL	1/26/2020	В	The City would request that USACE consider implementing a scheduled maintenance period, to allow residents the opportunity to perform routine maintenance on their docks, seawalls, and other permitted structures located within the flood easement. If this maintenance period were implemented every 3-5 years for several weeks, it would allow residents to properly plan for necessary maintenance to occur.	Most repairs to docks and other winter drawdown period. Owne ft in selected years from APC to		
LG-05	Carroll L. Watson, Mayor	City of Lincoln, AL	1/27/2020	A	For years the City of Lincoln has supported the change in the lake levels. Members of the City Council have met with groups asking for the changes to occur. The changes will provide an opportunity for increased recreation on the lake. Visitors will have greater opportunity to come to the lake. Our residents have requested this change, especially those who live by the lake. The City of Lincoln is on record as supporting this change. The proposed changes to the water levels for Logan Martin Lake represent one of the best actions that may be taken.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in		
LG-05a	Carroll L. Watson, Mayor	City of Lincoln, AL	1/29/2020	A	At the city council meeting held last night a discussion regarding the proposed changes was made with members of the audience. The comments made by those in attendance were very positive. There were no negative comments. As the proposed changes will benefit our residents and businesses the changes should be adopted. The tournament fishing park currently being planned by the city on the lake will benefit from the higher winter water levels and likely make the site a year round tournament site. This tournament site will be the only public access to the lake on the Talladega side of Logan Martin.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in		

P press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic, recreational, and environmental benefits increase in winter pool levels.

for the response to NHLA concerns.

full and complete study" of the impacts of the proposed water storage and the associated reservoir storage accounting practices in all potentially he ACT River Basin. Detailed modeling conducted for the study r storage reallocation at Allatoona Lake would result in negligible effects on ality conditions in the Coosa River in Alabama. Georgia's proposed storage sed in separate modeled alternatives for comparison to the current USACE he model results show that either storage accounting practice would have wonstream conditions in the Coosa River in Alabama. The ultimate decision nodology will be determined based on other factors unrelated to the e current USACE practice or Georgia's proposed method.

ged the APC had already purchased easements downstream of Logan ras refining the results of the flood analysis for the study to confirm whether ould be necessary. The Final FR/SEIS fully addresses the necessary e proposed modified flood operations at Weiss and Logan Martin dams.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and regional economic benefits increase in winter pool levels.

r permitted facilities could continue to be performed during the revised er of such facilities could also request winter drawdowns below elevation 462 o further facilitate dock maintenance.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and regional economic benefits increase in winter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and regional economic benefits increase in winter pool levels.
Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
LG-06	Lesa Osborn, Director	Gadsden Commercial Development Authority	1/27/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association.)	See NGO-12 for the response to
LG-07	Charles Gilchrist, Mayor	City of Glencoe, AL	1/29/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association.)	See NGO-12 for the response to
LG-08	Wally Burns, Mayor	City of Southside, AL	1/28/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association.)	See NGO-12 for the response to
LG-08	Wally Burns, Mayor	City of Southside, AL	1/28/2020	В	(Additional comments to NHLA statement of concerns) The changes would be devastating to many citizens of my City who have water front property on the Coosa River with major loss of property values with unreliable lake levels. The City is developing six acres on the river with two boat ramps, boardwalk, 48 boat slips and a possible restaurant and the proposed changes could have an adverse effect on our development. A recently completed study revealed that the Neely Henry Reservoir has a \$570 million annual positive economic impact to the local communities. Should the proposed changes be implemented, we would expect a significant reduction to the economies of the impacted communities. Our local communities do not need or want the proposed changes. Any help would be greatly appreciated.	HEC-ResSim model simulations project Weiss and Logan Martin elevation at H.Neely Henry rese December through March. The the backwater effect of the Coos the winter level 1–2 percent long current H. Neely Henry operatio minor affect.
LG-08a	Wally Burns, Mayor	City of Southside, AL	1/29/2020	A	BE IT RESOLVED, that the City Council of the City of Southside, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SETS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 1. The impact of additional municipal and industrial (M&I) water that will be taken from the Allatoona Lake to supply the Cobb County Marietta Water Authority (CCMWA) and the City of Cartersville, GA; and Authority (CCMWA) and the City of Cartersville, GA; and 2. The impact of the new water accounting requests by the State of Georgia;	See response to LG-03a, Comm
LG-08a	Wally Burns, Mayor	City of Southside, AL	1/29/2020	В	BE IT RESOLVED, that the City Council of the City of Southside, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SETS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 3. Establishment of flowage easements to accommodate flood operations at Weiss and Logan Martin dams.	See response to LG-03a, Comn
LG-09	Shane Ellison, Chief Administrative Officer	Etowah County, AL	1/28/2020	A	 The Etowah County Commission is opposed to the adoption and approval of the new (2019) USAGE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SEIS) unless and until the completion, and release to the public for evaluation, of a full and complete study of the following: 1. The impact of additional municipal and industrial (m&i) water that will be taken from Allatoona Lake to supply the Cobb County Marietta Water Authority (CCMWA) and the City of Cartersville, Ga.; 2. The impact of new water accounting requests by the State of Georgia; 	See response to LG-03a, Comm
LG-09	Shane Ellison, Chief Administrative Officer	Etowah County, AL	1/28/2020	В	 The Etowah County Commission is opposed to the adoption and approval of the new (2019) USAGE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SEIS) unless and until the completion, and release to the public for evaluation, of a full and complete study of the following: 3. Establishment of flowage easements to accommodate flood operations at Weiss and Logan Martin Dams. 	See response to LG-03a, Comm
LG-10	Kenny Wilbanks, Asst. County Engineer	Cherokee County (AL) Highway Department	1/28/2020	A	We were just emailed this draft for the public comment period for the changes to the control manual for Weiss lake. We have the following concern: The County engineer and I were wondering how this change in the top of the flood pool on Weiss lake from 574' to 572' will affect the existing FEMA flood zone maps. I understand that the upper Coosa is being studied by FEMA and is this part of this ongoing study?	Reducing the top of the Weiss L Management Agency (FEMA) fl maps would be made by FEMA, maps in the upper Coosa River FEMA flood elevation on Weiss (LOMR).
LG-11	Scott Reeves, Mayor	City of Hokes Bluff, AL	1/29/2020	A	BE IT RESOLVED, that the City Council of the City of Hokes Bluff, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SETS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 1. The impact of additional municipal and industrial (M&I) water that will be taken from the Allatoona Lake to supply the Cobb County Marietta Water Authority (CCMWA) and the City of Cartersville, GA; and Authority (CCMWA) and the City of Cartersville, GA; and 2. The impact of the new water accounting requests by the State of Georgia;	See response to LG-03a, Comm
LG-11	Scott Reeves, Mayor	City of Hokes Bluff, AL	1/29/2020	В	BE IT RESOLVED, that the City Council of the City of Southside, Alabama is opposed to the adoption and approval of the new (2019) USACE Draft Feasibility Report (FR) and Supplemental Environmental Impact Statement (SETS) unless and until the completion and release to the public for evaluation of a full and complete study of the following: 3. Establishment of flowage easements to accommodate flood operations at Weiss and Logan Martin dams.	See response to LG-03a, Comm

o NHLA concerns.

o NHLA concerns.

o NHLA concerns.

s conducted for this study show that the proposed flood operation at APC n in the RP would be expected to result in a a negligible change pool ervoir. The greatest difference occurs in the winter high flow months e H. Neely Henry reservoir is drawn down during flood operations to offset as River near Gadsden, AL. Reservoir levels would be drawndown below ger. Drawing the reservoir down during flood operations is consistent with ons. Therefore, this slightly increased duration during the winter period is a

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November 2020

Commenter	Commenter	Popresenting	Comment	Comment	Comment	
LG-12	Robert Sasser and Patrick Sefton	Sasser Law Firm on behalf of Montgomery Water Works and Sannitary Sewer Board	1/29/2020	A	The Montgomery Board has long objected to actions taken by the Corps at Allatoona that impair the adequate flow of water within Alabama. The Montgomery Board has evaluated the Corps of Engineers' Draft feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS") for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Controls Manuals. The Montgomery Board is concerned that the proposed reallocation of additional storage space in favor of Georgia interests will further reduce water flows in the ACT basin causing a variety of environmental concerns and impacts to the Montgomery Board and others in Alabama. This harm includes, without limitation, the degradation of water quality as well as impairment of the Montgomery Board's ability to conduct and rely upon long range planning and analysis. If the reallocation request is formally adopted as proposed in the FR/SEIS, then the Board is concerned that further reductions in water flow may occur that will further affect the Montgomery Board's cost to comply with its National Pollutant Discharge Elimination System ("NPDES") permits particularly during times of drought conditions which the FR/SEIS itself predicts will be increased by the additional withdrawals. See FR/SEIS at xxvi.	HEC-ResSim model simulations reallocation at Allatoona Lake in conditions at the Alabama-Geor FR/SEIS main report and Section have no measurable effect on fl modeling results indicate neglig the proposed Allatoona water st FR/SEIS main report and Section proposed operational changes at the analyses indicated potential extreme drought conditions, the water quality degradation that m acknowledged that extreme dro alleviate critical short-term water revised WCMs specifically addr WCM Update was approved in
LG-12	Robert Sasser and Patrick Sefton	Sasser Law Firm on behalf of Montgomery Water Works and Sannitary Sewer Board	1/29/2020	В	The Corps is required under the National Environmental Policy Act of 1969 ("NEPA") to conduct a thorough investigation and make a forthright acknowledgement of potential environmental concerns. <u>Nat'l Audobon Society v.</u> <u>Department of Navy</u> , 422 f.3d 174,187 (4th Cir. 2005). The Montgomery Board has previously lodged criticism towards the Corps for failing to conduct the requisite hard look at environmental concerns when it adopted the 2015 manuals. See generally, Intervenor-Plaintiff s Joint Motion For Summary judgment at 8-13, <u>Alabama v. U.S. Army Corps of Eng'rs</u> , No. 1:15-cv-00696-EGS (D.D.C. filed June 13, 2017) (Doc.85). It appears this error has been compounded in the FR/SEIS since the 2015 Manuals undisputedly provides for retaining more water in Georgia during the historically driest months of the year. Similar to the shortcomings with the 2015 Manuals, the draft FR/SEIS is not consistent with NEPA.	See the response to LG-12, Co Allatoona Lake on downstream evaluation in the NEPA docume the current ACR Study has bee accordance with USACE planni
LG-12	Robert Sasser and Patrick Sefton	Sasser Law Firm on behalf of Montgomery Water Works and Sannitary Sewer Board	1/29/2020	С	Finally, in 2015, the Corps acknowledged that reduced flows caused by operations under the new manuals may necessitate changes in permit conditions and reevaluation of NPDES permits throughout the basin. As a matter of common sense, additional withdrawals of millions of gallons per day through 2050 will only serve to exacerbate these problems and further amplify the violation of the Corps statutory duty in the ACT basin to comply with states' requirements under the Clean Water Act, including state water quality standards.	See the response to LG-12, Co this ACR Study demonstrate tha downstream flow conditions and
LG-13	Charles E. Hyland, Jr., Director	Mobile Area Water and Sewer System	1/29/2020	A	The Mobile Area Water & Sewer System is a public utility providing water and wastewater services to approximately 230,000 people in Mobile, Alabama and the surrounding area. The Mobile River runs adjacent to our service area and in the past has provided water to some of our Industrial customers. We still have the ability to use it for that purpose in the future if the demand requires us to do so. In addition, the Mobile River is the potential source for a backup drinking water supply for our customers. If water is reallocated and withdrawn upstream of Mobile, it could adversely impact our ability to use the Mobile River as a potential backup water supply for our customers and to provide raw water to industrial customers if demand warrants this use.	HEC-ResSim modeling conduct Allatoona Lake for water supply negligible effect on flow conditio effect further downstream. Moc Coosa River, as evaluated in th projects, but those effects dissip Mobile Area Water and Sewer S Study.
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	A	The Georgia Water Supply Providers strongly support the proposed reallocation of storage in Allatoona Lake to meet the projected 2050 demands of Cobb-Marietta and the City of Cartersville, as requested by the State of Georgia ("Georgia's Storage Request"). By granting this request, the Corps will ensure that Cobb-Marietta, Cartersville, the Atlanta Regional Commission, and the Metropolitan North Georgia Water Planning District can develop plans and supply water to meet the needs of the millions they serve through the most effective, efficient, and environmentally sensitive means available. Reallocating storage in Allatoona Lake is the best alternative by far, by any metric. If the request is denied, the Georgia Water Supply Providers will be forced to pursue alternative projects with much greater economic, social, and environmental impacts.	Thank you for the comment. Th Lake for water supply in lieu of
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	В	Georgia's Storage Request is discussed in the DEIS in conjunction with a separate proposal by the Corps to raise the pool at Allatoona Lake (the "Pool Rise"). The Georgia Water Supply Providers take no position regarding the merits of the Pool Rise, so long as it is evaluated as a discrete proposal independent of the Storage Request.	The ACR Study included a specieither fully or partially from the or conjunction with any separate L not a discrete proposal indepenipool only and from a combination alternatives. Storage reallocation during screening based on potential of the statement of the storage and the storage an

s conducted for this study show that the proposed water supply storage n the RP would be expected to result in a negligible change in flow rgia state line compared to the NAA (see Section 5.1.2.2 of the Final on E.3.2.2.2.2 of Appendix E). The proposed storage reallocation would low conditions in the lower Coosa River. Further, the HEC-5Q water quality tible to minor changes to water quality conditions in Alabama as a result of torage reallocation compared to the NAA (see Section 5.2 of the Final on E.3.3 of Appendix E). USACE acknowledges that, during studies of at Allatoona and Carters lakes for the 2015 ACT River Basin WCM Update, I for slightly reduced flow conditions under certain circumstances. Under slightly lower flow conditions in certain months could result in temporary night require the state to adjust some discharge permits. USACE also bught circumstances might warrant consideration of special releases to er quality issues in coordination with the state and stakeholders. The ress those conditions. There have been no such occurrences since the ACT 2015.

mment A, on the effects of the proposed reservoir storage reallocation at flow conditions in Alabama. USACE conducted a thorough environmental entation for the approved 2015 ACT River Basin WCM Update. Likewise, en the subject of rigorous modeling and environmental analysis in ing guidance and NEPA.

mment A. Detailed modeling and analysis of model outputs conducted for at the proposed reservoir storage reallocation at Allatoona Lake on d water quality conditions in Alabama would be negligible.

ted in conjunction with this study shows that the reallocation of storage in y for the CCMWA and the city of Cartersville in northwest Georgia will have a ons in the Coosa River at the Alabama-Georgia state line and no detectable dified flood operations at APC's Weiss and Logan Martin dams on the ne ACR Study, show minor seasonal effects on flow conditions below these pate by the time they reach the Alabama River near Montgomery, AL. System facilities would not be affected by the actions considered in the ACR

he RP for the ACR Study recommends reallocation of storage in Allatoona other alternative means to meet future needs.

cific alternative to reallocating storage for water supply at Allatoona Lake designated flood storage pool. That alternative was not developed in USACE proposal to raise the pool (guide curve) at Allatoona Lake, and it is indent of the storage request. Reallocation of storage from the conservation on of conservation and flood storage were considered separately in different ion from the flood storage pool only was eliminated from detailed analysis entially significant and unacceptable impacts.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	С	In addition to granting Georgia's Storage Request, the Georgia Water Supply Providers urge the Corps to adopt "Georgia's Storage Accounting" in place of the "Corps' Storage Accounting," which is the system currently in use by the Corps to determine how much of the Conservation Pool in Allatoona Lake is being utilized to store water for each user at any given point in time. There are many reasons to adopt Georgia's Storage Accounting, both legal and prudential. Perhaps the best reason, however, is that the Corps' own analysis shows that Georgia's Storage Accounting performs better than the Corps' Storage Accounting for all federal purposes and objectives—including protection of the environment and downstream interests. Given this, there are many reasons to adopt, and no reason not to adopt, Georgia's Storage Accounting. It would be both arbitrary and capricious and contrary to law for the Corps to fail to do so.	Thank you for your recommenda multiple alternatives that include
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	D	The Georgia Water Supply Providers have discussed storage accounting issues at length in other contexts, including comments submitted on the recently withdrawn Notice of Proposed Rulemaking, Use of U.S. Army Corps of Engineers Reservoir Projects for Domestic, Municipal and Industrial Water Supply, 81 Fed. Reg. 91556 (Dec. 16, 2016) (the "National Water Supply Rule"). The comments to that docket submitted on their behalf, on behalf of the State of Georgia, and on behalf of the National Water Supply Alliance, are attached and incorporated into these comments as Exhibits 1-3. In addition, given indications in the DEIS that the Corps' storage accounting decisions at Allatoona Lake were influenced by the Corps' consideration of the National Water Supply Rule before its demise, we respectfully request that the docket for that rulemaking be incorporated into the administrative record for the current study. I am providing electronic copies under separate cover.	Thank you for the additional info included in the Administrative R
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	E	Regarding the withdrawal of the National Water Supply Rule, we note that President Trump directed the Corps to withdraw it specifically because it threatened to codify the Corps' current storage accounting practices in derogation of State water rights. The Corps' Storage Accounting at Allatoona Lake should be withdrawn, and Georgia's Storage Accounting adopted, for the same reason.	See the response to LG-14, Cor
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	F	 THE "POOL RISE" SHOULD BE EVALUATED AS A DISCRETE MEASURE INDEPENDENT OF THE STORAGE REQUEST Georgia's Storage Request and the Pool Rise proposed by the Corps are discrete elements of the Tentatively Selected Plan that should be evaluated independently. The Water Supply Providers did not request the Pool Rise and should not be expected to pay for it, but otherwise take no position whether it should be adopted. The Pool Rise is discussed in the DEIS as a proposal to reallocate storage "from the flood pool." Water supply storage could never be located in the Flood Pool,1 however. Instead, the procedure is first to raise the Top of Conservation Pool—thus reallocating storage from the Flood Pool to the Conservation Pool—and then to reallocate an "undivided percentage" of the newly-raised Conservation Pool to water supply. The only connection between the Pool Rise and the Storage Request is that they are being studied at the same time. There is no link between them in the sense of one's being proposed to mitigate impacts of the other. To the contrary, the DEIS demonstrates that the Storage Request can and should be granted without raising the pool, and that doing so will have no appreciable adverse effect on lake levels, recreation, hydropower, or any other purpose. DEIS, p. 5-1 Table 5.1. Furthermore, the DEIS shows the benefits and costs of the Pool Rise are the same whether the Storage Request is granted or not, and vice versa. The lack of any interaction between the Storage Request and the Pool Rise confirms that they are discrete measures that can and should be evaluated independently, as required by the Principles and Requirements. 	USACE is required to evaluate a variety of pool levels. This study hydropower and recreation impr only to meet water supply storag Georgia's proposed alternative s storage accounting method. Th water supply request, and there supply users to meet their state- analysis in the Draft FR/SEIS in either storage accounting method. Allatoona Lake and without sign The RP selects the USACE acc practice at Allatoona Lake, when on the USACE methodology for basin inflow to all users but chai that this annual drawdown does an amount of storage that is exp even in the event of severe drou needs will be met. For this reass the RP to most accurately reflec Georgia's water supply request, withdrawal rights as permitted b
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	G	 2. GEORGIA'S STORAGE REQUEST SHOULD BE GRANTED The Georgia Water Supply Providers strongly support granting Georgia's Storage Request to meet critical, long-term water supply needs in an environmentally sensitive and cost-effective manner. 2.1 Storage Should Be Reallocated To Meet Georgia's Projected 2050 Demand The DEIS shows that storage should be reallocated to meet Georgia's projected 2050 water demand. This conclusion holds whether Georgia's Storage Accounting is adopted or not. WS1 (Alternative 3) shows the impact of granting the Storage Request and adopting Georgia's Storage Accounting. WS2 (Alternative 4) shows the impact of granting the Storage Request without Georgia's Storage Accounting. The DEIS shows that neither alternative would have any appreciable adverse impact on any federal purpose or any downstream interest. DEIS, p. 5-1 Table 5.1. 	The RP includes reallocation of The storage accounting aspect accounting aspect of the storage accounting aspect accounting aspect of the storage accounting aspect a

lation regarding storage accounting. The ACR Study has fully considered e Georgia's storage accounting proposal.

ormation. USACE will ensure that documents pertinent to this study are Record.

mment H.

a full array of alternatives to meet water supply needs, including looking at a y is not being conducted to evaluate operational changes specifically for rovements. The 1-ft rise in the summer pool is considered and proposed ge needs, not recreation improvements. USACE has carefully considered storage accounting methodology, but the RP retains the current USACE he RP would fully meet the water supply needs identified by Georgia in its efore does not conflict with Georgia law with respect to the ability of water permitted withdrawal needs from storage allocated in Allatoona Lake. The ndicated that the Georgia users' water supply needs could be met using odology, without requiring any significant changes to the operation of nificantly affecting other authorized purposes or the human environment. counting methodology for a variety of reasons, including current and past re existing water supply storage agreements have allocated storage based r estimating yield. The current storage accounting methodology credits rges the winter drawdown solely to the USACE storage account, ensuring s not reduce the yield of the allocated water supply storage. By allocating pected to provide sufficient yield to meet the users' water supply needs ught, the USACE methodology provides the greatest likelihood that those son, USACE considers the storage amount and accounting methodology in ct the overall water supply benefit that would result from accommodating , while also enabling Georgia water supply users to make full use of their by the state.

storage to meet the full need identified in the State of Georgia request. of the comment is addressed in response to LG-14, Comment H.

Commenter ID	Commenter	Representing	Comment Date	Comment	Comment	
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	Η	 2.2 Georgia's Storage Accounting Should Be Adopted In addition to requesting storage to meet the projected needs of Cobb-Marietta and the City of Cartersville, the State has also requested that the Corps correct certain errors and omissions in the Corps' Storage Accounting. Three points are in dispute: <u>Made inflow</u>: Whether "made inflows" to Allatoona Lake should be "credited" to the persons to whom the State has granted the "exclusive right" to store such flows. The Corps' Storage Accounting fails to do so. <u>Full is full</u>: Whether all conservation storage accounts must be full when the Conservation Pool is full, as determined by the Top of Conservation Rule Curve established by the ACT Master Manual. The Corps' Storage Accounting allows conservation storage accounts to be "empty" or less than full even at times when the Conservation Pool is "full." <u>Proportional Distribution of Inflow</u>: Whether, when inflow is distributed in proportion to storage capacity, the Top of Conservation Rule Curve should be used to determine the capacity of the Conservation Pool. The Corps Storage Accounting erroneously assumes that the Top of Conservation is fixed year-round. These three errors are corrected in Georgia's Storage Accounting. They are discussed below under two headings. The first—made inflow—is a basic question about water rights and the State's authority to allocate them. The second two—"full is full" and "proportional distribution of inflow"—both stem from a discrepancy between the Top of Conservation that is used in the Corps' Storage Accounting and the Top of Conservation established by the ACT Master Manual. Before discussing these issues in detail, we note that Georgia's Storage Accounting is beneficial in every case. Indeed, the only alternative that performs better than the Tentatively Selected Plan is Alternative 13, which is the Tentatively Selected Plan with the addition of Georgia's Storage Accounting. Given this, it would be arbitrar	USACE has carefully considere RP retains the current, USACE needs identified by Georgia in it with respect to the ability of wat allocated in Allatoona Lake. Th water supply needs could be me significant changes to the opera purposes or the human environn reasons, including current and p agreements have allocated stor storage accounting methodolog the USACE storage account, er water supply storage. By alloca meet the users' water supply ne the greatest likelihood that thos amount and accounting method that would result from accommon supply users to make full use of
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	I	2.3 Errors in the Cost Computation Should Be Corrected We have identified three errors in the cost computation for the proposed reallocation. The first two are in the calculation of the Updated Cost of Storage, which is more than twice what it should be. The third is the proposal to charge the water providers "additional costs" to pay for the Pool Rise, which is not appropriate.	The updated cost of storage has address the midpoint of constru Section 7.6.4 of the Final FR/SE
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	J	 2.3.1. Updated Cost of Storage As explained in ER 1105-2-100, the Updated Cost of Storage is calculated by "first computing the costs at the time of construction by subtracting the specific costs from the total construction cost and multiplying the result by the ratio of storage reallocated (ac-ft) to total usable storage space (ac-ft)." See id., p. E-217. "Specific costs" are "the costs of identifiable project features normally serving only one purpose, such as a powerhouse or switch yard." Id., p. E-238. The cost calculated on this basis "is then escalated to present day price levels using the Corps of Engineers Civil Works Construction Cost Index System (CWCCIS)." Id. "Costs are to be indexed from the midpoint of the physical construction period to the beginning of the fiscal year in which the reallocated storage is approved." Id. a) Specific Costs for the Power House Should Be Excluded The cost calculation is shown at Table B.9-4 and described in Section B.9.2.4, p. B-52. Table B.9-4 shows the breakdown of the original cost of construction. The table includes a line item of \$965,000 for the power plant, which accounted for approximately 10% of the original construction cost. As explained above, costs of the power plant are "specific costs" that should be excluded from the Updated Cost of Storage. b) Joint-Use Costs Should Be Indexed from the Midpoint of Construction 1939." This is clearly an error, because the project was not even authorized until 1941. Elsewhere the document identifies 1953 as the mid-point of construction. See DEIS, B-52 § B.9.2.4. Although the Water Provides would be happy to use that date, it also appears to be wrong. The 1962 Water Control Plan provides the following history: Actual construction was delayed because of World War II. Upon cessation of hostilities, steps were immediately taken to start construction and work was initiated 8 February 1946 using hired labor. The contract for construction of the main dam was awarded on 29	The updated cost of storage has address the midpoint of constru Section 7.6.4 of the Final FR/SE

ed Georgia's proposed alternative storage accounting methodology, but the E storage accounting method. The RP would fully meet the water supply its water supply request, and therefore does not conflict with Georgia law ater supply users to meet their state-permitted withdrawal needs from storage he analysis set forth in the Draft FR/SEIS indicated that the Georgia users' net using either storage accounting methodology, without requiring any ration of Allatoona Lake and without significantly affecting other authorized nment. The RP selects the USACE accounting methodology for a variety of past practice at Allatoona Lake, where existing water supply storage orage based on the USACE methodology for estimating yield. The current gy credits basin inflow to all users but charges the winter drawdown solely to ensuring that this annual drawdown does not reduce the yield of the allocated cating an amount of storage that is expected to provide sufficient yield to needs even in the event of severe drought, the USACE considers the storage dology in the RP to most accurately reflect the overall water supply benefit nodating Georgia's water supply request, while also enabling Georgia water of their withdrawal rights as permitted by the state.

as been corrected to exclude the specific power plant cost as well as to uction which is based on January 1948. The revised cost is presented in EIS main report and in Appendix B.

as been corrected to exclude the specific power plant cost as well as to uction, which is based on January 1948. The revised cost is presented in EIS main report and in Appendix B.

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LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	К	2.3.2. The Water Supply Providers Should Not Be Expected To Pay "Additional Costs" for the Pool Rise The DEIS also proposes to charge the Water Supply Providers \$802,000 for "additional costs" related to the Pool Rise. See DEIS, p. 5-52 & 7-21 Table 7-4. The document states that 160,000 linear feet of rip-rap would need to be added, that sixteen docks and 17 beaches would need to be modified, and that Aids to Navigation currently set at elevation 840 would need to be updated. The Water Supply Providers object to this charge. This charge is not appropriate because the items are not "specific costs" of the Storage Request, as discussed in Part 1 above, and because the applicable regulations do not call for such costs to be added, even if they were. The price formula does not provide for any "additional costs" to be added to the Updated Cost of Storage. The Planning Guidance Notebook "specifies the four pricing methods used to determine the cost of water supply storage to the user": (1) revenues forgone, (2) benefits forgone, (3) "replacement costs," and (4) the "updated cost of storage" determined by the "use of facilities method." See ER 1105-2-100, at B-50. The first three methods are different measures of the cost of granting the request. The fourth is the updated cost the government paid to construct the portion of the facility to be contracted to the user. Users are required to pay the highest—not the sum—of the values determined by these four methods. In this case, the price will be based on the Updated Cost of Storage, because this cost is much higher than the impact of granting the Storage Request measured by any of the other three methods. It follows that users paying the Updated Cost of Storage will pay far more than the amount needed to compensate the federal government for any all direct impacts of the reallocation, including any costs to relocate recreation facilities. The Planning Guidance Notebook does not authorize any additional charges. To be clear, additional charges such as those described	USACE is required to evaluate of pool levels. This study is not recreation improvements. Those additional costs are mitig replacement cost account.
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	L	 2.4 The No Action Alternative Should be Corrected It is a challenge to define the correct No Action Alternative for this Storage Request. At least three separate elements require consideration: (1) the projected 2050 water demand if the Storage Request is not granted, (2) the level at which Allatoona withdrawals will be capped, and (3) the non-federal response to fill the gap between projected 2050 demands and the supply available from Allatoona Lake. It is important to get all three elements right. Because the No Action Alternative is the baseline that is used to evaluate the effects of federal action, errors may distort the analysis of effects of the federal action. The errors in the DEIS can be summarized as follows: The No Action Alternative fails to account for the growth in water demand that is projected to occur whether the Storage Request is granted or not. The No Action Alternative fails to consider non-federal projects that will be implemented to meet the projected 2050 demand if the Storage Request is ont granted. The No Action Alternative and the Future Without Project Alternative ("FWOP") should, but do not, make the same assumption about the supply available from Allatoona Lake if the Storage Request is not granted. The DEIS model of the Future Without Project Alternative does not match its description in text. The model depicts water shortages that will not occur under the scenario described in text. Regarding the first three errors, the root of the problem in the DEIS is its failure to recognize that the No Action Alternative and the Future Without Project Alternative as the No Action Alternative in the Final EIS. The fourth error involves correcting the model to be consistent with the text. These errors and proposed solutions are discussed in detail below, after a discussion of the equivalence between the No Action Alternative and the Future Without Project Alternative. While it is important to get these concepts r	The NAA for this study is descri NEPA. The Council on Environ on the subject of the "Forty Mos the NAA should be defined. Fo would mean the proposed activ no action would be compared to forward. The guidance further s predictable actions by others, th analysis." Unfortunately, the sta water supply alternatives to Alla would be not be cost effective, I similar effect on water resource suggested alternatives, which ir as the "predictable actions" des those potential projects to supp realistic and integral part of the associated scope in defining the effectively used the alternative a information) to determine that we consideration. USACE believes project.

a full array of alternatives to meet water supply including looking at a variety conducted to evaluate operational changes specifically for hydropower and

gation measures for project features, which is not included in the

ibed in the context of its applicability to an EIS prepared in accordance with nmental Quality's (CEQ's) March 23, 1981 memorandum to federal agencies st Asked Questions Concerning NEPA Regulations" offers guidance on how or instances involving federal decisions on proposals for projects, "no action" vity would not take place, and the resulting environmental effects from taking to the effects of permitting the proposed activity or an alternate activity to go states "where a choice of 'no action' by the agency would result in his consequence of the 'no action' alternative should be included in the ate and the water supply providers have provided only a general analysis of atoona Lake storage reallocation to demonstrate that the other alternatives likely have other significant adverse impacts, and, in some cases, have a e availability and use in the ACT River Basin as storage reallocation. The nvolve Stamp Creek and Sharp Mountain reservoirs are highly speculative scribed in the CEQ guidance, and virtually no details have been provided on port a credible analysis of environmental and socioeconomic impacts as a NAA. In lieu of USACE speculation on "predictable actions" and their e NAA, the plan formulation process presented in the Final FR/SEIS analysis prepared by the Georgia water providers (along with other vater supply from alternative sources should be eliminated from further s this was the appropriate approach to the study and NEPA analysis for this

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LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	М	 2.5 Hydropower Impacts Are Tallied Incorrectly The DEIS erroneously states dependable capacity under Alternative 3 would be 135,777,856. See DEIS 5-50 Table 5- 16. The correct number, as determined by summing the entries in the Table, is \$138,504,436. 	The transcription error has been
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	Ν	2.6 The Final EIS Should Directly Address the Water Supply Act Criteria The DEIS does not explicitly address the Water Supply Act criteria under 43 U.S.C. § 390b(d), but it should. The Final EIS should explicitly state that the proposed reallocation will not require a "major structural or operational change" or "seriously affect" the purposes for which Allatoona Lake was originally surveyed, authorized, and constructed. Given the absence of any appreciable adverse effect of granting the request, no other conclusion is possible.	USACE agrees that any exercise that such action would not involv purpose. USACE will complete and will document in the ROD, a Draft FR/SEIS extensively docur other effects of each alternative. FR/SEIS indicates that the effect
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	Ο	2.7 The Criteria Used to Classify Impacts as Either "Negligible" or "Measurable, But Not Appreciable" Should be Disclosed For each performance measure, the DEIS labels the impact of the proposed action as either "negligible," "slightly adverse," "slightly beneficial," "beneficial" or "adverse," but it does not explain the basis for these labels. The difference between a "negligible" impact and one that is "measurable, but not appreciable" is unclear. If the distinction is important, the criteria should be disclosed. If it is not, the two categories should be treated as one. This is especially important given that, of all the measures studied, the only impact considered "appreciable" is the beneficial impact of granting the Storage Request.	These terms were specifically de of the effects of the alternatives and socioeconomic resource are matrix, presented in Table 5-1 of provide readers, reviewers, and alternatives compared to the NA impact criteria definitions by sub outputs and other relevant inform supplements the general charact metrics where possible (e.g. dire magnitude in more detail.
LG-14	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	1/29/2020	Ρ	3. ALABAMA POWER COMPANY'S REQUEST Like the Pool Rise, Alabama Power's Request to reduce flood protection in the Coosa River Basin is a discrete measure that should be evaluated independently. The Georgia Water Supply Providers thus respectfully request that Alabama Power's request be addressed in a separate record of decision. The Georgia Water Supply Providers adopt and incorporate by reference the State of Georgia's comments regarding Alabama Power's request. The DEIS shows that the Storage Request can and should be granted whether Alabama Power's request is granted or not.	The proposed APC-modified floo action must include the consider under NEPA (38 CFR 200.4). A system as a whole. However, th request and the APC-proposed a proposed actions would potentia decision maker would have the o unresolved issues.
LG-15	Mike Hackett, Director	City of Rome, Water and Sewer Division	1/31/2020	A	Through out history more severe droughts have been experienced than the 2006 and 2011 droughts. We do understand that is the best data available for the models to have an accurate reading with some reasonable review of projections. From this standpoint, we do not see any information or see where it has been addressed on how this low water flow / release will affect the minimum flows traversing the Etowah River through the City of Rome.	The HEC-ResSim model simulat period of record (1939-2012). The the Final FR/SEIS would have a current conditions (see Section 5 any drought condition experience look like would be highly specula Etowah River and the Carters pr critical flow needs at Rome in the
LG-15	Mike Hackett, Director	City of Rome, Water and Sewer Division	1/31/2020	В	The next concern is that the current release levels and schedules appear to be causing higher velocities along the river through out the City of Rome. We have noted over the past year visual scouring not only along the river banks but also along the bridges and other items being impacted by the operations of the release schedule if this has indeed been modified. We have noted sand bars within the river bed moving as much as 50 to 100 feet within a two week span from the locations that they have been visually observed for years. We did not notice information within the documentation provided that covered any velocities, impacts, notes, etc. along the river system traversing Rome. The only item we noted that pertained to a portion of this section was at the state line with Alabama. Any damages to this could lead to issues for public health, and safety to anyone crossing a bridge, with property adjacent to the river, and or anyone who uses the river(s) as recreation.	There have been no modification being seen in and around Rome of Allatoona Dam. The reallocat water is released from the project well-above normal rainfall in the throughout the winter season, so the storm. For the Allatoona pro- backwater effects on the Oostan along the Oostanaula River. A r Releases from both reservoirs re movement of sand bars might be from the above-normal rainfall. I caused/driven by the high flows completed to determine the dow pool, and the results are present (Economics) in the Final FR/SEI

corrected in the Hydropower Analysis Report (Appendix D, Attachment 2).

se of its discretionary authority under the WSA must have documentation live major structural or operational change or seriously affect any authorized e that legal analysis prior to adopting any alternative in the Final FR/SEIS as appropriate, any relevant conclusions. USACE notes, however, that the umented the operational changes, impacts to authorized purposes, and e. In virtually all relevant categories, the preliminary analysis in the Draft cts would be no more than negligible or slightly adverse (or beneficial).

eveloped and defined to provide a qualitative assessment and comparison modeled and evaluated in the study across a wide range of environmental eas. These descriptors are primarily used in the environmental impact f the FR/SEIS main report and repeated in Table E-51 of Appendix E, to decision-makers with an overall summary of the relative impacts of the A. These general characterizations were based on application of the eject matter experts to their respective resource areas after reviewing model mation. The narrative for each environmental/socioeconomic resource area terization of "effects" by providing more specific information, including ect model outputs), to describe the nature of the effects and their relative

od operation is evaluated independently as Alternative 9. The scope of an ration of connected, cumulative and similar actions to avoid segmentation NPC's request was included to help assess the effects to the Coosa River he RP in the Final FR/SEIS addresses both the Georgia water supply modified flood operations. If residual issues with either one of the ally result in unacceptable delays in final approval of the other action, the discretion to sign a separate ROD and approve the proposed action with no

tions for this current ACR Study were conducted using a 73-year hydrologic The period of record includes the droughts of record in the basin. The RP in a negligible overall impact on flow conditions at Rome, GA, compared to 5.1.2.2). It is possible that a future drought scenario could be worse than the over the modeled period of record. Projecting what that condition might ative at best. However, the presence of the Allatoona project on the roject on the Oostanaula River provide substantial flexibility to address the event of an unforeseen catastrophic drought condition.

ns to Allatoona flood operations to cause the scouring and bar movement , GA. The RP does not include any change in the current flood operation tion of a small portion of flood storage to water supply will not affect the rate ect. Winter/spring of 2019 was warmer than normal temperatures and had northern ACT River Basin. As a result of the above-normal rainfall seen bils were saturated and there were low losses of rainfall into the soil from pject, releases from the lake after the storm were limited to minimize haula River from Etowah River high flows in order to protect Rome, GA record level was reached at Carters Dam and Lake during this period. emained within banks and did not contribute to downstream flooding. The be caused by the extended period of high river levels experienced last year It is likely that the scour and in-channel sedimentation are being resulting from above-average wet seasons. A flood impact analysis was nstream impacts of implementing the reallocation from the Allatoona flood ted in Appendix C (Modeling and Engineering) and Appendix D S

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LG-15	Mike Hackett, Director	City of Rome, Water and Sewer Division	1/31/2020	C	This leads us to our third concern, the impact to the City of Rome's Levee system, which is over 80 +\- years old, and protects a large amount of the City and its surroundings. The Levee system parallels the banks of the rivers and will be impacted not only by erosion but also by any lost storage and extended releases during flood stages. From the City of Rome's data and visual observations over the past few years, the City has been held in flood stage more often and for longer periods of time. This places great stress on the levee system, flood gates, and infrastructure that maintains this protection during flood events. Any impacts on this could lead to danger to the public health, and safety for anyone behind these levees during these events.	The impact of the proposed cha The results of this analysis can be There have been no modification duration of flood in and around f above-average wet seasons. The levels. Periodic monitoring/insp protection system. While the riv above normal, USACE has work conditions. If the RP had been is elevation and duration of high w
LG-16	Rusty Jessop, Mayor	City of Riverside, AL	2/3/2020	A	I would like to render my support for the Lake Level changes currently proposed for Logan Martin Lake in Alabama. The higher lake levels in the winter months will make for a needed increase in commerce, recreational activity, and tourism traffic on this lake.	The RP includes raising the wind of the Final FR/SEIS acknowled associated with the proposed in
LG-17	Lewis B. Jones, Partner	King and Spalding, LLP on behalf of the GA Water Supply Providers	2/7/2020	A	Last Thursday I provided comments on the Draft Feasibility Report for the Allatoona Lake Water Supply Reallocation Study on behalf of the Georgia Water Supply Providers. In that letter, I requested that the docket for the Water Supply Rule be included in the Administrative Record for this action. See Notice of Proposed Rulemaking, Use of U.S. Army Corps of Engineers Reservoir Projects for Domestic, Municipal and Industrial Water Supply, 81 Fed. Reg. 91556 (Dec. 16, 2016) (the "National Water Supply Rule"). My intention is not to elicit any direct response to the comments submitted to that docket, but rather to ensure that entire record is available in the event issues originally considered by the Corps in the context of the Water Supply Rule are eventually decided in the context of the proposed reallocation at Allatoona Lake. Digital copies of the comments submitted on the Water Supply Rule are available on the enclosed thumb drive, along with duplicate versions of the comments submitted by the Georgia Water Supply Providers and the National Water Supply Alliance. I have also included a copy of the Army Corps of Engineers' Engineering and Construction Bulletin No. 2019-13, Methods for Storage/Yield Analysis (CECW-EC, 27 Aug. 19), which we cited in our comments. Because all of these documents were either generated by or have already been provided to the Corps, I am providing them solely for the convenience of your staff. If it becomes necessary actually to compile an Administrative Record for the Allatoona reallocation, I would anticipate requesting inclusion of other documents related to the Water Supply Rule that I do not possess.	USACE acknowledges receipt o does not include establishing a action is to address the State of changes to APC's flood control o administrative record for any fina
NGO						
NGO-01	Linda Ruethemann, Secretary	Logan Martin Lake Protection Association (LMLPA)	11/25/2019	A	Logan Martin Lake Protection Association (LMLPA) speaking on behalf of our membership has supported a higher Winter water level of 462 for many years, We have voiced this request in writing and in person with the Corps on many occasions and are pleased to see movement in this direction. We represent approximately 900+ members. Many of these members live in sloughs/coves that are totally dry during much of the year and 2 additional feet would make a huge difference in their ability to access the water from docks, etc. Also, fishermen often voice their desire to us for the higher level.	Section 5.0 of the Final FR/SEIS increase in winter pool levels at
NGO-02	Mike Riley, Past President	LMLPA	12/6/2019	A	As past President of Logan Martin Lake Protection Association (LMLPA) I want to emphasize my support of the proposed rule curve change regarding the winter water levels at Logan Martin for the same reasons we have set out in previous letters to Federal Energy Resource Commission (FERC): Mainly less erosion of the lake bed and resulting turbidity during storm events, increased habitat potential in areas to be submerged by the additional water, plus increased economic benefit due to increased recreational activity and due to potential increase in land value resulting from better access to the water. Also, the impact on local businesses would have significant value to those businesses and to local governments.	Section 5.0 of the Final FR/SEIS increase in winter pool levels at
NGO-02	Mike Riley, Past President	LMLPA	12/6/2019	В	There is only one reference in the Environmental Assessment (EA) to the US Corps of Engineers participation in interbasin transfers to support water use in Marietta, GA and Cobb County, GA. However, there is no reference to any impact these transfers have on the water quantity of the Coosa Basin and how these transfers might impact any flow requirements, drought issues, etc. Nor is there any indication of what impacts these transfers might have on the rewrite of water control manuals for the reservoirs on the Coosa.	Water withdrawals and returns in transfers) are discussed in Sect E.1.1.6. All withdrawals from, and this study. The MNGWPD has de efficiency programs in the United are mandatory. The principal us CCMWA. The entire water supp and all returns of treated wastew lies in the ACT River Basin and withdraws water from both Allated area. Returns from two wastew Cobb County straddles the ACT distribution system and wastewated from the ACT River Basin to the the Allatoona project and modifi- updates to pertinent WCMs.

anges on the Rome levee was considered during the flood impact analysis. be found in the Appendix C (Modeling and Engineering), Attachment 4. ons to Allatoona flood operations to cause increases in frequency and/or Rome, GA. It is likely that these observed changes are the result of several he recent pattern of above-normal rainfall has resulted in above-normal river bection and routine maintenance are critical components of the levee ver levels in the upper ACT River Basin including the Rome area have been ked diligently to reduce the flooding impact compared to the natural in place over the last 3 years, the Oostanaula and Etowah peak river vater in the Rome area would have been the same.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and regional economic benefits crease in winter pool levels.

of the comments and has considered them; however, the scope of this study nationwide policy analogous to the proposed rule. Rather, the scope of this f Georgia's 2013 water supply request at Allatoona Lake, and proposed operations at Weiss and Logan Martin dams. Any decisions on an nal agency action will be made by USACE, if necessary, in the future.

S acknowledges and documents the benefits associated with the proposed t Logan Martin Lake as described in your comment.

S acknowledges and documents the benefits associated with the proposed t Logan Martin Lake as described in your comment.

in the Georgia portion of the ACT River Basin (including interbasin tion 3.1.1.5 of the Final FR/SEIS and in more detail in Appendix E, Section and returns to, the basin have been included in the HEC-ResSim model for one of the most proactive water planning and water conservation and ed States. Many of its water conservation and efficiency program features isers of water from Allatoona Lake are the city of Cartersville, GA, and the ply service area for the city of Cartersville is within the ACT River Basin, water are to the basin. In the case of CCMWA, a portion of its service area I a portion is in the ACF River Basin (Chattahoochee River). CCMWA toona Lake and the Chattahoochee River to meet the needs of its service water treatment plants in Cobb County are to Allatoona Lake. Because T and ACF river basins, the Cobb County Water System water supply rater treatment operations generally result in a small net transfer of water e ACF River Basin. If approved, changes to reservoir storage allocations at ied flood operations at the Weiss and Logan Martin projects would require

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NGO-02	Mike Riley, Past President	LMLPA	12/6/2019	С	Furthermore, there is no indication of whether there is to be an increase in the quantity of water being transferred. We think it appropriate to point out that the Corps is an active participant with Georgia in its attempt to obtain more water for the Atlanta area, thus our concern that there may be more changes to the water manuals of which we are unaware.	The current water supply reallow CCMWA and the city of Carters B, water is not transferred from evaluates and responds to wate coordination with interested age
NGO-02	Mike Riley, Past President	LMLPA	12/6/2019	D	We have made the Corps aware of our preference for the increased winter water level as part of the issuance of the license and prior to the rewriting of the water manuals. We expressed this preference at both the scoping of several meetings with the Commanding Officer of the South Atlantic Division and the Commanding Officer of the Mobile District of the Corps in St Clair County Alabama and prior letters to the Corps and FERC. The Corps has had ample time to study the issues, especially in regard to the variance granted Neely Henry in 2001, renewed in 2004 and the final variance supported by LMLPA. There has also been ample time for the Corps to gather information regarding the proposed winter elevation at Logan Martin, as this was discussed. There is no mention in the EA that the proposed winter elevations of Neely Henry or Logan Martin would be considered by the Corps after the rewrite of the water manuals.	The H. Neeley Henry Lake guid your comment were approved in process. Those changes are in H. Neely Henry Dam and Lake Lake is included in the RP in the WCM. If approved at the end o Lake WCM will include the incre
NGO-02	Mike Riley, Past President	LMLPA	12/6/2019	E	I respectfully request that a permanent variance to the winter level for Logan Martin lake be granted as soon as possible.	The RP includes the proposed p
NGO-03	Mike Bearden, Board Member	Lake Allatoona Association (LAA)	12/8/2019	A	The report documents the enormous societal value of the project's legislated recreational societal value (\$74 million per year) and has also published the value of the project's hydropower purpose (\$12 million per year). The project's documented recreational value, then is 6 times greater than and unfortunately inversely related (summer season) to Allatoona's hydropower value. Also, from the report's ACT basin-wide data – Allatoona's recreational value is 3 times larger than the entire sum of the report's two studied Alabama reservoirs. In contrast the Allatoona systematic summer season water level drawdown that is detrimental to recreation uses is the direct result of hydropower uses.	Allatoona Lake provides for a ra of the ACR Study does not inclu hydropower.
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	В	Separately - but related - we believe that the State of Georgia's 2018 letter (the "letter") has not evaluated alternate means to best utilize Allatoona for water supply that will do less harm to the public's recreational benefits. Severe summer water supply withdrawal plans would do harm to late summer lake levels and recreational value. With the above paragraphs as context, we provide the following discussion to support the discovered disproportional mismatch of service among these sometimes competing Allatoona water uses (recreational, hydropower and water supply). We submit that it is time for the dramatic historic undervaluation and recent misplacement of Allatoona's recreational purpose to be given an increased new prioritization over a weak hydropower component and the threats of damaging water supply withdrawals.	Allatoona Lake provides for a ra of the ACR Study does not inclu hydropower. USACE operates
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	С	 Accordingly, we request that the USACE make four modest changes to the Allatoona WCM; to recognize an increased importance to recreation purposes; and to establish more stabilized 840 (841) late summer pool levels. The report makes it clear that these changes are possible within the established USACE authority: A. Modify the Allatoona Guide Curve such that Action Zones 2 and 3 downslopes begin two months later (June 1 for Zone 3, and September 1 for Zone 2) and transition to their November and December inflection pointsthus somewhat restricting late summer hydropower releases during low inflow periods. B. Modify Allatoona recreational impact assessments to recognize that adverse summer season recreational impacts begin at 840 (841) water levels. C. Modify the USACE hydropower water-made-availability-procedures-to-SEPA, to give recognition that summer season recreational economic value has 6 times more incremental use than that of hydropower values, thus mitigating normal historical late summer drawdown trends. D. Require a comprehensive analysis to be completed by the State of Georgia before granting the requested 94 mgd increase; to evaluate all feasible non-federal off-channel water supply optionsand to reanalyze water level drawdowns to model changes that would result from changes as a result of changes A-C above. 	The purpose of this study was to purpose of water supply. Chang outside of the scope of this study recommendations are as follows A. The current Allatoona Lake a These action zones were modified this comment are outside the so evaluation of the pending State B. Refer to the detailed respons C. The recommendation in this D. Rigorous analyses of alterna ACT river basins in Georgia over NGO-03, Comment L. For the of reasonable water supply alterna request for Allatoona Lake (see found to be an adequate assess

cation request for Allatoona Lake would address water supply needs for sville through 2050. Except as indicated in response to NGO-02,Comment the ACT River Basin for use elsewhere in Georgia. USACE simply er supply reallocation requests from state and local entities, in full encies and stakeholders.

de curve changes that were the subject of the 2001 variance described in in May 2015 at the culmination of the ACT River Basin WCM update in effect and are reflected in the current ACT River Basin Master WCM and WCM. The proposed increase in the winter pool elevation at Logan Martin ine Final FR/SEIS and in the draft version of the revised Logan Martin Lake of the ACR Study process, the final version of the updated Logan Martin ease in the winter pool elevation.

permanent change to the winter pool level at Logan Martin Lake.

ange of project purposes including hydropower and recreation. The purpose ude consideration of specific operational changes for recreation or

ange of project purposes including hydropower and recreation. The purpose ude consideration of specific operational changes for recreation or Allatoona Lake to balance all project purposes.

to evaluate the effects of a change in operation at Allatoona Lake for the aging specific operations for the sole benefit of hydropower or recreation was dy in regard to impacts on project purposes. Responses to specific vs:

zones were developed during the 2015 ACT River Basin WCM Update. fied to balance the authorized project purposes. The recommendations in cope of the current ACR Study as they do not relate directly to the e of Georgia water supply request.

se to NGO-03, Comment M.

s comment is outside the scope of the ACR Study.

ative sources for water supply have been conducted for the upper ACF and er the last 12 years, including most if not all the alternatives identified in ACR Study, the water supply providers conducted a thorough review of atives specifically applicable to the current State of Georgia water supply e Appendix B to the FR/SEIS). This review was reviewed by USACE and sment of water supply alternatives.

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	D	 Hydropower and Recreation. The report incorporates the importance of its legislated recreation purpose in many places. The report in section 3.1.7, on page 32 specifically calls out Allatoona's \$250 million annual total economic impact based on its 7 million user visits. We are grateful that these significant societal benefits are acknowledged so that that the previously hidden costs from the unintended consequences of competing actions can now be recognized. We believe that these enormous Allatoona recreational values have not yet been factored within Allatoona water management policies and procedures. This now partially acknowledged Allatoona recreational value, after 70 years of lake use, has eclipsed its hydropower value due to two major factors. First, the recreational use of the lake has increased exponentially over the decades since north Georgia was an isolated rural populated region, and is positioned as part of one of the largest US metropolitan urban areas - within one hour's access of some 6 million people. Within that population region, the report shows that the Allatoona basin's population alone has increased 6 fold, and the areas' housing units has increased by 6 fold (Appendix D.3.1, Tables D1 and D8, pages D7-D10). The lake's recreational value has also exploded to a larger multiple of this growth since the 1950's. The report indicates that its annual value of recreational use alone now exceeds \$74 million (Appendix D.6.1, Table D-12 on page 17). And the relative importance of Allatoona's recreation value is illustrated by Appendix D.6.1 Table 12, page D-13 which shows that Allatoona's contribution to ACT is more than 70% of the system's total recreational value. 	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this report that was conducted by Ha provided regarding alternatives Least Costly Alternative other th
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	E	Secondly, as documented in Appendix D, Attachment 2, the characteristics of southeast power supplies has dramatically shifted in the past 15 years (Appendix D, Attachment 2.2, page 9). Gas driven power supply has surpassed traditional coal fired base plant as the predominant source of capacity. Within that shift, gas fired turbine peaking plants have similarly dramatically increased as a significant cost effective source for peak power demands (Appendix D, Attachment 2, Figure 2.3, page 10), and has eclipsed hydropower as a needed peaking source. As a result, the market price and utility of hydropower has significantly decreased from highs over a decade ago. Indeed, today's price of hydropower has fallen to almost 5 cents per KWH (Appendix D, Attachment 2, Figure 2.2, page 9) and is projected to continue to decline in coming decades (Appendix D, Attachment 2, Figure 3.1, page 22). As such, the importance and value of Allatoona's power is a shadowy fraction of its importance and value as compared to recreation, when the decades old Allatoona congressional mandates were formulated for these two sometimes competing uses. Due to higher hydropower value decades ago, the hydropower use was given defaulted footing of priority that resulted in an historical summer season drawdown that conflicted with the then relatively small recreational summer season benefits.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	F	The combination of these two independent factors has resulted in a serious summer season mismatch of assigned priorities for the two (sometimes) competing purposes. Now the summer season recreation value is vastly greater than hydropower use (\$74 vs \$12 million annually). The value of Allatoona hydropower was at a historical high point in the 1950's when electrical power was in short supply, when the value of Allatoona summer season recreational value was at an historical low point. The existing Allatoona operating practices and regulations formulated back then have allowed on extended durations of hydropower releases during summer seasons, without giving recognition of recreation penalties. Those extended hydropower summer season water release practices has resulted in the historical summer water level guide curve drawdown (Appendix A.2, Table 7.1, page 99), to the detriment to recreational values. These adverse recreation impacts (from 4-6 hours of hydropower releases every weekday) occur during the summer season. The guide curve (Appendix A.2, Table 7.1, page 99) also depicts the duration of Action Zones 2 and 3, when this significant adverse hydropower drawdown results in adverse recreational impact during the peak recreational season. The report's Appendix D, Attachment 1, Table 4, page 7 illustrates how the project's recreation purpose is negatively impacted by this outdated devotion to uneconomical extended hydropower releases. Historically, 35% of summer season days are served by 840 full pool levels. Further, projected scenario 11r will cause more suffering to a 9% impact at 835 for 9% of summer days, to increase to a water access deterioration 37% impact for summer days at an 828 elevation.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	G	Further, the report documents how the recreational value impact computations are premised on the three established trigger elevations of 837, 835 and 828 water level elevations (Appendix D, Attachment 1, 2.3, Table 1, page 4). That table asserts that there is no adverse recreational impact above level 837. However, level 840 (nee 841?) is the established recreational summer season "full pool" level from which the 7 million plus visitors arrive expecting to use the lake, and it is clear to any lake user that adverse impacts consistently occur beginning well above an 837 elevation. The report supports this conclusion. Appendix D, Recreation Impact Summary Memorandum Section 2.7, Table 9, page 163.1.75, page 32 represents that each recreational visit has a discreet/quantifiable value of \$12.12 at full pool. But the report verbiage does not recognize that dilution to the Allatoona recreational value occurs with water level drawdowns starting at elevation 840 (nee 841?). Thus the report does not appropriately compute the true negative value of hydropower summer season drawdown impacts to recreationand thus the above contrasting comparisons are actually even more favorable to recreation than indicated. Lake users know that the historical gradual summer season hydropower drawdown from 840 does result in lower recreational value.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this

to evaluate the effects of a change in operation at Allatoona Lake for the nging specific operations for the sole benefit of hydropower or recreation his study in regard to impacts on project purposes. USACE has reviewed the Hazen and Sawyer for the State of Georgia. The information that was sources of water supply are sufficient for identifying the Most Likely/ Next than reallocation of reservoir storage.

o evaluate the effects of a change in operation at Allatoona Lake for the ging specific operations for the sole benefits of hydropower or recreation s study in regard to impacts on project purposes.

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Commenter	Commenter	Representing	Comment	Comment	Comment	
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	н	Separately, the report documents that the USACE decides how to allocate water resources amongst the competing need purposes. However, outmoded restrictions do not allow it to prioritize competing needs at all (Master Manual 7.1). These outdated restrictions do not recognize that 60+ year ago the relationship between the competing summer season hydropower and recreation needs has been dramatically reversed. The summer drawdown contradicts actual present day priorities and that changes need to made to support a stabilized 840 level.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	I	The report (Appendix A.1, Figure a 25, page a 23) includes proposed changes to APC reservoir summer season pool level contingencies, at the expense of hydropower priorities. Such treatment makes clear that the USACE has within its discretion to modernize its practices to improve Allatoona summer season pool level stability and instead it can stop the continuing penalty to Allatoona recreational value from the dedicated summer season water to less value added hydropower uses. As a reference, the recreation use value of the APC reservoirs are mere fractions of the much larger economic value of Allatoona – thus the need for changes to Allatoona is more clear and greater than the APC proposed changes, which are apparently already approved. Since the USACE does have within its established authority, the potential to measurably improve one of its most valuable assets. The report documents that the USACE has the discretion to decide what volume of water is made available for hydropower output (Appendix A3, 7.10, page 7.13), and only after that determination is SEPA allowed to decide its generation schedules and quantities – SEPA does not control summer peak release drawdown amounts, USACE does. Modest changes in internal USACE operational procedures related to these mismatched priorities could result, during normal precipitation years, in a removal of the historical summer months' drawdown below 840. Such changes would be important and could dramatically increase the already large recreational economic impact from Allatoona. Given Allatoona's location within a one hour drive of 6 million (and growing) population it is annually among the one or two most heavily used reservoirs in the country.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	J	In conclusion, a relative priority assigned and recognized to recreation (water levels) versus hydropower releases needs to be established. The summer season 840 (nee 841?) pool level needs to be established as a targeted goal for stability, and that level needs to be recognized as the point where adverse impacts begin for recreation uses. The daily hydropower release durations should be curtailed to match weekly lake inflows to provide for 840 (nee 841?) water level stability during the summer season, as discussed above. The beginning points of Zones 2 and 3 should be slipped two months, to September and June respectively to provide for the weekly operating flexibility to support the 840 flexibility. It is time to fix the outdated inequitable disparities that diminish the whole system value of Allatoona which is hampered by the undue benefit to hydropower at the expense of recreation.	The purpose of this study was to purpose of water supply. Chang were outside of the scope of this
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	К	2. Water Supply and Recreation The report includes the State of Georgia's 2018 ACT request for an increased Allatoona withdrawal to 94 MGD. There are several deficiencies contained within that March 30, 2018 letter (the "letter"). Because of these issues, as outlined below, we believe that the USACE must be prudent before considering implementing operationally changes to support that request. In particular, with reference to the above discussion as to the present day (as opposed to past) Allatoona recreational use value, the letter does not properly address the deleterious effects the letter plan will impose on northwest Georgia summer season recreational quality of life.	The effects of the Georgia wate recreation and pool levels can b
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	L	 a. The letter (and the "report") does not address any notions that other water supply storage options have potential and whether such possible options could or could not be accomplished without doing vital harm to Allatoona summer season recreation use. In particular, no analysis has been done to evaluate any potential non-federal off-stream storage possibilities. The report does acknowledge the existence, but summarily dismisses, only two such alternates (Stamp Creek and Tennessee River). This ignores the likelihood that competitive other options exist. Credible economic/feasibility analysis should be required for all such possible options - before such requests are granted that would cause such a serious deterioration to the Allatoona summer season recreation value. Examples of such possible options could be: Stamp Creek flood overflow storage for pump-out capacities; Allatoona Etowah leg for winter low level flood weir retentions storage pump out capacities; Allatoona Little River leg winter low level flood weir retentions storage pump out capacities; Allatoona Little River leg winter season flood overflows that are an untapped supply for seasonal off-stream storage within such options to augment water supply needs. Such solutions would have zero impact on Allatoona use, and with professional management would provide a sustainable permanent solution to Atlanta's thirst. 	The modeled alternatives have as a result of a storage realloca FR/SEIS. Appendix C contains

to evaluate the effects of a change in operation at Allatoona Lake for the nging specific operations for the sole benefits of hydropower or recreation his study in regard to impacts on project purposes.

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s to evaluate the effects of a change in operation at Allatoona Lake for the nging specific operations for the sole benefits of hydropower or recreation his study in regard to impacts on project purposes.

er request are modeled in alternatives 3, 4, 5 and 8. Specific impacts to be found in Section 5.0 of the Final FR/SEIS.

shown there are minimal impacts to summer lake levels at Allatoona Lake ation. The details of impacts are available in Section 5.0 of the Final additional information regarding impacts to lake levels.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	М	 b. The letter bases its recreation impacts analysis on the assumption that no recreation impact occurs from its summer season withdrawals above the 837 level, but that is in error and adverse recreational impact will be significant. As discussed above, recreational impact actually starts at the summer season full pool 840 elevation level. Any future increased water supply requests should be shaped to support the above discussed changes to allow stable summer season 840 water levels during normal years and be based on such a baseline recreational reference. Even as the letter now stands, it is shown that at a minimum, more than 33% of all summer season days will be seriously effected from the water supply drawdown request. Alternates such as the example in a. above could have less costly effects. 	The recreation impact levels for levels at which increasingly seve the lake (e.g., boat ramps, public 837 ft at Allatoona Lake, there is At lower pool levels, the ability to less accessible for their intended tool for comparing the relative et recreation study of the entire lake
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	Ν	c. The letter should be required to address the overall deleterious effect that the competing summer season increased water supply withdrawals will have on recreation use value. As documented in the report, real and sizeable costs are associated with the Allatoona recreational use – the letter should be required to assess this here-to-fore ignored transfer of society cost to subsidize the water supply utility companies/customers. The letter needs to document as to why and to what degree this cross transfer subsidy is appropriate if alternate options are not possible.	The modeling conducted for this would not have adverse impacts NAA. The water supply provide would be required to pay for the
NGO-03	Mike Bearden, Board Member	LAA	12/8/2019	0	d. The letter should incorporate measures to support the intent of the above discussed recommendations for improved summer season recreational use. Off-stream storage possibilities to store the enormous presently wasted winter season flood flows are obvious ways to mitigate to the requested use of the limited summer season lake water requests that will be such costly detriment to recreational uses.	The purpose of this study was to purpose of water supply. Chang outside of the scope of this study that was conducted by Hazen and alternative sources of water sup other than reallocation of reserv
NGO-04	Jerry Culberson, President	Anglers Unlimited Association	12/10/2019	A	I support less draw down in winter on Weiss and Logan Martin Lakes: (1) water supply - more water for Weiss Lake in winter is needed; (2) more water in winter will help Weiss Lake fishery; (3) more water/ more dilution/ less pollution; (4) flood storage - 6 ft draw down on Weiss Lake is no longer needed with weather forecasting today - maybe in 1960 but not 2020; (5) navigation on Weiss Lake in winter is difficult and dangerous, higher water in winter will help navigation; (6) recreation - more water in winter will allow more Weiss Lake access with boat launch access, currently only a few ramps are usable in winter, opportunities will be greatly improved with higher water level.	The RP includes raising the wint the Final FR/SEIS acknowledge associated with the proposed inc
NGO-04	Jerry Culberson, President	Anglers Unlimited Association	12/10/2019	В	Lake levels - Weiss Lake and all of Cherokee County will benefit from higher lake levels in winter. More access, more recreation, protection of natural fish habitat, economy for Weiss Lake area, water quality will all benefit from higher winter lake levels on Weiss and Logan Martin Lakes.	The RP includes raising the wint of the Final FR/SEIS acknowled associated with the proposed in
NGO-04	Jerry Culberson, President	Anglers Unlimited Association	12/10/2019	С	The best solution for preventing floods in Gadsden, Alabama (Neely Henry Lake) would be to widen "Minnesota Bend" on Neely Henry Lake.	Widening Minnesota Bend on th the ACR Study.
NGO-05	David Fitzgerald (Davison Van Cleve, PC)	Southeastern Federal Power Customers, Inc. (SeFPC)	12/10/2019	A	On behalf of the Southeastern Federal Power Customers Inc., ("SeFPC"), we are contacting you to request a forty-five (45) day extension in the public comment period for the Draft FR/SEIS from the current scheduled public comment deadline of December 30, 2019 in order for the public to provide adequate feedback.	Based on a December 18, 2019 notification, the public comment
NGO-05	David Fitzgerald (Davison Van Cleve, PC)	SeFPC	12/10/2019	В	On November 16th, 2019 SeFPC representatives requested a copy of the ACR Study HEC-ResSim Model Supporting Documentation ("Methodology"). These materials are integral to understanding the modeling utilized by the Corps in developed the Tentatively Selected Plan ("TSP"). As of the date of this extension request letter, SeFPC has not received a copy of the Methodology. At the open house convened earlier this week in Georgia, Corps officials confirmed that the materials had not yet been provided. If and when the SeFPC receives the Methodology, it is estimated that it will take a minimum of three calendar weeks to properly review the methodology and provide adequate feedback. As such, it is necessary for the Corps to extend the comment period deadline beyond December 30, 2019. To withhold the release of the Methodology or provide it with less than three weeks to review and prepare comments prejudices the SeFPC's ability to participate in the NEPA process otherwise required by law.	The link to download the reques meeting in Acworth, GA, on Dec FR/SEIS was extended to Janua
NGO-5a	David Fitzgerald (Davison Van Cleve, PC)	SeFPC	12/19/2019	A	Last week, we submitted a request to extend the deadline to provide comments on the supplemental EIS for the reallocation at Lake Allatoona because our consultant had not yet received underlying work papers. Those materials were provided last Friday. We could still utilize the additional time to review the materials and provide comments on the supplemental EIS. At your earliest convenience, could you please let us know the status of our request to extend the deadline?	Based on a December 18, 2019 notification, the public comment

r Allatoona Lake were established by the project office as threshold pool vere impacts occur to the accessibility and usability of specific facilities on ic docks, and beaches). For example, between pool elevations 840 ft and is no appreciable limitation on access to or use of such facilities on the lake. to effectively use certain facilities becomes more limited and increasingly ad use. The recreation analysis included in the study report is intended as a affects on recreational use among alternatives, not as a comprehensive ke.

s study documents that the proposed water supply reallocation in the RP is on lake levels or the recreational use of Allatoona Lake compared to the ers (CCMWA and the city of Cartersville), and indirectly their customers, e storage in the lake that would be reallocated for their use.

to evaluate the effects of a change in operation at Allatoona Lake for the ging specific operations for the sole benefit of hydropower or recreation were dy in regard to impacts on project purposes. USACE has reviewed the report and Sawyer for the State of Georgia. The information provided regarding oply is sufficient for identifying the Most Likely/ Next Least Costly Alternative voir storage.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5 of es and documents the economic, recreational, and environmental benefits increase in winter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic, recreational, and environmental benefits increase in winter pool levels.

he Coosa River to reduce or prevent flood damages is outside the scope of

P press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

sted information was provided to the requester shortly after the public cember 9, 2019. Shortly thereafter, the comment period on the Draft ary 29, 2020.

P press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

Commenter ID	Commenter	Representing	Comment Date	Comment	Comment	
NGO-06	Roy McAuley, Environmental Chair	Manufacture Alabama	12/10/2019	A	Manufacture Alabama, representing manufacturers in Alabama, many in the ACT-ACR area, respectfully requests a 60 day extension, through March 2, 2020, to offer comments on the Corps' Draft Feasibility Report and Supplemental Environmental Impact Statement (Draft FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the AlabamaCoosa-Tallapoosa River Basin. We request this extension for two reasons. First, the Corps has granted a substantial allocation from Allatoona lake, and Alabama will need to have sufficient time to conduct its analysis of the background data and ResSim reservoir simulation model, which has been requested from the Corps. Second, the Corps has issued the Draft FR/SEIS shortly before Thanksgiving and has set a due date for comments shortly after Christmas. In light of the magnitude of this decision, it will be impracticable to submit comments during the holidays.	Based on a December 18, 2019 notification, the public comment
NGO-07	Blake Hale Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	12/11/2019	A	The U.S. Army Corps of Engineers is now accepting public comments on the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for water allocations from Allatoona Lake for local water supply as well as updates to the water control manuals for the Weiss and Logan Martin reservoirs of Alabama Power Company. On behalf of the Coosa-Alabama River Improvement Association, I write to request an additional 60 days for public comment. Coosa-Alabama is a non-profit organization founded in 1890 to improve and promote the Alabama-Coosa-Tallapoosa River Basin. Our members include local government agencies, large and small businesses, lake associations, and individuals who support efforts to maintain and improve federal, state, local, and private waterway projects that enhance the quality of life for the citizens of our region. We believe an extension is warranted for two reasons. First, the Corps' proposal is based on detailed, extensive, technical information and analysis. The volume and complexity of material warrants an allowance of additional time. Second, the public comment period overlaps with the Thanksgiving and December holiday season. The timing makes an already difficult task that much harder. We believe the Corps' granting of this request will improve the Corps' process of consideration by enhancing the quality of comments you receive from the public.	Based on a December 18, 2019 notification, the public comment
NGO-08	Hugh Stump, Executive Director	Greater Gadsden Area Tourism	1/22/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association. See NGO-12 below.)	See response to NGO-12 on NH
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	A	Coosa-Alabama Supports Alabama Power's Proposals for Higher Winter Pools at Weiss and Logan Martin The people who live in the communities alongside Alabama Power's reservoirs on the Coosa River rely on the lakes in numerous, important ways. Weiss, Logan Martin, and the other reservoirs provide recreation in the form of boating, fishing, and swimming. All of those activities, in turn, are major drivers of economic activity. Tourists and visitors come to the lakes, and they spend money while they are here. The retailers, outfitters, hotels, and restaurants who serve them are major sources of jobs. These lakes provide an attractive setting for residential and commercial structures and helps to maintain and enhance property values throughout the region. Because of Alabama's mild winters, the weather allows for virtually year-round enjoyment of the lakes, as long as the lakes are available at an elevation that is high enough to allow for safe boating and aesthetic enjoyment. Alabama Power's proposal to raise the winter pool at Weiss from 558 feet to 561 feet, and at Logan Martin from 460 feet to 462 feet, and the related operational changes, would extend the availability of the lakes for recreation and make neighboring property that much more valuable. These changes would provide major economic benefits for the region and can be accomplished without a material increase in upstream or downstream flooding based on the extensive studies of these issues as summarized in the Draft FR/SEIS.	The RP includes raising the win Lake to elevation 462 ft (from 46 recreational benefits associated
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	В	We Oppose the Proposed Reallocations for Water Supply. The Proposal Cements and Worsens Operations That Are Negatively Impacting Water Quality in Alabama. We urge the Corps to acknowledge its obligation to ensure its operations do not cause downstream violations of water quality standards, including when the Corps changes operations to hold water upstream in its projects for longer periods of time specifically for support of water supply and recreation.	HEC-ResSim model simulations reallocation at Allatoona Lake in conditions at the Alabama-Geor FR/SEIS main report and Section from the study indicate negligibl proposed Allatoona water storag main report and Section E.3.3 o
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	С	The Proposal Cements and Worsens Operations That Are Negatively Impacting Water Quality in Alabama. The Corps should not approve reallocations for the sake of water supply that cause violations of state water quality standards downstream.	See response to NGO-09, Com
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	D	The Proposal Cements and Worsens Operations That Are Negatively Impacting Water Quality in Alabama. In seeking to satisfy this obligation, the Corps should specifically consider water quality impacts that occur during warmer or low-inflow conditions. In addition to any other data and analysis, the Corps should provide "real time" analysis of low-inflow conditions and not rely exclusively on average flows over longer periods of time. Such an analysis obscures the effects of extreme conditions, which are among our greatest concern.	The water quality modeling proc HEC-5Q modeling report (Appending flow conditions. Flow the dry year simulations. The di- generally found to be negligible. 5-17 of the FR/SEIS main repor 2009, and the differences in flow

9 press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

9 press release issued by USACE Mobile District and subsequent email t period was extended to January 29, 2020.

HLA concerns.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft) and at Logan Martin 460 ft). Section 5.0 of the Final FR/SEIS acknowledges and documents the d with the proposed increase in winter pool levels.

ns conducted for this study show that the proposed water supply storage in the RP would be expected to result in a negligible change in flow orgia state line compared to the NAA (see Section 5.1.2.2 of the Final ion E.3.2.2.2.2 of Appendix E). Further, the water quality modeling results ble changes to water quality conditions in Alabama as a result of the age reallocation compared to the NAA (see Section 5.2 of the Final FR/SEIS of Appendix E).

nment B.

becess is described in Section E.3.3 of Appendix E and in more detail in the endix C, Attachment 3). Water quality modeling was conducted for wet, dry, by conditions in year 2007 (the drought of record in the basin) were used for differences in water quality conditions between the RP and NAA were e. Further, modeled flow conditions near Rome, GA were plotted on Figure by for the NAA and RP for the period from January 2007 through December ow over that period were negligible.

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NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	E	The Proposal Exceeds the Corps' Statutory Authority. The regulations should include specific parameters to identify the extent of reallocations allowed under the WSA and the Corps' own regulations, namely, "15 percent of total storage capacity allocated to all authorized purposes or 50,000 acre feet, whichever is less."	The WSA does not impose a perstorage. The quoted language that the ASA(CW) has delegate ac-ft or 15 percent of the total si for this action is expected to be Secretary of the Army (Civil Wo Under the WSA, the ASA(CW)'s not involve major operational structure purpose. USACE concurs that reallocation decision is not "maj analysis, if applicable, will be do
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	F	The Proposal Exceeds the Corps' Statutory Authority. The Corps should include additional procedures specifically to address and alleviate the extreme circumstances that result from low-inflow conditions. That is particularly imperative here, where the upstream purposes (water supply and recreation) are not among the explicit, Congressionally authorized project purposes, and the downstream purposes that would benefit from supplemental releases (navigation and hydropower) are among those explicitly authorized by Congress.	Water supply and recreation are the WSA and Section 4 of the F the Allatoona project did not spe discretion of USACE how to ope project. Conservation purposes attain balanced operations to ac the maximum extent practicable authorized purposes, and other As far as additional procedures, each DCP is to provide a basic shortage in the ACT River Basin possible actions that might be tu unique issues that may arise. The Drought Management Plan for the support water management deconnected to manage the ACT River consistent with the needs that deconnected to manage the ACT River consistent with the needs that deconnected to manage the ACT River consistent with the needs that deconnected to manage the ACT River consistent with the needs that deconnected the start deconnected to manage the ACT River consistent with the needs that deconnected to manage the ACT River consistent with the needs that deconnected to manage the ACT River consistent with the needs that deconnected the start deconnected to manage the the the deconnected to manage the the the start deconnected to the start deconnected tot the start dec
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	G	The Corps should continue the current practice of crediting return flows proportionally across all users.	The RP would maintain the curr
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	Н	Should the Corps consider offering any credit for return flows, the methodology should ensure "like kind" crediting, such that low-value returns (during high-inflow periods) do not provide credit for high-value withdrawals (during low-inflow periods) of similar volume.	If USACE were to consider full or remain the same during all inflo
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	I	The Corps should not allow greater withdrawals from its project than that provided under the current return flow policy, including specifically on the basis of a temporary impoundment and release from an upstream reservoir.	The position of CARIA on credit recommendation on the credit for
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	J	We are extremely concerned that the Corps' accommodations of local water supply requests lead to withdrawals in excess of contract amounts. We urge the Corps to clearly establish that the Corps will monitor withdrawals under any agreement entered into pursuant to the regulations.	If the State of Georgia's water s provisions to monitor the water
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	к	We urge the Corps to explain how compliance with the agreement is to be measured and determined.	If the State of Georgia's water s include provisions to monitor the
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	L	We urge the Corps to set forth the Corps' procedures upon finding withdrawals to be in excess of amounts authorized under the agreement, including referral to the Department of Justice for consideration of a civil action if deemed to be necessary	If the State of Georgia's water s include provisions to monitor the
NGO-09	Blake H. Hardwich, Executive Director	Coosa-Alabama River Improvement Association (CARIA)	1/29/2020	Μ	We urge the Corps to limit the term of water supply agreements to a term that facilitates periodic review, such as five years, or stipulate that a review of the user's compliance will take place on such an interval.	Federal law provides that when providing water supply storages their use of such storage during contractual obligations (see Put 390c–390f).

ercentage or other numerical limit on the USACE authority to reallocate from ER 1105-2-100 (USACE Planning Guidance Notebook) states only ed authority to the Chief of Engineers to approve reallocations under 50,000 torage capacity allocated to all authorized purposes. The decision maker the Assistant Secretary of the Army (Civil Works), unless the Assistant orks) delegates that authority to a USACE official.

s authority to include storage for water supply is limited to actions that would tructural or operational changes or seriously affect another authorized it must document that the degree of operational change from any final jor" and that its effects on other authorized purposes are not "serious"; that ocumented in the ROD.

e also authorized purposes of the Allatoona project under the authority of Flood Control Act of 1944, Public Law 78-534. The authorizing legislation for ecify allocations or priorities within conservation storage and left it to the erate conservation storage to fulfill the authorized purposes of the Allatoona s are not fundamentally in competition; USACE Mobile District seeks to chieve all authorized purposes and take into account other considerations to e. The Final FR/FEIS documents the operational changes, impacts to reffects of each alternative.

e, each WCM includes a Drought Contingency Plan (DCP). The purpose of reference for water management decisions and responses to water in induced by climatological droughts. This DCP does not prescribe all taken in a drought situation due to the long-term nature of droughts and the primary value of this DCP is in documenting the overall ACT Basin the system of USACE and APC projects; in documenting the data needed to cisions related to drought regulation; and in defining the coordination ver Basin projects' water resources to ensure that they are used in a manner develop during a drought.

rent USACE practice for crediting return flows.

credit for return flows as requested by Georgia, the value of the return would ow ranges.

t for return flows has been noted. USACE will present a final for return flows as requested by the State of Georgia in the Final FR/SEIS.

supply request is approved, the water supply storage agreement will include supply withdrawals.

supply request is approved, the water supply storage agreements will e water supply withdrawals.

supply request is approved, the water supply storage agreements will water supply withdrawals.

state or local interests have contributed or contracted to pay for the cost of space at a USACE reservoir, those state or local interests may continue g the existence of the facility, subject to continued performance of blic Law 88–140, § 1–4, 77 Stat. 249 (Oct. 16, 1963), codified at 43 U.S.C.

Commenter ID	Commenter	Representing	Comment Date	Comment	Comment	
NGO-10	Sarah Stokes, Senior Attorney	Southern Environmental Law Center (SELC)	1/29/2020	A	When describing the direct impacts of low dissolved oxygen, the Corps does not use the best available information. The SEIS argues that the Tentatively Selected Plan (TSP) would have a "minimal effect" on dissolved oxygen (DO) concentrations; however, that is based on an inaccurate assumption incorporated into the Corps' model. SEIS, xxvii.1 The SEIS states, "The TSP model results show a minor decrease in DO from the NAA (No Action Alternative) of 0.16 milligrams per liter (mg/L) downstream of Weiss Lake at the 95 percent occurrence; however, that change is not expected to have a significant impact on water quality." Id. Admittedly, that conclusion is based on the HEC-5Q model. SEIS, Appendix E-219. This HEC-5Q model assumed that Alabama Power's operation of their new blower system would maintain at least a 4 mg/L DO concentration; "[t]he operation of the blower systems to maintain the 4 mg/L DO concentration; "It is an inaccurate assumption; a 4 mg/L DO standard is not being met, even with the blowers. Alabama Power recently responded to FERC with its DO data from the summer of 2018. Even after the blowers were installed, each dam in the Cosa Project is still plagued by alarmingly low DO levels.2 That data revealed that levels dropped below 4.0 mg/L on hundreds of occasions—with levels staying below 4.0 mg/L for up to 17-18 hours at a time.3 Some of these results show DO routinely plunged below the lethal levels of 2.0 mg/L and even 1.0 mg/L.4 Specifically, according to Alabama Power Company, at Logan Martin, the aeration systems increased the total percent of time that DO was above 4.0 mg/L in September.6 In the Weiss development tailrace, the DO drops below 4.0 mg/L in July, 1.8 mg/L in August, and 0.6 mg/L in September.6 In the Weiss development tailrace, the DO drops below 4.0 mg/L at Weiss. A 0.16 mg/L accrease of DO may not be much if the DO is above 4 mg/L, but it is significant if this amount causes the DO to drop below standards or dive even deeper past a point of survival for species. The Corps must	USACE coordinated with the AF blowers at each of the dams are which is located about 1 mile do Henry Dam, and about 300-400 evaluations to determine the co The assumption of achieving th included in the model.
NGO-10	Sarah Stokes, Senior Attorney	Southern Environmental Law Center (SELC)	1/29/2020	В	The direct impacts of lower flow during September through December to aquatic species must be explained. The Corps admits that the TSP will produce lower flow in the Alabama River at the confluence of the Coosa and Tallapoosa Rivers in September, October, and December. SEIS, 5-29. Additionally, at Logan Martin, in dry conditions, flows will be "notably lower than the NAA from September through early January (ranging from 200 cfs to 2000 cfs lower)". SEIS, Appendix E-211. In the dry months, 2000 cfs is a significant amount. The Corps has not determined whether this new flow regime is closer to the natural pattern of flow. The Corps agrees however that "the best strategy for protecting the ecology and biodiversity of the basin, including its protected species, is to maintain or restore to some extent the natural patterns of variability of flow regimes throughout the basin." SEIS, Appendix E-249. This lower flow regime might be detrimental, because it is compounded by climate change, which causes the available precipitation for 2050 to decrease for the entire basin in Alabama, sometimes as high as 43 percent. SEIS, 7-13 – 7- 14. The Corps should compare and describe the proposed flow with the historical natural flow to understand the effects on species and the ecosystem. Further, while the drought management plan is a stop gap to keep conditions from becoming too low in the Alabama River, it was approved as part of the Master Manual and is not currently part of any active FERC license. A flow requirement from the Alabama Power dams must be enforceable to protect the biodiversity in the Coosa and Alabama Rivers.	The annual flow duration curve In the Alabama River at the con would overall be marginal. As a marginally lower in the fall to ea operations as requested by APC pools at those projects. The pri- measurable effect on flow cond projects would be accomplished early winter months. The larger level (reflecting severe drought over an extended period) and re conserve storage. However, Lo through three downstream APC overall effect on Alabama River
NGO-10	Sarah Stokes, Senior Attorney	Southern Environmental Law Center (SELC)	1/29/2020	C	The baseline condition to compute the cumulative impacts is inaccurately described. The Corps relies on the FERC license and its corresponding NEPA analysis to soften the negative cumulative impacts of the Alabama Power Coosa and Tallapoosa River hydropower reservoir management. However, the FERC license was thrown out by the Court. Am. Rivers v. Fed. Energy Regulatory Comm'n, 895 F.3d 32, 37 (D.C. Cir. 2018). For example, the SEIS states more than once that "[t]he environmental effects associated with these ongoing activities are fully described in current FERC licenses and their supporting NEPA documents." SEIS, Appendix E-266-67, SEIS, 5-61. More specifically, the SEIS depends on these NEPA documents to describe the baseline conditions; these NEPA documents "are part of the baseline condition for comparison of the cumulative effects of the TSP." SEIS, Appendix E-267. However, the Court found these NEPA documents "unreasoned and unsupported by substantial evidence." Am. Rivers, 895 F.3d at 37. The SEIS never mentions this. Until these NEPA documents are complete and accurate, the Corps cannot arbitrarily depend on these to form their baseline. This SEIS also disregards the fact that when the Coosa dams were constructed they caused one of the largest extinction events in North America in the 20th century, with the extirpation of nearly 40 species. Rather than describe this past effect, the Corps merely mentions that "[s]ince the USACE and APC projects are already constructed and operating in the basin, most of the major changes to the biological resources of the baseline conditions and determine if this lower flow during the drier months and lower dissolved oxygen will have a cumulative effect on the dozens of listed species throughout the watershed.	The FR/SEIS has been revised operation of the APC Coosa Riv NEPA documentation (see Sec affect the principal purpose of the reallocate storage in Allatoonal reservoirs to the NAA. The alter configurations. The various indi- changes to current reservoir op alternative have been compared effects that would be expected. alternative was not affected by FERC EA (2009) referenced in the ACT River Basin, and USAC relevant and accurate. Even the references material from that do Coosa River. USACE disagrees that the desc not discuss in detail the significa- constructed in the ACT River Ba Appendix E clearly recognize the conditions, even though the rep otherwise widely documented in

PC to obtain data and information on the blowers. The operations for the e based on achieving a DO concentration of 4 mg/L at the compliance point, ownstream of Logan Martin Dam, about 1/4 mile downstream of H. Neely D ft downstream of the Weiss Dam powerhouse. APC has conducted prect set points to achieve the DO concentrations at the compliance points. The 4 mg/L DO concentration at the compliance point for each dam was

(see Figure 5-16 in the Final FR/SEIS) confirms that the differences in flow offluence of the Coosa and Tallapoosa rivers between the NAA and RP stated on page 5-29 of the FR/SEIS, the flows at that location would be arly winter. This would be the direct result of the proposed modified flood C at the Weiss and Logan Martin projects, which included raising the winter oposed water supply storage reallocation at Allatoona Lake would have no litions in the lower Coosa River. Maintaining higher winter pools at those d by slightly reducing hydropower generation at those projects during fall to r discharge differences at Logan Martin Dam at the 90 percent exceedance conditions) highlighted in Figure 5-13 are highly intermittent (not sustained eflect more curtailed hydropower operations under those conditions to ogan Martin discharges, along with additional basin inflow, are managed impoundments before converging with the Tallapoosa River, and the flows would be negligible.

I to acknowledge the litigation and court decision on the FERC license for ver project and ongoing efforts to address issues with the previous FERC stion 2.2). Resolution of pending issues with the FERC license does not his FR/SEIS, which is to evaluate and compare proposed alternatives to Lake and/or to modify flood operations at Weiss and Logan Martin ernatives were simulated using the same data sets and reservoir project dividual alternatives simulated in the study were defined by making specific berating rules in order to achieve study objectives. Model results for each d to the results for the NAA to determine the changes and associated . USACE's comparison of the modeled changes between the NAA and each the current issues with the FERC license that FERC is addressing. The the FR/SEIS was one of many sources used to define baseline conditions in CE found those baseline descriptions in the FERC EA generally to be nough the Court found the FERC EA deficient in some respects, the FR/SEIS ocument determined to be relevant in describing baseline conditions in the

cription of cumulative impacts in the FR/SEIS is inadequate because it does cant changes to pre-dam conditions that occurred when the dams were asin. Section 5.14.1 of the FR/SEIS main report and Section E.3.15.1 of nat significant changes occurred in the Coosa River compared to pre-dam port does not contain a detailed description of those effects that are n existing scientific literature.

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NGO-10	Sarah Stokes, Senior Attorney	Southern Environmental Law Center (SELC)	1/29/2020	D	The cumulative impact of high Phosphorous and Chlorophyll a is not minimal. The SEIS admits that under the TSP, the site will fail to meet Total Phosphorous water quality standards under most conditions. In fact, with the proposed alternative, the Total Phosphorous is almost 100 times what the EPA recommends. SEIS, Appendix E-223. However, the SEIS concludes that these are only "minor cumulative effects". SEIS, Appendix E-271. The cumulative impacts cannot be minor if the site fails to meet Total Phosphorous water quality standards under most conditions. The SEIS also concedes that currently and under the TSP, chlorophyll a concentrations in the Coosa River fail to meet water quality standards at the 95-percent occurrence interval. Even if chlorophyll a standards are violated only under low-flow conditions, this could be one-fourth of the year since the SEIS states that the flow at Logan Martin and at the Alabama River will be lower September through December. SEIS, 5-64; SEIS, Appendix E-211. The SEIS must do a better job at explaining how these are only minimal cumulative effects. Cumulative impact is the impact on the environment "when added to other past, present, and reasonably foreseeable future actions studied in this SEIS causes the Phosphorous or Chlorophyll a to be high, the high Phosphorous and Chlorophyll a is still a significant cumulative impact when it is added to what is currently there, and it should be described as so.	While the cumulative effects of a chlorophyll a concentrations in the addressed in the FR/SEIS on the does not meet the water quality concentrations under the RP are The same is true of the chlorophalternatives, including the NAA. and the RP, which is why the FF clarifying language to the cumula and Appendix E (Section E.3.15)
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	A	The Draft FR/SEIS contains gaps in Corps' approach that are without explanation. Specifically, SeFPC believes Corps failed to identify the applicable Engineer Regulation in support of the Agency's proposal to reallocate flood storage in Allatoona Lake to water supply storage.	USACE has the authority to real under the WSA, as long as it do the project purposes (43 U.S.C. USACE implements the WSA.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	В	Further, SeFPC believes Corps analyzed an improper baseline, and must issue a supplemental environmental impact statement in light of information disclosed in the ongoing Civil Action No. 1:17-cv-00400-RWS. Unless remedied, these unexplained disparities will result in an arbitrary and capricious final action by the Corps in violation of National Environmental Policy Act ("NEPA").9/	The Final FR/SEIS and ROD will made.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	С	SeFPC does support the Corps' decision to apply the Agency's storage accounting methodology rather than the State of Georgia's proposed storage accounting methodology.10/ Nonetheless, SeFPC is concerned that the final environmental impact statement ("EIS") and record of decision ("ROD") could deviate from the conclusions that the Corps has reached in determining that the current storage accounting methodology should be used for the proposed reallocation. These concerns are detailed below. As such, if the Corps includes the state of Georgia's storage accounting methodology in the final EIS and ROD, the Corps must supplement the Draft FR/SEIS before moving forward with the final EIS and ROD.	The Final FR/SEIS and ROD wil made.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	D	The Corps' failure to identify any legal authority in support of the reallocation project is arbitrary and capricious. Historically, when executing similar reallocation projects as the one at issue here, Corps cites to the Agency's own Engineer Regulations as a source of legal authority to make such decisions. While the Engineer Regulations are, at best, internal guidance rather than binding Agency rules, they are formed on the foundations of legal authority granted to the Corps by Congress.11/ In the proposed reallocation, the Corps fails to cite applicable legal authority in making its decision to reallocate Flood Storage at Allatoona Lake to water supply. Failure to cite the applicable legal basis in support of a reallocation that uses Flood Control is a violation of NEPA. Because NEPA itself does not contain a mechanism for judicial review, NEPA decisions are reviewed pursuant to § 706 of the Administrative Procedure Act ("APA"). The APA specifies that a reviewing court shall "hold unlawful and set aside agency action, findings, and conclusions found to bearbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law."12/	USACE has the legal authority to provides additional procedural g reallocations that affect flood sto
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	E	The Corps is statutorily prohibited from utilizing nonfederal dams to meet the Agency's statutory mandates under the Water Supply Act ("WSA") of 1958. Accordingly, "Congress provided that storage at Corps facilities could be allocated to [municipal and industrial] water supply without congressional approval if this reallocation did not seriously harm authorized project purposes or involve major structural or operational changes."13/ Therefore, as acknowledged in the Draft FR/SEIS, "[u]nder the WSA, if the recommended plan constitutes a major operational change to a federally authorized project purpose or causes a serious effect it would require additional Congressional authorization."14/	USACE agrees that, under the V authorized project purpose or ca congressional authorization. The authorized purposes, and other in the FR/SEIS indicates that the beneficial). The details can be for
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	F	Corps may not include nonfederal projects in assessing whether Alternative 11 constitutes a major operational change or causes a serious effect to federally authorized projects. Nevertheless, Corps includes both federal and nonfederal reservoirs in establishing the affected environmental baseline condition for the project.15/ In doing so, Corps evaluated an improper baseline and failed to meet its statutory mandate under the WSA.	Allatoona Lake was intended to Acts of 1941 and 1944. Howeve the USACE and allowed the dev would retain certain rights for flo nonfederal reservoirs in establis Allatoona Lake and the rest of th

all current and past activities in the basin on total phosphorus (TP) and the reservoirs are not minimal, the additional effects of the proposed actions nose concentrations would be negligible to minor. The TP concentration *x* standards under the alternatives, including the NAA. The TP re similar to the NAA, which is why there are only minor effects from the RP. hyll a concentrations, which respond in a similar manner under all . There is little difference in chlorophyll a concentrations between the NAA R/SEIS states there are only minor effects. USACE has added some lative impacts discussion in the Final FR/SEIS main report (Section 5.14) 5) to highlight the high TP and chlorophyll a concentrations under the NAA.

allocate existing storage space to municipal and industrial water supply bes not involve major structural or operational changes or seriously affect . § 390b and e). ER 1105-2-100 provides additional guidance on how

ill fully document and explain the rationale for any final decision that is

ill fully document and explain the rationale for any final decision that is

to reallocate storage for water supply under the WSA. ER 1105-2-100 guidance on how USACE implements the WSA, including potential orage.

WSA, if the RP constitutes a major operational change to a federally auses serious effects to authorized project purposes, then it would require the FR/SEIS extensively documents the operational changes, impacts to reffects of each alternative. In virtually all relevant categories, the analysis the effects would be no more than negligible or slightly adverse (or found in Section 4.0 and Section 5.0 of the FR/SEIS.

operate as part of a federal system when authorized in the Flood Control er, the Coosa Power Act took the authorization for parts of the system from velopment and construction by private entities with the caveat that USACE bod risk management. Therefore, USACE included both federal and shing the affected environmental baseline condition, taking into account how he Coosa River system was authorized.

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NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	G	The blatant disregard for the limitations of the Corps' authority in the WSA by modeling private projects that are separately licensed by the Federal Energy Regulatory Commission ("FERC") reveals a shocking disregard for the rule of law by Corps representatives. First, there is nothing in the WSA that indicates that the evaluation of project purposes shall include project benefits at projects that are not under the control or jurisdiction of the Corps. A privately operating project remains within the purview of the permitting and licensing authority vested in FERC by Congress under the Federal Power Act. Here, the Corps has included eleven FERC licensed projects owned and operated by the Alabama Power Company ("APC") to support the conclusion that there is a de minimis impact on hydropower associated with the proposed reallocation.	Allatoona Lake was intended to Acts of 1941 and 1944. Howeve the Corps of Engineers and allow that USACE would retain certain federal and nonfederal reservoir USACE is required to evaluate in projects. The Hydropower Analy projects and non-federal project values from Alternative 8, as the supply.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	Η	Fundamentally, the Corps makes a grievous conclusion in considering the output of hydropower from a Federal project on par with hydropower from a private project. To state the obvious, the Federal government does not market the output from private projects in the ACT river basin. Moreover, Congress did not authorize the Corps to construct the private projects in the ACT River basin. The authorized benefits to be considered under the WSA are confined to those purposes that Congress has authorized the Corps to manage. There is no legal basis for the Corps to conclude that benefits as set forth in the WSA should include benefits outside of the statutory jurisdiction of the Corps. To do so, renders the conclusions reached in the Draft FR/SEIS arbitrary and capricious, and blatantly in disregard of existing law.	Allatoona Lake was intended to Acts of 1941 and 1944. Howeve USACE and allowed developme retain certain rights for flood risk reservoirs in evaluating the syste evaluate impacts to hydropower Hydropower Analysis Report (Ap non-federal projects. The hydrop Alternative 8, as the alternative
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	I	Looking behind the arithmetic used for determining the baseline, we also note that on page 54 of Appendix B, the Corps double counted the existing Cartersville and Cobb-Marietta Water Storage contract already properly in place. The total useable storage (including Flood Control) is 558,853 ac-ft. Of this amount 18,539 ac-ft are already under contract with Cartersville and Cobb-Marietta. Therefore, the remaining Total Storage available for reallocation is 540,314 ac-ft. This error affects the calculation of the overall Cost of Storage and should be revised accordingly.	The USACE bases the percent of conservation volume added to fluthe USACE Water Supply Hand
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	J	SeFPC supports the Agency's application of Corps' storage accounting methodology in Alternative 11. Nevertheless, SeFPC must express its concern over a scenario in which Corps adopts the state of Georgia's storage accounting methodology in its final EIS and ROD. Accordingly, adopting Georgia's storage accounting methodology rather than Corps' storage accounting methodology in the final EIS and ROD without disclosing it in the Draft FR/SEIS would constitute a substantial new change. As such, Corps would be statutorily required to prepare a supplemental EIS pursuant to 40 CFR 1502.9(c)(1)(i)-(ii): [Agencies][s]hall prepare supplements to either draft or final environmental impact statements if[t]he agency makes substantial changes in the proposed action that are relevant to environmental concerns; or[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. An agency makes a substantial change to a proposed action if the change "presents a seriously different picture of the environmental impact' of the agency's action."16/ The Corps' decision to adopt the state of Georgia's storage accounting methodology in the final EIS and ROD would be a major federal action and would thus constitute a substantial change. Therefore, Corps would be statutorily obligated to prepare a supplemental EIS. Failure to do so is arbitrary, capricious, an abuse of discretion, and otherwise not in accordance with the law.	The Draft FR/SEIS evaluated a ladopt Georgia's proposed storage operational changes associated of each alternative.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	К	As required by NEPA procedures and CEQ regulations, Corps must issue a new supplemental EIS in light of the confirmed discrepancy between the Draft FR/SEIS and Corps' Legal Analysis referenced in Civil Action No. 1:17-cv-00400-RWS. Failure to do so violates NEPA and will ultimately render the Agency's decision arbitrary and capricious. Additionally, there are limitations on Agency actions during NEPA processes. Specifically, "until an agency issues a record of decisionno action concerning the proposal shall be taken which would[h]ave an adverse environmental impact[or] [I]imit the choice of reasonable alternatives."22/ Here, Corps is clearly taking action concerning the Draft FR/SEIS by by virtue of the litigation with the Cobb County-Marietta Water Authority. According to the Eleventh Circuit, 40 C.F.R § 1502.9 must be "[r]ead in light of the 'rule of reason,''' and in doing so, "additional information need only be accounted for if the information would have been useful to the agency's decision making process."23/ Undoubtedly, the information resulting from the Cobb County-Marietta Water Authority litigation will inform the Corps' decision making process. As of the submission of these comments—approximately ten weeks after the November 26, 2019 joint motion to stay was filed—Corps has not provided any information regarding the identified contradiction between the Draft FR/EIS and the Legal Analysis, nor whether it has been resolved. As defined above, the confirmed discrepancy is a significant change and a major federal action. As such, Corps must provide a supplement the Draft FR/SEIS in order to comply with NEPA and CEQ regulations. Failure to do so is arbitrary, capricious, an abuse of discretion, and otherwise not in accordance with law.	The FR/SEIS is consistent with, addresses specific legal questio accounting methodologies, while different storage accounting met Draft FR/SEIS was posted to the https://www.sam.usace.army.mi Reallocation-Study-and-Updates Manuals/ACR-FAQ/#question24

o operate as part of a federal system when authorized in the Flood Control ver, the Coosa Power Act took the authorization for parts of the system from owed the development and construction by private entities with the caveat n rights for flood risk management. Therefore, the Corps included both irs in evaluating the system and the effects on the system as a whole. impacts to hydropower as a system including both federal and non-federal lysis Report (Appendix D, Attachment 2) separates out impacts to federal ts. The hydropower benefits and revenues foregone for the RP used the e alternative isolates the cost to hydropower as a result of changes in water

o operate as part of a federal system when authorized in the Flood Control ver, the Coosa Power Act took the authorization for parts of the system from ent and construction by private entities with the caveat that USACE would k management. Therefore, USACE included both federal and nonfederal tem and the effects on the system as a whole. USACE is required to r as a system including both federal and non-federal projects. The appendix D, Attachment 2) separates out impacts to federal projects and power benefits and revenues foregone for the RP used the values from isolates the cost to hydropower as a result of changes in water supply.

of usable storage on the total usable storage, which is defined by flood control volume. These calculations are specified in ER 1105-2-100 and dbook.

broad range of reasonable alternatives, including alternatives that would age accounting methodology. The Final FR/EIS thoroughly documents the d with the RP, its impacts on authorized project purposes, and other effects

, and does not contradict, the Legal Analysis. The Legal Analysis ons regarding the USACE authority to consider and adopt different storage le the FR/SEIS evaluates the effects of different alternatives, some including ethodologies. Additional information regarding the Legal Analysis and the le following website in December 2019:

il/Missions/Planning-Environmental/Allatoona-Lake-Water-Supply-Storages-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-4

Commenter ID	Commenter	Representing	Comment Date	Comment	Comment	
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	L	Selection of Alternative 11 in the Final EIS and ROD requires Corps to update the Allatoona and ACT Water Control Manuals. The Water Control Manuals are essential policy documents that "outline the regulation schedules for each project and specifications for storage and releases from each reservoir."32/ Further, "[t]he purpose and need for updating the Water Control Manuals is to determine how the federal projects in the ACT Basin should adjust operations for their authorized purposes in light of current conditions and applicable law."33/ As such, in order to "comply with existing Corps of Engineers regulations and reflect operations under existing congressional authorizations,"34/ Corps must update the Allatoona Water Control Manual if Alternative 11 is chosen in the Final EIS and ROD. On May 4, 2015, Corps approved the updated Master Manual and project WCM's for the Alabama-Coosa-Tallapoosa River basin.35/ The Water Control Manual currently specifies that Allatoona Lake has a normal pool elevation of 840 ft.36/ More specifically, the "[t]he top of the conservation pool at Allatoona Lake is at elevation 840 ft during the late spring and summer months (May through August); transitions to elevation 835 ft in the fall (October through mid-November); transitions to a winter drawdown to elevation 823 ft (January 1-15); and refills back to elevation 840 ft during the winter and spring wet season."37/ However, Alternative 11 requires the reallocation of "an additional 33,872 ac-ft of reservoir storage at Allatoona Lake from its current purpose(s) to [municipal and industrial] water supply."38/ Further, "[t]he reallocation would come from a combination of flood storage (11,670 ac-ft) and conservation storage (22,202 ac-ft)."39/ As a result, "[t]he summer guide curve elevation [will] be raised from 840 ft to 841 ft and the winter guide curve elevation [will] be raised from 840 ft to 841 ft and the winter guide curve elevation [will] be raised from 840 ft to 841 ft and the winter guide curve elevation [will] be raised f	The ACT River Basin Master M to reflect the changes identified FR/SEIS. These manuals reflect FR/SEIS.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	М	The SeFPC respectfully request Corps please explain whether the improvement in the Agency's Critical Yield calculation between 2010 and 2019 is attributed solely to the reallocation of storage from Flood Control to Conservation. Accordingly, in the 2019 report, to calculate the Critical Yield at Allatoona Dam, Corps applied 2007 as the Critical Drought Year and Corps' Method A, resulting in 784.4 cubic feet per second ("cfs"). 43/ However, in the February 2010 Critical Yield Analysis, Corps calculated the Critical Yield at Allatoona Dam to be 729 cfs, again using 2007 as the Critical Drought Year and applying the same method, there is a 55.4 cfs difference between the February 2010 and the November 2019 Critical Yield calculation. SeFPC respectfully requests the Agency provide an explanation for the difference in calculations.	The 2019 Allatoona Critical Yiel Lake elevation-storage volume ranges performed in 2010. Area the lake. The effects of sedime summer pool level (840 ft) from ac-ft to 192,381 ac-ft, at the bot top of flood storage (860 ft) fron HEC-ResSim representation of powerhouse leakage should not from the HEC-ResSim Yield mot Yield Report.
NGO-11	Alan Williford, Chairman, Water Storage Reallocation Committee	Southeastern Federal Power Customers, Inc. (SeFPC)	1/29/2020	Ν	The SeFPC respectfully requests Corps please explain the discrepancy between the Individual Dependable Capacity Benefits for Allatoona Lake in the October 2014 Final EIS Update of the Water Control Manual for the ACT River Basin and the November 2019 Draft FR/SEIS. According to the October 2014 Final EIS, the Individual Dependable Capacity Benefits for Allatoona Lake are calculated at approximately \$5 million annually for the No Action Alternative, unselected alternatives, and the proposed action alternative.45/ However, in the Draft FR/SEIS, the Individual Dependable Capacity Benefits for Allatoona Lake are calculated at over \$9 million for the No Action Alternative, unselected alternatives, and Alternative 11.46/ As such, SeFPC request Corps provide information regarding the Agency's calculations for the Individual Dependable Capacities so as to better understand the substantial difference between the 2014 and 2019 results.	There are several factors that h Final EIS and the Final ACR FR 1. A significant factor in the cost reflect changes in technology. It oupdate costs indexed in the F 2. A comparison of Allatoona's River Basin WCM Update and N studies' base case capacities at the Water Control Manual for the differences. 3. The average availability met Hydropower Analysis Report (A
NGO-12	Kelly Stephens, Board Member	Neely Henry Lake Association	1/29/2020	A	The Neely Henry Lake Association is concerned that the increased discharge of water from Weiss Lake during flood events (i.e. releasing more water sooner because of the higher lake elevation) will adversely impact Neely Henry Lake. Specifically, we are concerned about the possibility of increased flooding above a natural restriction in Neely Henry reservoir known as "Minnesota Bend," which significantly impacts the city of Gadsden, and the evacuation of water below "Minnesota Bend." The evacuation of water below "Minnesota Bend" leads to very low water conditions in the Rainbow City and Southside areas in Etowah County and various communities in St. Clair and Calhoun Counties. We are concerned that more drastic and frequent flooding and evacuation of water could occur and for longer periods of time if the proposed changes to the Water Control Manual are adopted. Should this be the case it could result in various environmental and safety-related issues. In addition, it could cause property damage and a decrease in property values in the impacted areas.	The proposed modified Weiss p portion of surcharge flood stora operation would release more w greater than 569 ft), during this from the spillway to just upstrea would have occurred under natu Lake do not indicate more drast occur and for longer periods of

anual and Allatoona, Weiss, and Logan Martin WCMs have been updated I in the RP. The updated manuals are found in Appendix A of the Final ct the changes to elevations and storage values as prescribed in the Final

Id analysis includes two changes from the 2010 analysis. The Allatoona relationship was revised in 2012 based on a resurvey of the sedimentation ea-capacity curves were updated as a result of changes in sedimentation in antation resulted in capacity changes to the conservation storage at the a 379,469 ac-ft to 349,922 ac-ft, at the winter pool level (823 ft) from 214,473 tom of conservation pool (800 ft) from 82,891 ac-ft to 68,006 ac-ft, and the m 670,047 ac-ft to 626,860 ac-ft. The second change was a modification in the leakage at the dam. In computing the yield of the reservoir, the to be included. A correction was made to remove the 75-cfs leakage value odel. This information has been added to the updated HEC-ResSim Critical

nave affected the change between what was shown in the October 2014 R/SEIS:

st differences price Indices has risen and the cost model was updated to Cost data contained in the U.S. Energy Information Administration (EIA) *Estimates for Utility Scale Electricity Generating Plants*", April 2019, was used FERC spreadsheet models for power generation costs.

capacity in the USACE HAC background studies dated 2011 for the ACT November 2019 Draft FR/SEIS (Appendix D, Attachment 2) showed both are nearly the same. Further review of the October 2014 Final EIS Update of the ACT River Basin may provide additional insight to these perceived

thod was used to calculate dependable capacity. Details are provided in the Appendix D, Attachment 2).

project flood operation would release less water than the NAA for the lower age (elevation less than 569 ft). However, because the modified Weiss flood water than the NAA for upper portion of surcharge flood storage (elevation period slightly higher downstream river levels would be expected to occur am of Gadsden, AL. The resultant river levels would remain below what trural conditions. An evaluation of the modeling results of the H. Neely Henry tic and frequent flooding and evacuation of water from the reservoir will time.

Commenter	Commontor	Poprosonting	Comment	Comment	Commont	
NGO-12	Kelly Stephens, Board Member	Neely Henry Lake Association	1/29/2020	В	As a result of the proposed changes to the Water Control Manual, the full impact of increased frequent evacuation is unknown without a complete and comprehensive Environmental Impact Study regarding endangered species, fish spawning, marine vegetation, etc.	The Draft FR/SEIS for the ACR time step. H. Neely Henry pool This information was used to de on the environment.
NGO-12	Kelly Stephens, Board Member	Neely Henry Lake Association	1/29/2020	С	A recently completed study revealed that the Neely Henry Reservoir has a \$570 million annual positive economic impact to the local communities. Should the proposed changes be implemented, we would expect a significant reduction to the economies of the impacted communities.	Modeling performed in conjuncti operations would not result in ac
NGO-13	Steve Forehand, Legal Officer	Lake Martin Resource Association	1/31/2020	A	APCO and the Corps have a long-standing agreement that APCO would cause releases from its reservoirs on the Coosa and Tallapoosa Rivers sufficient to generate flow of 4,640 cfs at the Montgomery, Alabama gauge under normal flow conditions. This agreement was made to support navigation on the Alabama River. Since the 4,640 cfs flow is comprised of releases from the Coosa and Tallapoosa Rivers, it stands to reason that reduced flows in the Coosa River caused by retaining more water in Allatoona will require greater releases from the Tallapoosa River to support the 4,640 cfs flows in the Alabama River. There appear to be no studies in the Draft EIS to quantify the impact on the Tallapoosa and the lakes located on that system. LMRA believes a study on the effects of changes to Allatoona water storage on the Tallapoosa River system, and specifically Lake Martin, should be a part of the EIS.	As part of the 2015 ACT WCM L included. The Drought Plan incl and Tallapoosa River projects. negligible change in the amount and Table 5.5 in the FR/SEIS). anticipated.
NGO-13	Steve Forehand, Legal Officer	Lake Martin Resource Association	1/31/2020	В	The Draft EIS proposes decreases in flows on the Coosa system by retaining more water for longer periods in Lake Allatoona. This change is for the purpose of acceding to Atlanta's request for additional storage for drinking water. When the Corps implemented the Water Control Manual for the ACT basin in 2015, it acknowledged that changes in the Allatoona Water Control Manual would result in water quality degradation. The Corps then opined that states and stakeholders would be responsible for addressing the consequences of the Corps' operational decisions. While many stakeholders and commenters, including the United States Environmental Protection Agency, disagreed with this approach, the Corps accepted no responsibility for water quality degradation. If the Corps believes that stakeholders should her responsibility for its water decisions, then the Corps should also require Atlanta to utilize "adaptive management techniques" could condition any allocation of storage for drinking water on ensuring that more treated water will be returned by Atlanta to the Coosa system.	The annual flow duration curve (flow in the Alabama River at the would overall be marginal. As s marginally lower in the fall to ear as a direct result of the proposed Martin projects, which include ra those projects would be accomp fall to early winter months. The no measurable effect on flow co overall changes to flow and wate proposed operational changes a indicated potential for slightly re- conditions, USACE acknowledg the state to adjust some dischar circumstances may warrant con- coordination with the state and s occurrences since the 2015 AC ⁻ withdraw from Allatoona Lake (C the lake or to the ACT River Bas measures, many of which are m
NGO-13	Steve Forehand, Legal Officer	Lake Martin Resource Association	1/31/2020	С	Since Allatoona was built with Federal funds, Congress authorized the purposes of the project. Since Congress authorized and established the purposes the project, Congress is the only authority that can authorize uses that vary from those previously authorized. There is no evidence that the Corps sought or obtained Congressional approval for the changes in storage for Allatoona. Unless and until Congress authorizes these changes, the action by the Corps is invalid and without authority. The Corps should obtain Congressional authority before any of the proposed changes in storage for Allatoona are implemented.	Congress enacted the WSA, aut supply, and water supply storage The current study is evaluating a any exercise of its discretionary not involve major structural or op complete that legal analysis and However, USACE notes that the to authorized purposes, and oth analysis in the Draft FR/SEIS in or beneficial (Section 7.7).
Business						
B-01	Stacey Graham	Southern Company Services	11/15/2019	A	I am requesting the HEC-ResSim and HEC-5Q models that were developed for the ACT ACR evaluation.	The links to download the reque 2019.
B-02	Megan Rivera	Hazen and Sawyer	11/17/2019	A	I am writing to request the Allatoona-Coosa Reallocation Study HEC-ResSim Model and HEC-ResSim Model Supporting Documentation as soon as possible to be responsive during the comment period.	The link to download the reques
B-03	Alan Peeples	Alabama Power Company	12/2/2019	A	In a letter dated November 22, 2019, the State of Alabama requested a 60-day extension of the deadline for filing comments with the Corps of Engineers concerning its Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (Draft FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals. Alabama Power Company supports the State of Alabama's request. Given the substantial amount of information and analysis contained in the Draft FR/SEIS and related documents, the complexity of the issues evaluated in the Draft FR/SEIS, the importance of having informed input from all stakeholders participating in the comment process, and the approaching holiday season, the State of Alabama's request for 60 additional days is reasonable and a grant of that request is in the public interest	Based on a December 18, 2019 notification, the public comment

Study evaluated HEC-ResSim model simulation results, daily and hourly elevation-duration curves and tables were developed using model outputs. termine if there would be an increase in evacuation frequency and effects

tion with the ACR Study has shown that the APC-proposed modified flood dverse changes to the H. Neely Henry pool elevation.

Update, an APC and USACE evaluation of the APC Drought Plan was cludes provisions to adjust the flow requirement from the APC's Coosa River The analysis of the proposed action included in the Draft FR/SEIS shows a t of water released from the Allatoona project (Table 5.1, Section 5.1.2.2, Therefore, no increase in releases from the Tallapoosa projects is

(Figure 5-16, page 5-24 in the FR/SEIS) confirms that the differences in confluence of the Coosa and Tallapoosa rivers between the NAA and RP stated on page 5-29 of the FR/SEIS, the flows at that location would be arly winter and marginally higher in January and February. This would occur ed modified flood operations requested by APC at the Weiss and Logan aising the winter pools at both projects. Maintaining higher winter pools at plished by slightly reducing hydropower generation at both projects during proposed water supply storage reallocation at Allatoona Lake would have onditions in the lower Coosa River. USACE would expect to see negligible ter quality under the RP in this study compared to the NAA. In studies of at Allatoona and Carters lakes for the 2015 WCM Update, the analyses educed flow conditions under certain circumstances. Under extreme drought ged potential for minor occurrences of water quality effects that might require rge permits. USACE also acknowledged that extreme drought sideration of special releases to alleviate short-term critical problems in stakeholders. To our knowledge, there have not been any such T River Basin WCM Update was approved. The water supply providers that CCMWA and city of Cartersville), and return treated wastewater directly to sin, have implemented highly effective water conservation and efficiency nandatory and enforceable at the state and county levels.

athorizing USACE to include storage in its reservoir projects for water ge has previously been included in Allatoona Lake pursuant to that authority. a request to increase water supply use of the project. USACE agrees that *v* authority under the WSA must have documentation that such action would operational change or seriously affect any authorized purpose. USACE will d document in the ROD, as appropriate, any relevant conclusions. e Draft FR/SEIS extensively documented the operational changes, impacts ner effects of each alternative. In virtually all relevant categories, the indicated that the effects would be no more than negligible or slightly adverse

sted information were provided to the requester on November 26 and 27,

sted information was provided to the requester on December 20, 2019.

press release issued by USACE Mobile District and subsequent email period was extended to January 29, 2020.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
B-04	Mark Crisp, Managing Consultant	Global Energy & Water Consulting, LLC	12/9/2019	A	Please send a copy of the model to the following address.	The link to download the reques
B-05	Neil Compton, Senior Vice President	Farmers and Merchants Bank	12/10/2019	A	Concerned with winter water level on Lake Weiss. I understand the Corps is considering only a 3-ft drop during winter pool instead of current 6-ft drop. This will be a positive economic impact for our area. This will greatly enhance property values for the area and should increase development (residential) for Cherokee County. I am for the proposed drop of only 3 ft for Weiss Lake during the winter.	The RP includes raising the win Final FR/SEIS acknowledges ar proposed increase in winter poo
B-05	Neil Compton, Senior Vice President	Farmers and Merchants Bank	12/10/2019	В	Also understand the Corps is considering dropping the flood level from 574 (ft) to 572 (ft). This is also a positive impact for Weiss Lake. I am for this proposal as well!	The RP includes lowering the m
B-06	Tony Lumpkin, President	Buck's Island and MarineONE Corp.	1/27/2020	A	(The completed comment form included a statement of concerns developed by the Neely Henry Lake Association.)	See the response to NGO-12 or
B-06	Tony Lumpkin, President	Buck's Island and MarineONE Corp.	1/27/2020	В	 (Additional comments to NHLA statement of concerns). This comment is on the proposed changes by US Army Corp of Engineers as described in the attached (the NHLA statement of concerns). We, and our 33 employees, are concerned that these proposed changes to Neely Henry could cause increased frequent evacuation and lower water levels could have very significant negative results on our business. We sell and service boats. Eighty five percent of our customers use these boats on Neely Henry Lake. Lower lake levels will definitely cause fewer boaters to use the lake, for fishing and recreation and less frequently. That would have a multi-million dollar negative effect on our business. A recently completed study citing the \$570 million annual positive economic impact of the Neely Henry Reservoir including \$16 million from our company alone! In addition, we have another business which is a lake front residential subdivision. Forty seven residents in that subdivision would see major loss of property values with unreliable lake levels. We implore you to consider us "little folks" in this decision. We are certain that Alabama Power Company stockholders and its employees will be just fine without this dangerous change! 	The proposed modified Weiss E portion of surcharge flood storag release more water than the NA ft), slightly higher downstream ri upstream of Gadsden, AL. The conditions. An evaluation of the more drastic and frequent floodi periods of time.
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	A	Alabama Power fully supports the Corps' proposal to approve Alabama Power's requested flood risk management operational changes at Weiss and Logan Martin, referenced in the Draft FR/SEIS as the Modified Flood Operation ("MF01") plan, including the winter pool elevation changes and revised guide curves at Weiss and Logan Martin. The proposed changes to the flood risk management operations plan at Weiss and Logan Martin, including reduction of the surcharge elevations, are consistent with long-standing operational practice for flood risk management within the Coosa basin, and are critical to avoid flooding of highly developed areas upstream of both dams, as compared to the less developed areas below the dams, and to relieve the Corps and Alabama Power from the current administrative burden and uncertainty of requesting, reviewing, and documenting operational variances during high flow events. In addition, the proposed increases in winter pool elevations at Weiss and Logan Martin will not materially increase upstream or downstream flood risk and will enhance recreational use and aesthetic conditions at both reservoirs. Alabama Power and various stakeholders, as documented in connection with the relicensing of the Coosa Project by FERC, have long supported these changes.	The RP in the Final FR/SEIS for Weiss and Logan Martin project
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	В	Alabama Power joins the State of Alabama in opposing the proposed increased water supply operations at Lake Allatoona. We share the State of Alabama's concerns about the legal authority of the proposed water supply reallocations and the potential impacts downstream. We reiterate our ongoing concerns about the Corps' 2015 water control manual for Allatoona, which is currently the subject of litigation. The 2015 Allatoona manual, which adopted multiple operational changes intended to maintain "substantially higher lake elevations," and "to manage the lake at the highest level possible for recreation and other purposes," has caused reduced inflows to Weiss Lake during critical low-flow periods, interfering with Alabama Power reservoir operations, as well as downstream water quality. Increased or expanded water supply operations will only increase detrimental impacts to downstream interests, absent enforcement mechanisms and downstream flow guarantees.	Refer to USACE responses to S ACR FR/SEIS. These response impacts of the proposed storage with the stated concerns about to October 2014 Final EIS for the N For example, the first quote is u that would result in "substantiall effects (i.e., more storage would purposes, including downstream role of "action zones" within the action zones would be used to r purposes." "Other purposes" widepleting conservation storage

sted information was provided to the requester on December 14, 2019.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the ind documents the economic and recreational benefits associated with the ol levels.

naximum surcharge (flood) level at Weiss Lake from 574 ft to 572 ft.

n NHLA concerns.

Dam flood operation would release less water than the NAA for the lower age (elevation less than 569 ft). However, because Weiss Dam would AA for upper portion of surcharge flood storage (elevation greater than 569 river levels would be expected during this period from the spillway to just a resultant river levels would remain below what would occur under natural e modeling results of the H. Neely Henry reservoir project do not indicate ling and evacuation of water from the reservoir would occur and for longer

r the ACR Study includes APC-proposed modified flood operations at the ts.

S-06, State of Alabama (Office of Water Resources) comments on the Draft ses address concerns about the legal authority and potential downstream ge reallocation at Allatoona Lake for water supply. USACE does not agree the 2015 ACT River Basin WCM Update, and specific quotes from the WCM Update contained in the APC comment are presented out of context. used only twice in the entire EIS document in reference to a plan (Plan G) Illy higher lake elevations <u>under drought conditions</u>" among other expected Id be conserved during a severe drought while continuing to meet other m needs). The second quote is used twice in the document to describe the e conservation storage pool. The entire sentence reads as follows: "The manage the lake at the highest level possible for recreation <u>and other</u> would include conserving storage under dry conditions to avoid excessively e needed for hydropower generation and downstream flow needs.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	С	Alabama Power requests that the Corps consider a Weiss and Logan Martin-only alternative that carries forward Alabama Power's proposed changes at Weiss and Logan Martin without linking the MF01 plan to the various increased water supply allocation alternatives for Allatoona. Because the proposed changes at Allatoona are not necessary to enable the changes at Weiss and Logan Martin, the Corps can approve the Weiss and Logan Martin changes without also having to approve the Allatoona proposal. Given the controversial nature of the proposed changes at Allatoona and the incomplete record to support the changes at Allatoona, the Corps should move forward with the Weiss and Logan Martin changes as a stand-alone alternative.	The "modified flood operations of evaluated independently as one effects. Alternative 9 was not se objectives of the ACR Study, whi reallocation of storage at Allatoo APC-proposed modifications to into a single study so that the cu addressed and considered. Sim and also combined into multiple have been considered under NE or both proposed actions, in its I
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	D	The Corps' operation of Allatoona directly impacts inflows to Alabama Power's Coosa Basin projects, starting with the Weiss project, which is near the city of Leesburg, Alabama and extends upriver to Mayo's Bar in Floyd County, Georgia. Reduced outflow from Allatoona and Carters has a negative impact on water quality, reservoir storage, and hydropower generation at Weiss as well as all other Alabama Power downstream hydroelectric projects on the Coosa River. Alabama Power relies on the upstream flows from Allatoona in determining how much flow it may depend on to generate electricity from its hydroelectric dams in order to assure that the electricity needs of its customers are met. The Corps has estimated that for every kilowatt hour of electric energy generated at Allatoona three additional kilowatt hours are generated at the downstream power plants. Accordingly, lower flows from reduced hydro-generation at the Corps' Allatoona project result in reduced hydro-generation at Alabama Power's Weiss project and the other Alabama Power projects downstream on the Coosa River.	The HEC-ResSim and HEC-5Q reallocation of storage in Allatoo downstream APC projects comp changes to downstream flow, re projects would be expected. The appendices.
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	E	Alabama Power also relies on flows from Allatoona to meet certain downstream flow obligations and commitments for navigation, species conservation and protection, water quality, municipal and industrial use, and recreation. Reduced outflow from the upstream Corps projects could also impact threatened and endangered species below Weiss Dam. While Alabama Power's Tallapoosa projects are not directly downstream of any Corps projects, reduced flows in the Coosa River increase demands for additional releases from Alabama Power's Tallapoosa projects in order to support flows on the Alabama River, so those projects are also affected by Allatoona operations.	Refer to USACE response to B- effects on threatened and endar USFWS for the proposed action be either "no effect" or "may affe influence for the ACR Study. Re the HEC-ResSim modeling of th in the ACR Study demonstrated projects (refer to Section 3.0 of the
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	F	Alabama Power strongly supports the proposed changes at Weiss and Logan Martin in the TSP and urges the Corps to approve these changes in the Final FR/SEIS. Alabama Power would like to provide some additional historical background in support of the Corps' proposal to approve these changes.	The RP in the Final FR/SEIS for Weiss and Logan Martin projects on the modified flood operations
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	G	Alabama Power supports the TSP to the extent it includes MF01—the requested changes to flood operations and guide curves at Weiss and Logan Martin. (Draft FR/SEIS, at 7.1.2 and 7.1.3) Alabama Power is concerned, however, with the suggestion in Table 4-3 and elsewhere that the benefits of the TSP are "to be determined" with respect to multiple evaluation and screening criteria. Alabama Power is also concerned about other assumptions in the Corps' FR/SEIS, including the Corps' understanding of Alabama Power's flood operation obligations, potential impacts of the proposed changes, hydropower production, and Alabama Power's downstream flow commitments to support navigation.	Table 4-3 in the Final FR/SEIS in alternatives are discussed furthe
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Н	Concerning the suggestion that Alabama Power "has not yet provided documentation to support the requirement that this alternative is providing the maximum flood control that is economically feasible," Alabama Power refers the Corps to the economic feasibility information provided on November 12, 2019. Under P.L. 83-436, economic feasibility was and remains an issue for FERC. ("The license relating to such development shall require the maximum flood control storage which is economically feasible") The maximum surcharge elevations established by the later issued MOUs, 574 ft. at Weiss, and 477 ft. at Logan Martin, were not expressly stated in the FPC licensing order or later amendments, and were not known during the period of time fee title and flowage easements needed for operations of these projects were being acquired, and there was no determination at that time of the economic feasibility of acquiring flowage easements to elevations 574 ft. at Weiss and 477 ft. at Logan Martin, lin the period of time fee title and flowage easements to elevations 574 ft. at Weiss and 477 ft. at Logan Martin dams, respectively, has been subject to extensive development. Accordingly, as shown by the information provided by Alabama Power to the Corps on November 12, 2019, it is not now economically feasible, nor is it prudent or reasonable, to acquire additional flood easements upstream of those dams up to the maximum surcharge elevations provided by the MOUs.	APC has addressed all three ele aspects of elements two and thr has the responsibility through its Act are satisfied, including the "r being underway.

only plan" (called the MF01 plan or Alternative 9) was modeled and e of the alternatives considered in the study, including its environmental elected as the USACE RP because it would not address one of the primary hich was to address the State of Georgia's water supply request for ona Lake. The storage reallocation request at Allatoona Dam and Lake and flood operations at the Weiss and Logan Martin projects were combined umulative effects of both of those actions could be more effectively nee the study evaluated each action as a stand-alone individual alternative e alternatives (varying based on storage reallocation options), all of which EPA, the USACE decision-maker could approve either one proposed action, ROD.

R modeling conducted for the ACR Study demonstrate that the proposed ona Lake for water supply would have negligible overall effects on pared to the NAA under a full range of hydrologic conditions. Minimal eservoir storage, water quality, and hydropower generation in the APC ne effects are well documented in the Final FR/SEIS main report and

-07, Comment D. With respect to expressions of concerns about potential ingered species, USACE has successfully completed consultation with the his addressed in the ACR Study, and the USFWS concurred that there would ect, not likely to adversely affect" on listed species within the region of the entire ACT River Basin associated with the proposed actions considered that there would be negligible effects on the operation of those reservoir the Final FR/SEIS main report and Appendix E, Section E.1).

r the ACR Study includes APC-proposed modified flood operations at the ts. APC has not provided the additional historical background information s proposal, as offered in the APC comment.

identifies preliminary alternatives. The impacts to the final array of er down in section 4.0.

ements of the Coosa Power Act. The USACE has evaluated the technical ree, and the APC responses satisfy those two elements. However, FERC s licensing processes to ensure that all three elements of the Coosa Power 'maximum economic feasibility' element. USACE coordination with FERC is

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	I	The Draft FR/FEIS states (4.5.7, p. 4-21) that under MFO 1 there is a reduction in summer and winter flood storage at Weiss and Logan Martin based on the proposed lowering of the induced surcharge curves. This is not entirely accurate based on the long history of variances requested and granted by the Corps. At Weiss, the reservoir has never exceeded the flowage easement elevation of 572 ft., and at Logan Martin, the flowage easement elevation of 473.5 ft. has not been exceeded except for the 1977 and 1979 events described above; and the full induced surcharge elevations specified by the MOUs have never been utilized for flood control operations at either project. As noted above, lowering of the induced surcharge curves will improve flood risk management upstream of the dams in areas of intense development. And, based on the operational changes, there is no material change in the level of flood risk management, principally due to the plans to increase releases from the reservoirs earlier in the event. See proposed Weiss and Logan Martin flood control regulation schedules (with changes denoted) at Appendix A to Attachment 6 of Draft FR/SEIS Appendix C.	The proposed alternative (MF01 and Logan Martin lakes, and the increased risk to downstream cc change from the stated volume is synthetic 1 percent chance exce areas where the risk of flooding
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	J	Moreover, the Corps' own estimates in Table 4-9 show that the modified flood regulation schedules reduce the number of structures impacted in all modeled events. There is an unexplained inconsistency, however, in comparing Table 4-9 (structures) with Table 4-10 (damages), with respect to the October 1995 event. Table 4-9 shows that for the October 1995 event ten fewer structures are impacted, while Table 4-10 shows that the structure damages for the October 1995 increased by over 15%. Alabama Power believes that Table 4-9 is correct. As shown by Draft FR/FEIS Appendix C, Attachment 6, p. 27-31, the October 1995 event was a minor 5-year frequency event and the peaks were below the existing flowage easement elevations at Weiss, Logan Martin, and Childersburg, and no higher than the existing plan elevation at Gadsden.	Damages and the number of str conveyance of water within the f decreased under certain condition structures is not uniform through being flooded can have a higher have higher reported damages t
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	К	The statements in the Draft FR/SEIS (<i>e.g.</i> at 7.1.2 and 7.1.3) that the Corps "will conduct additional analysis of impacts to private property both upstream and downstream" of Weiss and Logan Martin, in order to provide the "decision maker" with "a comprehensive impact assessment of the effects for Alabama Power's current and proposed operations," is troubling based on the decades of work that has already been done on these issues by Alabama Power in consultation with the Corps as outlined above. Alabama Power has already performed and provided to the Corps all information and studies requested. Nevertheless, Alabama Power will cooperate with the Corps in performing and analyzing additional studies that reasonably may be needed prior to the issuance of the Final FR/SEIS. As explained in the following section of this comment letter, on the downstream side, Alabama Power has already obtained the necessary additional flood easements, so "impacts" to property owners on the downstream side have already been addressed. And, on the upstream side, "impacts" to property owners would result only if the Corps selects the NAA and retains the existing surcharge curves. A primary reason why Alabama Power wants to change the flood operations is to protect upstream property owners from "impacts" of the NAA. So there is nothing left to study.	USACE has reviewed the easen downstream impacts warrant a r recommendations can be found
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	L	The Corps' suggestion that the Final FR/SEIS may require Alabama Power "to purchase any additional real interests" (e.g. at 7.1.2 and 7.1.3) is a matter of great concern. The Draft FR/SEIS (4.3.2) does not state any standards governing when additional real property interests would be required to be purchased. See 4.3.2. Table 4-1, for example, states that the purchase of "additional property interests downstream" and "reservoir flowage easements up to the maximum surcharge elevation," are being considered. The Draft FR/SEIS also incorrectly states that the current Water Control Manuals require Alabama Power to "acquire the reservoir flowage easements up to the maximum surcharge elevation." (Id. at 4-6.) Property interests necessary for project purposes are licensing matters for FERC to determine, not the Corps.	Part of the USACE evaluation of whether APC has sufficient land Estate Division could not make a have legal descriptions that clea methodologies employed in the it has determined or will determi change. USACE recommends t operational change and change it has sufficient land rights to su
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Μ	Alabama Power has already identified and acquired flowage easements downstream of Logan Martin Dam as needed for the increase in releases from 50,000 cfs to 70,000 cfs under the revised flood control plan and has provided all requested information concerning those easements. Nevertheless, Alabama Power will provide whatever additional documentation of these easements the Corps reasonably requests. See Draft FR/SEIS, Appendix C, Attachment 6, 2005 Coosa River Flood Study, Section 4. The additional easements below Logan Martin were acquired based on the proposed flood control regulation schedule, rule no. 2, calling for releases of 70,000 cfs under specified conditions in order to lower Logan Martin to 460 ft —a unique situation where the outflow from Logan Martin could exceed the concurrent rate of inflow.	No response needed; if the addi
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Ν	At Weiss, on the other hand, outflows under the proposed plan will not exceed inflows. For that reason, no additional easements are needed. Under Alabama law, there is no legal requirement or necessity to acquire additional easements or property rights for downstream releases during high flow events, as long as the outflow from the dam is no greater than the concurrent rate of inflow to the dam. See, e.g. Ellis v. Alabama Power Co., 431 So. 2d 1242, 1245 (Ala. 1983) ("Plaintiffs failed to establish negligence and to overcome the causation obstacle that the construction and operation of the dams during the period in question did not result in any water flow being greater than would have occurred under natural conditions."); Bryan v. Alabama Power Company, 20 So. 3d 108, 116-18 (Ala. 2009) ("It is settled by our decisions that one who constructs a dam in a navigable stream is not an insurer against damages to lower owners APCo's activities during the floods lessened the outflows from Martin Dam such that the flooding that did occur downstream was less than what would have occurred naturally.")	Pursuant to the ongoing USACE data is available at the current ti the proposed operational chang. The USACE analysis of what ea analysis of potential liability. Thi level of flood risk management to winter pool raise. Therefore, the

1 or Alternative 9) affects the flood risk management (FRM) pools at Weiss erefore an analysis of downstream impacts was necessary to identify any ommunities such as Gadsden, AL, and Childersburg, AL. There is a in the FRM pools at both projects. Multiple historic events as well as a eedance storm were modeled with the new operational changes to identify would be changed.

ructures damaged, while related, do not change at the same rate due to the floodplain. There are instances in which the number of structures is ions in one area and increased in another. Furthermore, the value of hout the floodplain, which helps explain how a smaller number of structures er reported damage value. For example, many less valuable structures might than fewer more valuable structures.

ments obtained by APC as well as identified areas where additional recommendation to purchase a flowage easement. Details of the I in Appendix G (Real Estate).

of the request for changes to the operational plan is a determination of d rights to support the operational change. The USACE Mobile District Real a determination because the real estate records provided by APC did not arly delineated the area over which rights were acquired, or the e land acquisitions. Coordination with FERC is required to ascertain whether nine whether APC has sufficient lands rights to support the operational that, if FERC does not provide that determination, any approval of the e to the Operations Use Manual be made conditional on APC demonstrating apport the operational change.

litional information is not provided by APC, note that in the Final FR/SEIS.

E interagency coordination with FERC at the time of this report, insufficient time to determine the sufficiency of APC's current real estate interests for ges to the Weiss and Logan Martin dams.

asements are required is based on engineering judgment rather than legal his is based on the analysis of what is necessary to maintain the existing based on APC's requested modifications to both the operations and the he cited cases are not relevant at this point.

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	0	These principles are illustrated by the discharges to the Weiss by-pass during the design (100-year) event. The Corps flood risk management impact analysis (Draft FR/SEIS, Appendix C, Attachment 4, p. C-30) notes an increase of less than five feet in water surface elevation between the base and proposed condition immediately below the dam in the Weiss by-pass, an undeveloped area and natural flood plain downstream of the Weiss spillway, during the design (100 year) event, comparing the base (574 ft. surcharge curve) with the proposed (572 ft. surcharge curve) condition. However, the proposed plan results in about a 30 ft. reduction in peak elevation at that location compared with the unregulated "natural" condition—the point being that there is a substantial beneficial flood control in the Weiss by-pass from operations under the proposed flood control plan. (Draft FR/SEIS, Appendix C, Attachment 6, p. 6.) Accordingly, under the legal principles outlined above, there is no legal necessity or need for downstream flood easements in the Weiss by-pass or elsewhere based on downstream releases during high flow events. And again, property interests necessary for project purposes are licensing matters for FERC to determine, not the Corps.	The allowance for private reserv USACE maintain some control. Logan Martin and Weiss dams b necessity for flowage easements existing flood risk management I winter pool raise. The USACE a methodologies employed in APC
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Ρ	There is no requirement in the FERC license or Water Control Manuals requiring APC now to acquire easements up to maximum surcharge elevations. And, more importantly, there is no flood control necessity to do so, based on the extensive studies already conducted, and the 40-years of operational history of the Weiss and Logan Martin projects. Moreover, it is not economically feasible to do so, as shown by the November 12, 2019 economic feasibility study previously provided by Alabama Power to the Corps. Obviously, upstream easements alone will not protect the property and structures that would remain in the newly acquired easements. To the contrary, backing floodwaters up to the maximum surcharge curve elevation under the existing plan would necessarily damage any structures below that elevation, either with or without an easement to do so.	The FERC license to APC, issue real estate rights to flood the lan from the requirement under USA Section 9 of the Coosa Power A reasonable rules and regulations navigation." Part of the USACE evaluation of whether APC has sufficient land Estate Division could not make a have legal descriptions that clear FERC is required to ascertain w rights to support the operational determination, any approval of the APC demonstrating that it has s
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Q	The proposed flood control plan will protect both the upstream structure and the downstream structures, as the Corps and Alabama Power have both recognized under the variance system in place over the last 40-years, and should be approved in revised manuals and the Final FR/SEIS.	The APC-proposed modified floo evaluated in the Final FR/SEIS a
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	R	Alabama Power agrees with the Corps finding (p. 4-26, -27) that MFOI has "slight beneficial impacts to recreation atWeiss and Logan Martin due to higher winter lake levels," specifically "from October through February at Weiss Lake, and from November through mid-March at Logan Martin Lake," which is important considering that "[r]ecreation was a key issue for many of the stakeholders" (p. 4-29. Alabama Power also agrees that higher winter lake levels at Weiss and Logan Martin have "beneficial" impacts to "aesthetic resources." (Table 5-1, p. 5-8).	Concur with the comment. No re
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	S	In section 4.5.8, the Corps "recommends that an assessment covering the impacts to dam safety from the proposed changes should be required under the updated FERC license." Alabama Power has no objection to this recommendation, and agrees that this issue is vested with FERC, not the Corps, for the Weiss and Logan Martin projects.	Comment acknowledged. (The received in time, a summary of t 7.0.)
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	т	As noted in Alabama Power's August 15, 2018 scoping comments for this FR/SEIS, given this history, any additional evaluation of the potential environmental impacts of Alabama Power's proposed changes based on new information should not itself require an EIS. An EA alone should be adequate to satisfy NEPA requirements. The scope of any such EA would necessarily be narrower than the proposed Draft FR/SEIS, which would include the evaluation of unrelated changes proposed at Lake Allatoona. Alabama Power's proposed changes would implement new winter pool levels and adopt longstanding operational practices at Weiss and Logan Martin that have previously been authorized through variances and other ad hoc approvals. As the Corps and FERC have already concluded, the overall environmental impacts of Alabama Power's proposed changes will therefore be minimal.	This ACR Study is, in effect, an two specific proposals deferred of detailed study. Those actions an Martin projects and the Georgia- ACT WCM Update required an E these proposed actions. Further effects.
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	U	For example, Alabama Power notes that Table 4-11 (p. 4-23) shows that MFOI has no impacts on the state line flow drought trigger. And, Alabama Power agrees with the Corps that MFOI "has no significant environmental effects compared to the NAA or other alternatives," and was properly included in the TSP (p. 4-29).	USACE concurs that the APC-m impacts on the state line flow trig 9 does, however, have some lim dams. Modeling studies also for would have a negligible effect or
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	V	Alabama Power also requests that the Corps further consider a Weiss and Logan Martin-only alternative that evaluates Alabama Power's proposed changes at Weiss and Logan Martin without any increased water supply allocation at Allatoona. The Corps' current 2015 ACT Master Manual is under review before the U.S. District Court for the District of D.C. in <i>State of Alabama v. U.S. Army Corps of Engineers</i> , No. 1:15-cv-00696. Resolution of the claims in that case, as well as concerns raised in these comments, could impact the Corps' ability to reallocate additional storage at Allatoona to water supply. The Corps should therefore be prepared for a scenario allowing the proposed changes at Weiss and Logan Martin to go forward while the Corps is required to re-evaluate its authority to operate Lake Allatoona for additional water supply.	USACE evaluated an alternative alternatives addressing only stor two proposed actions to provide proposed action or an alternative public interest.

voir development on the Coosa River was granted with the caveat that USACE was mandated by the Coosa Power Act to maintain WCMs for based on the necessity for flood risk management. The analysis of the ts is based on the engineering judgment of the USACE for maintaining the based on APC's requested modifications to both the operations and the analysis of easement instruments provided by APC indicate that the C's prior land acquisition standards are unclear.

led September 4, 1957, in Article 38 requires APC to acquire appropriate nds above and below each dam. The requirement is separate and distinct ACE ER 1110-2-1451.

Act states: "The operation and maintenance of the dams shall be subject to as of the Secretary of the Army in the interest of flood control and

of the request for changes to the operational plan is a determination of d rights to support the operational change. The USACE Mobile District Real a determination because the real estate records provided by APC did not arly delineated the area over which rights were acquired. Coordination with whether it has determined or will determine whether APC has sufficient lands al change. USACE recommends that, if FERC does not provide the the operational change and change to the WCMs be made conditional on sufficient land rights to support the operational change.

od operations at the Weiss and Logan Martin projects have been fully and are included in the RP.

esponse required.

most recent FERC Dam Safety Report has been requested from APC. If the FERC Dam Safety Report will be included in Final FR/SEIS, Section

extension of the ACT River Basin WCM update process that is addressing from the approved 2015 WCM Update because they both required further are the APC-proposed modified flood operations at the Weiss and Logan a-requested water supply storage reallocation at Allatoona Lake. Since the EIS, an SEIS was the appropriate document to address either, or both, of er, an SEIS covering both actions facilitates the consideration of cumulative

modified flood operation plan (MF01), or Alternative 9, would have no igger and, overall, no significant impacts compared to the NAA. Alternative nited seasonal effects on flow conditions below the Weiss and Logan Martin bund that the proposed water supply storage reallocation at Lake Allatoona on flow conditions at the Alabama-Georgia state line.

e addressing only the APC-proposed modified flood operation, multiple orage reallocation at Lake Allatoona, and multiple alternatives combining the e the USACE decision-maker with the necessary information to select either ve combining both proposed actions, whichever would best serve the overall

Commenter	Commenter	Representing	Comment	Comment	Comment	
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	W	The Draft FR/SEIS discusses hydropower impacts but ignores the important issues. The value of hydropower generation and capacity greatly depends on "peaking" generation based on the time of day and season of the year. Hydropower generation is more important and valuable during peak hours and peak seasons than during other times of the day or seasons of the year. The changes at Allatoona to keep water levels as high as possible along with the reduction in peak generation during the fall season and shifting generation to the late November-December period seriously impacts the hydropower and navigation purposes of the project. The proposed water supply operations will only make those conditions worse.	To capture peak energy prices a blocks of hours On-Peak (SEPA daily energy simulation data into Report (Appendix D, Attachmen forecast Energy (Power) Prices Section 3.3 (Energy Prices). Th simulation results which have be 2.
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	X	Moreover, in all alternatives evaluated, the Corps identifies both energy and capacity cost impacts. In its review of the hydropower section of the Draft FR/SEIS, Alabama Power questions some of the methodologies used to determine impacts for the variety of alternatives. Simple errors in calculations presented in the tables are at times confusing. In particular, the methods and assumptions used to determine energy values result in impacts that could potentially be overstated. As related to capacity impacts, the methods utilized by the Corps result in reductions in dependable capacity that may not be realistic for Alabama Power projects. Alabama Power was unable to duplicate results for capacity values even under the assumption that the stated dependable capacity impacts (MW) and unit capacity values for the ACT system (\$123.95/kw-yr) are correct. In evaluating the stated dependable capacity impacts between alternatives. Alabama Power did expect some level of energy loss and cost impact from changes to operations at its Weiss and Logan Martin projects, but because of these issues identified, Alabama Power questions the reliability of the hydropower analyses to reasonably quantify impacts on energy and capacity to its projects related to the changes that were evaluated.	Transcriptions errors were made Hydropower Analysis Report. E economic benefits for the recom of capacity due to a loss in head result in insufficient generation t for these factors by giving a mea Average Availability Method is d December 31, 1985, Section 6-7 by the Water and Energy Task F systems. Studies have shown the rigorous LOLP (Loss of Load Pr
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Y	It is important to clarify, first, that the State of Alabama has no minimum flow requirements for water quality. Furthermore, the State of Alabama has never imposed any minimum flow requirements from the Coosa developments to support water quality through its Clean Water Act § 401 consultation authority. The 4,640 cfs flow commitment, specifically, was designed to aid navigation support on the Alabama River. While a variety of downstream interests may have come to depend on the 4,640 flow for various purposes, Alabama Power's commitment to meet the 4,640 cfs flow target is based only on navigation support. Alabama Power requests that the Corps clarify any statements to the contrary.	USACE concurs with your comm AL, is more correctly described a ACT River Basin WCM Update in necessary to support navigation Montgomery, AL (less than 4,64 and available conservation stora
B-07	Susan Comensky, Vice President, Environmental Affairs	Alabama Power Company	1/29/2020	Z	In 2006, Alabama Power, in conjunction with FERC, the Alabama Historical Commission ("AHC"), and consulting federally recognized Native American tribes, developed a historic properties management plan ("HPMP") for the Coosa River Project, which was developed as part of a Programmatic Agreement under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. 470F). As part of the relicensing process, Alabama Power has contracted with the University of Alabama's Office of Archaeological Research ("OAR") to fulfill the goal of conducting a field reconnaissance survey of select shoreline areas to determine the presence of Historic Properties as specified in the HPMP. Based upon the significant cultural resources data that has been developed for Weiss Lake and Logan Martin Lake under the HPMP so far, Alabama Power requests to be a consulting party in the development of any additional Programmatic Agreement between the Corps of Engineers and the Alabama Historical Commission regarding protection of historic properties at Weiss Lake or Logan Martin.	USACE Mobile District has invite party in the development of the I Commission, Georgia State Hist provided a draft of the PA for rev of the PA and Section 106 const
B-08	Steve Forehand	Russell Lands, Inc.	1/31/2020	A	APCO and the Corps have a long-standing agreement that APCO would cause releases from its reservoirs on the Coosa and Tallapoosa Rivers sufficient to generate flow of 4,640 cfs at the Montgomery, Alabama gauge under normal flow conditions. This agreement was made to support navigation on the Alabama River. Since the 4,640 cfs flow is comprised of releases from the Coosa and Tallapoosa Rivers, it stands to reason that reduced flows in the Coosa River caused by retaining more water in Allatoona will require greater releases from the Tallapoosa River to support the 4,640 cfs flows in the Alabama River. There appear to be no studies in the Draft EIS to quantify the impact on the Tallapoosa and the lakes located on that system. We believe a study on the effects of changes to Allatoona water storage on the Tallapoosa River system, and specifically Lake Martin, should be a part of the EIS.	See response to NGO-13, Com
B-08	Steve Forehand	Russell Lands, Inc.	1/31/2020	В	The Draft EIS proposes decreases in flows on the Coosa system by retaining more water for longer periods in Lake Allatoona. This change is for the purpose of acceding to Atlanta's request for additional storage for drinking water. When the Corps implemented the Water Control Manual for the ACT basin in 2015, it acknowledged that changes in the Allatoona Water Control Manual would result in water quality degradation. The Corps then opined that states and stakeholders would be responsible for addressing the consequences of the Corps' operational decisions. While many stakeholders and commenters, including the United States Environmental Protection Agency, disagreed with this approach, the Corps accepted no responsibility for water quality degradation. If the Corps believes that stakeholders should shoulder responsibility for its water decisions, then the Corps should also require Atlanta to utilize "adaptive management techniques" to use less water or to constrain the demand on its water systems. Alternatively, these "adaptive management techniques" could condition any allocation of storage for drinking water on ensuring that more treated water will be returned by Atlanta to the Coosa system.	See response to NGO-13, Com

and seasonal variations, the daily energy (generation) was subdivided into A contract), remaining Peak, Off-Peak, and Weekends. The subdivision of o energy blocks is described in Section 3.1 of the Hydropower Analysis and 2). Monthly prices for each of these daily blocks were derived from EIA and hourly Localized Marginal Prices (shadow market prices) described in the transfer of generation from one season to another is accounted for in the een added to the report in supplemental tables in Appendix D, Attachment

te in digitizing images of the tables and have been corrected in the Final Errors in hydropower tables did not carry over to the presentation of mmended alternative. Normal reservoir drawdown can result in a reduction d. At other times, diminished stream flows during low-flow periods may to support the available capacity in the load. Dependable capacity accounts easure of the amount of capacity.

described in Engineer Manual (EM) 1110-2-1701, "Hydropower", dated -7g and Appendix O, Section O-2c. This procedure was originally developed Force for evaluating relatively small hydro projects in large, diverse power that the Average Availability Method gives similar results to the more trobability) studies.

ment. The 4,640 cfs minimum flow in the Alabama River at Montgomery, as a "target" that was principally intended for navigation support. The 2015 included provisions to better define the flow conditions in the Alabama River n as well as a Drought Plan that defines minimum flow requirements at 40 cfs) when specific drought triggers dictate (state line flow, basin inflow, rage in APC reservoirs).

ted APC to consult on the RP in the ACR Study and serve as a consulting Programmatic Agreement (PA) for the project with the Alabama Historical storic Preservation Officer, and the USACE Mobile District. USACE has eview and comment and updated APC on the progress of the development sultations for the project.

ment A.

ment B.

Final ACR FR/SEIS

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
B-08	Steve Forehand	Russell Lands, Inc.	1/31/2020	С	Since Allatoona was built with Federal funds, Congress authorized the purposes of the project. Since Congress authorized and established the purposes the project, Congress is the only authority that can authorize uses that vary from those previously authorized. There is no evidence that the Corps sought or obtained Congressional approval for the changes in storage for Allatoona. Unless and until Congress authorizes these changes, the action by the Corps is invalid and without authority. The Corps should obtain Congressional authority before any of the proposed changes in storage for Allatoona are implemented.	See response to NGO-13, Com
Public						
P-03	Karen Sewell	Self	11/27/2019	A	I think it would be so beneficial for Logan Martin to keep their lake levels at least 2 feet higher in the winter. As a previous marina business owner and a current resident on Logan Martin I think the additional fishing it will provide will be beneficial.	The RP includes raising the win of the Final FR/SEIS acknowled winter pool levels at Logan Mart
P-03	Karen Sewell	Self	11/27/2019	В	Also as a current resident on the lake (Logan Martin) it will provide more beauty than muddy ground.	The RP includes raising the win 5.8.2 of the Final FR/SEIS acknowinter pool levels at both Logan
P-04	Tim O'Brien	Self	11/27/2019	A	Stating to be in favor of raising winter pool at Logan Martin lake to 462 ft. The higher Winter pool makes it so much safer to navigate the lake in the fall and spring time. Especially on those 75-80 degree temp March days where there is no reason not to be pleasure boating on the lake.	The RP for this study includes ra Section 5.0 of the Final FR/SEIS increase in winter pool levels at
P-05	Wayne Brown	Self	11/26/2019	А	Please leave Logan Martin alone and how it's always been.	Thank you for your comment. U
P-05a	Wayne Brown	Self	1/26/2020	A	Kindly consider leaving the Winter Elevation as it has always been. Raising the elevation by 2' will result in helping fewer than believe it will and will only cause considerable difficulty in many owners having access to any needed repairs to their existing piers and/or seawalls. In my family's case (and all our neighbors) it would only put water around our pier but not enough that a boat could still be floated to the pier. Leave it alone!	Thank you for your comment. U
P-06	Jerry Griffin	Self	11/26/2019	A	Please raise the winter level (at Logan Martin Lake) to at least 462 (ft) but without increasing the flood stage.	The RP includes raising the wint performed in conjunction with th including the revised winter guid Logan Martin Lake.
P-06	Jerry Griffin	Self	11/26/2019	В	Living on Logan Martin is wonderful, but Ala power can go away as soon as possible never been treated as bad telling me what I can and cannot do with my property I would love another option.	APC is responsible for shoreline
P-08	Rock and Linda Wester	Self	11/26/2019	A	I really don't understand why they only let 2 lakes down, Logan Martin & Weiss lake. We are completely dry docked from Sept till May! I understand there are 7 lakes that are on this stream & yet the only ones that they let down are the previous 2. They usually let these lakes 5' down. Why not let ALL the lakes down, say 1' instead. Then we would all have water year round& when it floodsall the lakes would flood just a little.instead of Logan Martin flooding 7'!	Logan Martin and Weiss dams of 436). APC was granted the right include operation for flood contro- winter, which results in lower residuring the wetter parts of the yes peak elevation from what would effectiveness would be lower and is temporarily stored in the flood easements within the reservoirs remaining dams (reservoirs) on as run-of-river (outflow equals in events.
P-08a	Rock Wester	Self	1/26/2020	A	I am sending this as a comment on the Logan Martin lake water level project. The draw down, at present in the winter, is 5 ft. from summer pool. I am told that this is for flood control. To my knowledge the only other lake on this chain that has a draw down is lake Weiss Lake north of us, which is also for flood control. And, there are flood easements on these lakes. As a result of this, many of us, on these lakes, are restricted from access to the lake from our property. As these are several lakes on this chain it would seem logical to spread the draw down along the whole chain. In taking this approach the whole chain could be used for the control needed.	You are correct. Logan Martin a Power Act (P.L. 83-436). APC w the requirement to include opera curve from summer to winter, wh storage for flood waters during th the downstream river peak eleva the winter, their effectiveness wo operations, water is temporarily purchased flowage easements w easements. The remaining dam they are operated as run-of-river except during extreme events. T system design or the purpose of

USACE Response

ment C).

ter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 lges and documents the benefits associated with the proposed increase in tin Lake as described in your comment.

ter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section towledges and documents the aesthetic benefits associated with higher to Martin and Weiss lakes.

aising the winter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). S acknowledges and documents the benefits associated with the proposed Logan Martin Lake as described in your comment.

JSACE values your input regarding Logan Martin Dam and Lake.

JSACE values your input regarding Logan Martin Dam and Lake.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for

management at Logan Martin Lake.

operate for flood control as a requirement of the Coosa Power Act (P.L. 83ht to develop the upper Coosa River for hydropower with the requirement to rol and navigation. The seasonal change in the guide curve from summer to servoir elevations in the winter, provides additional storage for flood waters ear. The flood operation of these reservoirs lowers the downstream river d occur naturally. If the reservoir were not lowered in the winter, their and potentially not in compliance with the Act. During flood operations, water d storage causing the reservoirs to rise. APC has purchased flowage s with the intent to store water to the limits of these easements. The the Coosa River have no flood control storage; therefore, they are operated nflow) reservoirs with small fluctuations in elevation except during extreme

and Weiss dams operate for flood control as a requirement of the Coosa was granted the right to develop the upper Coosa River for hydropower with ation for flood control and navigation. The season change in the guide thich results in lower reservoir elevations in the winter, provide additional the wetter parts of the year. The flood operation of these reservoirs lowers ation from what would occur naturally. If the reservoir were not lowered in rould be lower and potentially not in compliance with the Act. During flood storage causing the reservoirs to rise. APC has within the reservoirs with the intent to store water to the limits of these ns (reservoirs) on the Coosa River have no flood control storage; therefore, er (outflow equals inflow) reservoirs with small fluctuations in elevation Therefore, spreading the drawdown along the chain of reservoirs is not the f these other individual dams (lakes).

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-09	Angela Boozer	Self	11/26/2019	A	Please consider raising the winter pool of our lake (<i>Logan Martin</i>) by the recommended two feet. This will still allow people to work on sea walls and docks but in addition will allow more consistent use of the lake during the winter months. The water is a vital source of recreation and fun for those of us who live on Logan Martin and with the increased water level our recreational season can be extended. We are grateful for your consideration on this matter and hope to see the water level rise soon.	The RP includes raising the win of the Final FR/SEIS acknowled winter pool levels at Logan Mar
P-10	Tonja Ramey	Self	11/25/2019	A	Looks good to me. (<i>The writer forwarded 11/25/2019 email prepared by Linda Ruethemann, which reads as follows.</i>) "Logan Martin Lake Protection Association (LMLPA) speaking on behalf of our membership has supported a higher Winter water level of 462 for many years, We have voiced this request in writing and in person with the Corps on many occasions and are pleased to see movement in this direction. We represent approximately 900+ members. Many of these members live in sloughs/coves that are totally dry during much of the year and 2 additional feet would make a huge difference in their ability to access the water from docks, etc. Also, fishermen often voice their desire to us for the higher level."	The RP includes raising the win of the Final FR/SEIS acknowled winter pool levels at Logan Mar
P-12	Tammie Roberts	Self	12/2/2019	A	Leaving the water up (at Weiss Lake) would be wonderful for the people who live full time and fish all year round!	The RP includes raising the win Final FR/SEIS acknowledges an with the proposed increase in th
P-12	Tammie Roberts	Self	12/2/2019	В	It (raising the winter pool level) would bring so much more money to the community as well.	The RP includes raising the win Final FR/SEIS acknowledges an in winter pool levels.
P-13	Ashley Oneal	Self	12/2/2019	A	I live on the lake year around. I think that this will help the economy in our communities. I also know that most of the people complaining about it live in campers and are not going by the rules of having there homes out of the flood areas. Please pass the winter pool.	The RP includes raising the win Final FR/SEIS acknowledges an in winter pool levels.
P-14	Alan Roberts	Self	12/2/2019	А	Hope the winter levels (at Weiss Lake) can be raised this would be great.	The RP includes raising the win
P-14a	Alan Roberts	Self	1/7/2020	A	Please raise the winter lake levels (at Weiss Lake) so we can enjoy the lake. It would help create jobs and the towns the lake serves.	The RP includes raising the win the Final FR/SEIS acknowledge the proposed increase in the wi
P-15	Tambi York	Self	12/2/2019	A	I would like to express my sincere disagreement with any decision to raise the Winter water level for Lake Weiss. After the flood early this year with so much devastation to so many due to the winter water level being raised last year, I would hope that any decision to raise Winter levels would not even be a consideration. We have worked hard since the 2019 flood to rehab all the damage. Our Camper was a total loss due to the 22.5 ft of water on our lots. Please reconsider any thoughts of raising the Winter Water Levels for Lake Weiss.	The evaluation of APC's proposindicate the reservoir level woul flood events. The spring 2019 fleasement. Under the proposed
P-16	Carol Sears	Self	12/2/2019	A	We live at Three Mile Creek. Does this mean we will be more likely to experience flooding? We lost everything last Feb (<i>2019</i>).	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Reservoir. The spring 20 flowage easement. Under the p
P-17	David Danford	Self	12/4/2019	A	I'm so glad you guys are finally considering raising the water level of Weiss lake in the winter! I own 3 lots on the lake and enjoy fishing as much as I can. This will bring more revenue, and tourism to our county.	The RP includes raising the win Final FR/SEIS acknowledges an proposed increase in winter poor
P-17	David Danford	Self	12/4/2019	В	Although this (<i>raising the winter pool level at Weiss Lake</i>) is a great thing, there is something that needs to be addressed in Gadsden, Alabama, in the event of a flood like we had last year, the Minnesota bend causes catastrophic losses! Is there a way to fix this problem?	Widening Minnesota Bend on the ACR Study.
P-17	David Danford	Self	12/4/2019	С	Also will there be a period of time like every 3 to 5 years to lower the lake level to do repairs on docks and boat houses? I am certainly in favor of this if we could just get the kinks worked out!	If the current proposal to raise to of this study, future decisions to of docks and other facilities, and conducted in accordance with the reservoirs.
P-17	David Danford	Self	12/4/2019	D	Please let this (<i>raising the winter pool level at Weiss Lake</i>) happen, so many people need this, it affects property values and recreational activities, and would also build the fish population! This would be the best thing that's happened to our county in a long time. Thank you for considering this idea.	The RP includes raising the win Final FR/SEIS acknowledges an proposed increase in winter poo
P-18	Malene Jennings	Self	12/5/2019	A	Regarding lake level winter level on Weiss lake. Why are no public hearings being held in Cherokee county! Why would we have to travel to another area when Weiss is in Cherokee county? Am I missing something? There are plenty of places to hold an open forum in Centre, without driving to Gadsden, Rome, please reconsider and add Centre to this list if common sense prevails!	The USACE Mobile District dete River Basin after release of the and Childersburg, AL. Public so locations with excellent public p reasonable driving distance for
P-19	Charles Stover	Self	12/8/2019	A	I am requesting the ResSIM models and supporting data used for the draft ACT EIS. I assume this available in some type of download but if not my mailing address is: (address redacted).	The requested information was requested model from APC.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the benefits associated with the proposed increase in tin Lake as described in your comment.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the benefits associated with the proposed increase in tin Lake as described in your comment.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the lake access and recreational fishing benefits associated ne winter pool level.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic benefits associated with the proposed increase

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic benefits associated with the proposed increase

nter pool at Weiss Lake to elevation 561 ft (from 558 ft).

nter pool level at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of es and documents the recreational and economic benefits associated with inter pool levels.

sed changes to Weiss Dam includes the effects on reservoir levels. Results ld remain below APC flowage easements at elevation 572 ft for the historic flood event peaked at approximately elevation 571 ft, 1 ft below the flowage d plan, the reservoir would have been at the same elevation.

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for 019 flood event peaked at approximately elevation 571 ft, one foot below the proposed plan, the reservoir would have been at the same elevation.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic and recreational benefits associated with the ol levels.

he Coosa River to reduce or prevent flood damages is outside the scope of

the winter pool level in Weiss Lake to elevation 561 ft is approved as a result b lower the winter pool level below elevation 561 ft to facilitate maintenance d how often that action might occur, would be the responsibility of APC, he specific provisions of the FERC license for the APC Coosa River

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic and recreational benefits associated with the ol levels.

ermined to hold open house public meetings at four locations in the ACT Draft FR/SEIS for public comment: Acworth, GA; Rome, GA; Gadsden, AL; coping meetings were held at the beginning of the study in these same participation. All four meeting locations were determined to be within anyone who might have a major interest in the study.

provided to APC on November 26, 2019. Mr. Stover obtained the

Commenter ID	Commenter	Representing	Comment Date	Comment	Comment	
P-20	Brock Haiderer	Self	12/9/2019	A	Raising the Weiss Lake water level by 3 ft in the winter is a good idea for recreation.	The RP includes raising the win Final FR/SEIS acknowledges ar increase in winter pool levels.
P-21	Terry Brawner	Self	12/10/2019	A	Keeping water levels up (at Weiss Lake) will help the fishery and keep the people in the area longer to help the community in that area.	The RP includes raising the win Final FR/SEIS acknowledges ar increase in winter pool levels.
P-22	Michael Culberson	Self	12/10/2019	A	I, among many others, want to keep the water level of Weiss Lake up at least 3 ft higher than the current and past winter water levels.	The RP includes raising the win
P-22	Michael Culberson	Self	12/10/2019	В	This would help tourism, fishing, and other activities at a higher level. Weiss Lake depends on the water level to maintain many of the motel and other businesses in the area. We need your help.	Section 5.0 of the Final FR/SEIS associated with the proposed in
P-23	Joe Hayes	Self	12/10/2019	A	In favor to raise water level during winter months on Weiss Lake. Reasons: (1) navigational safety; (2) limited public boat ramp access at present winter pool level; (3) can't get to river channel from Brushy Branch boat ramp unless you have a duck boat type with GO-DEVIL motor or a flat bottom boat with small motor.	The RP includes raising the win Final FR/SEIS acknowledges ar increase in winter pool levels.
P-24	Glenn Brown	Self	12/10/2019	A	Raising of winter pool on Weiss Lake is long overdue. It will have a very important impact on Cherokee County, Alabama.	The RP includes raising the win Final FR/SEIS acknowledges ar proposed increase in winter poo
P-24	Glenn Brown	Self	12/10/2019	В	Metro Atlanta should be forced to conserve more before being allowed to steal water from Alabama area than from their area. They take water from our area and return the treated wastewater to another basin (Chattahoochee River). They should have to return as much water from where it came. It will cost them to do such but it should. Atlanta area has so many water leaks and wastes so much water!!!	The Metropolitan North Georgia most proactive water planning a of its water conservation and eff Allatoona Lake are the city of Ca the city of Cartersville is within the basin. In the case of CCMWA, is ACF River Basin (Chattahooche Chattahoochee River to meet th County return treated wastewate ACF river basins, the Cobb Coun- generally result in a small net tra- withdrawals and returns in this a detail in Appendix E, Section E.
P-25	Lamar Smith	Self	12/11/2019	A	My family owns 220 acre farm on Weiss Lake in Sand Valley area on County Road 63 in Cherokee County. We have two lakefront homes, 2 docks, and one boat ramp and 2 seawalls. Our concerns: we prefer 6 foot winter level draw down to do repairs to docks, jet ski lifts, boat ramp and seawalls.	USACE notes your desire to ma facilitate maintenance of docks pool level in Weiss Lake to elev- the winter pool level below eleva often that action might occur, we provisions of the FERC license
P-25	Lamar Smith	Self	12/11/2019	В	Also concerned higher winter level could result in more damage caused by winter flooding which often occurs Feb-Mar time frame.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake.
P-26	Mark Washington	Self	12/11/2019	A	Should be no change in the amount of water flowing across state line, even in dry seasons.	Modeling of the RP, which inclu- water supply needs, indicates the the Coosa River just downstrear line) compared to current flow co specifically discussed in Section E.3.2.2.2.2 of Appendix E.
P-27	Ronnie Shaw	Self	12/11/2019	А	Thanks for all of your help in understanding what's going on.	Thank you for attending the Gad
P-28	Helen Graham	Self	12/11/2019	A	We own a few lake lots (<i>Weiss Lake</i>). We need lower water levels in winter to do any maintenance work (seawalls, piers, etc.). This is our lively hood. Rentals bring income to our county.	USACE notes your desire to ma maintenance of docks and other in Weiss Lake to elevation 561 ff pool level below elevation 561 ff action might occur, would be the provisions of the FERC license
P-28	Helen Graham	Self	12/11/2019	В	We realize folks love to fish, so do we, but in winter, with lower water levels, cold weather permits (prevents) lots of this activity from happening. We live around the lake and know there's not a whole lot of recreational activities in winter months.	Under current operations at Wei from November 1 to March 1 ea during the public meetings for th when weather conditions might 561 ft would facilitate that recrea

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the recreational benefits associated with the proposed

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the recreational benefits associated with the proposed

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S acknowledges and documents the economic and recreational benefits acrease in winter pool levels.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the recreational benefits associated with the proposed

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of the nd documents the economic and recreational benefits associated with the ol levels.

a Water Planning District (covering the Metro Atlanta area) has one of the and water conservation and efficiency programs in the United States. Many ficiency program features are mandatory. The principal users of water from cartersville, GA and the CCMWA. The entire water supply service area for the ACT River Basin. Therefore, all returns of treated wastewater are to the a portion of its service area is in the ACT River Basin and a portion is in the ee River). CCMWA withdraws water from both Allatoona Lake and the ne needs of its service area. Two wastewater treatment plants in Cobb ter to Allatoona Lake. Because Cobb County straddles both the ACT and unty Water System's water supply and wastewater treatment operations ransfer of water from the ACT River Basin to the ACF River Basin. Water area are discussed in Section 3.1.1.5 of the Final FR/SEIS and in more .1.1.6.

a antain a 6-ft winter drawdown (to elevation 558 ft) at Weiss Lake to and other shoreline structures. If the current proposal to raise the winter vation 561 ft is approved as a result of this study, future decisions to lower ration 561 ft to facilitate maintenance of docks and other facilities, and how rould be the responsibility of APC, conducted in accordance with the specific for the APC Coosa River reservoirs.

nter pool at Weiss Lake to elevation 462 ft (from 460 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for

Ides reallocation of storage in Allatoona Lake to meet current and future hat there would be a negligible change in flow conditions at Mayo's Bar on im of Rome, GA (and a short distance above the Alabama/Georgia state conditions, even under severe drought conditions. These effects are n 5.1.2.2 of the Final FR/SEIS main report and in more detail in Section

dsden, AL public meeting and providing the positive feedback.

aintain a 6-ft winter drawdown (to elevation 558 ft) at Weiss Lake to facilitate er shoreline structures. If the current proposal to raise the winter pool level ft is approved as a result of this study, future decisions to lower the winter ft to facilitate maintenance of docks and other facilities, and how often that e responsibility of APC, conducted in accordance with the specific for the APC Coosa River reservoirs.

biss Lake, the guide curve (or target lake level) drops below elevation 561 ach year. Based on feedback to APC from many lake users and to USACE his study, there are often many days during these four months each year be conducive for boating on the lake. A higher winter pool level at elevation vational use of the lake during this period.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-28	Helen Graham	Self	12/11/2019	С	Will you lower the lake to allow us to do maintenance?	If the current proposal to raise the of this study, future decisions to of docks and other facilities, and
P-29	Charles Lawrence	Self	12/12/2019	A	Reduce water diversion at Allatoona; if allowed will disrupt Coosa water flow.	Modeling of the RP, which inclu water supply needs, indicates th the Coosa River just downstrear line) compared to current flow c specifically discussed in Section E.3.2.2.2.2 of Appendix E.
P-29	Charles Lawrence	Self	12/12/2019	В	Raise water level for Logan Martin in the winter from current 460 (<i>ft</i>) to 462 (<i>ft</i>). Better use of Logan Martin improves the fishery.	The RP includes raising the win of the Final FR/SEIS acknowled proposed increase in winter poo
P-30	James Bryan	Self	12/10/2019	A	As a property owner at Weiss Lake, I suffered over \$40,000 in damages when water levels rose to 572 feet in February 2019. I oppose any actions that may cause water levels to rise to 567 feet of greater. We start seeing minor damage to boat, lift, walkway and lift at 568 (ft) and major damage at 572 (ft). Having to constantly worry about winter water levels and the damage it may cause is of great concern and may cause us to sell this Weiss Lake property.	Modeling performed in conjunct operations, including the revised easements (572 ft) for Weiss La
P-31	Vivian Lewis	Self	12/11/2019	A	We would like to go on record as supporting the raising of the lake winter level by 3' in 2021. We have lived on Lake Weiss since 1967. By increasing the winter lake level would give us and thousands of others access to the Lake all year long. This would increase our level of happiness along with a quantum jump in property values in Cherokee County. A great benefit for Alabama Power is the substantial degradation of erosion which is acerbated by the raising and lowering of lake levels.	The RP includes raising the win acknowledges and documents t proposed increase in winter poo
P-32	Richard Healy	Self	12/12/2019	A	As a homeowner on the above subject lake (<i>Logan Martin</i>), I would be in favor of the higher winter lake levels for environmental reasons (aquatic breeding areas not going dry, lower soil erosion in the lake when raised in the spring).	The RP includes raising the win of the Final FR/SEIS acknowled proposed increase in winter poo
P-35	Garrett Burgess	Self	12/12/2019	A	My name is Garrett Burgess, I live in choccolocco creek (Logan Martin Lake). I wish the water level would stay at summer pool or close all year round. I'm not a fan of the look of winter pool, as i have always been told it's necessary, but I would vote to keep the water higher through the winter.	The RP includes raising the win would continue to provide for a storage that has been determine
P-36a	Donald Urso (Coosa Queen Riverboat)	Self	1/26/2020	A	I understand it is a flood control lake but I lost a houseboat 7 years ago because the lake level went below 460.0 and the 72 ft houseboat sunk. I now have another houseboat and it is very difficult when the level goes below winter pool. I also own the Coosa Queen Riverboat and If the winter level Was raised to 462.0 navigation would be so much easier.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-37a	Rebecca Berryhill	Self	1/26/2020	A	I sit just looking at a beautiful lake at least 4 months a year that we cant access the lake in boats etc because is low water that effects the bouysdocksslues and overall recreational use. Please raise our water level! Our city managers is correct people don't want to be out spending money going to the local restaurants new businesses don't want to come in because their business isn't supported routinelywe pay to live on a lake we can only access 1/2 a year or less!!	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-40	Sheila Brawner	Self	12/12/2019	A	Yes I would like for the water levels be 3 feet higher during winter months on Lake Weiss. It would help the economy by more people coming in winter months. Also the ones that live here would be able to enjoy fishing year round.	The RP includes raising the win acknowledges and documents t increase in winter pool levels.
P-41	Lee Wheeler	Self	12/12/2019	A	 (Quote from news article) - "U.S. Army Corps of Engineers has granted preliminary approval to higher winter pools at Weiss and Logan Martin lakes. The corps released a draft of its plans earlier this month, addressing Alabama Power's requests to increase normal winter pool levels at Weiss Lake by 3 feet and at Logan Martin by 2 feet. "While this is not the final approval, we are pleased that the corps agrees with our recommendations," said Herbie Johnson, Alabama Power's Hydro general manager. Final approval for the elevated lake levels as well as changes in flood operations is a multistep process, including consideration of comments the corps will receive over a 45-day public comment period, which will end Dec. 30. The corps also has scheduled four open houses, where the public can provide input." 	At the time the Draft FR/SEIS w approval" for higher winter pool article. After extensive analysis USACE Mobile District tentative Logan Martin lakes so the APC- flowage easements for those re FR/SEIS retains the raised winter
P-41	Lee Wheeler	Self	12/12/2019	В	If THE March 2018 flood had started with 3 feet higher, WATER LEVEL, THINK HOW MUCH WATER WOULD HAVE BEEN OUT OF THE BANKS	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. The spring 2019 fl easement. Under the proposed

the winter pool level in Weiss Lake to elevation 561 ft is approved as a result b lower the winter pool level below elevation 561 ft to facilitate maintenance d how often that action might occur, would be the responsibility of APC.

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational fishing benefits associated with the ol levels.

tion with the ACR Study has shown that the APC-proposed modified flood d winter guide curve, would remain within the current APC flowage ake.

nter pool at Weiss Lake to elevation 561 ft. Section 5.0 of the Final FR/SEIS the economic, recreational, and environmental benefits associated with the ol levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the environmental benefits associated with the ol levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). The RP winter pool drawdown from elevation 465 ft to 462 ft to provide flood ed to be necessary during that portion of the year.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and economic benefits associated with r pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and economic benefits associated with r pool levels.

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vas released for public review, USACE had not granted "preliminary I levels at Weiss and Logan Martin lakes as stated in the quoted news s of the effects of raising the winter pools, including potential flood effects, ely selected a plan that would include raising winter pool levels at Weiss and E-proposed modified flood operations would remain within the current APC eservoirs. Based on that detailed analysis, the RP presented in the Final ter pool levels at both APC lakes.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for flood event peaked at approximately elevation 571 ft, 1 ft below the flowage d plan, the reservoir would have been at the same elevation.

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-41a	Lee Wheeler	Self	12/16/2019	A	 (Quote from news article) - U.S. Army Corps of Engineers has granted preliminary approval to higher winter pools at Weiss and Logan Martin lakes. The corps released a draft of its plans earlier this month, addressing Alabama Power's requests to increase normal winter pool levels at Weiss Lake by 3 feet and at Logan Martin by 2 feet. "While this is not the final approval, we are pleased that the corps agrees with our recommendations," said Herbie Johnson, Alabama Power's Hydro general manager. Final approval for the elevated lake levels as well as changes in flood operations is a multistep process, including consideration of comments the corps will receive over a 45-day public comment period, which will end Dec. 30. The corps also has scheduled four open houses, where the public can provide input. 	At the time the Draft FR/SEIS w approval" for higher winter pool article. After extensive analysis USACE Mobile District tentative Logan Martin lakes so the APC- flowage easements for those rea FR/SEIS retains the raised winter
P-41a	Lee Wheeler	Self	12/16/2019	В	If THE March 2018 flood had started with 3 feet higher, WATER LEVEL, THINK HOW MUCH WATER WOULD HAVE BEEN OUT OF THE BANKS. Raising winter water level 3 feet (at Weiss Lake) Anyone that needs to calculate the damage of raising said 3 feet water level only has to google Weis lake flood Dec, 31 2015 common sense should provide the answer.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. The spring 2019 fl easement. Under the proposed
P-41b	Lee Wheeler	Self	12/16/2019	A	Any one that needs to calculate the damage of raising said 3 feet water level only has to google Weiss lake flood Dec,31 2015 common sense should provide the answer.	The RP includes raising the wind performed in conjunction with th including the revised winter guid Weiss Lake. The spring 2019 fl easement. Under the proposed
P-41c	Lee Wheeler	Self	12/17/2019	A	 (Quote from news article) - The U.S. Army Corps of Engineers has granted preliminary approval to higher winter pools at Weiss and Logan Martin lakes. The corps released a draft of its plans earlier this month, addressing Alabama Power's requests to increase normal winter pool levels at Weiss Lake by 3 feet and at Logan Martin by 2 feet. "While this is not the final approval, we are pleased that the corps agrees with our recommendations," said Herbie Johnson, Alabama Power's Hydro general manager. Final approval for the elevated lake levels as well as changes in flood operations is a multistep process, including consideration of comments the corps will receive over a 45-day public comment period, which will end Dec. 30. The corps also has scheduled four open houses, where the public can provide input. 	At the time the Draft FR/SEIS w approval" for higher winter pool article. After extensive analysis USACE Mobile District tentative Logan Martin lakes so the APC- flowage easements for those re FR/SEIS retains the raised winter
P-41c	Lee Wheeler	Self	12/17/2019	В	If THE March 2018 flood had started with 3 feet higher, WATER LEVEL, THINK HOW MUCH WATER WOULD HAVE BEEN OUT OF THE BANKS. If anyone needs to estimate the possible damage that raising the Lake Weiss December water level 3 feet can cause, just Google: Weiss Lake Flood Dec 31 2015 and common sense should provide the answer.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. The spring 2019 fl easement. Under the proposed
P-41c	Lee Wheeler	Self	12/17/2019	С	Let the Marinas dredge out in the area around them to get their 3 feet in the winter, as they have been doing for 50 years instead of making present land owners have to pay for the damages.	This recommendation is outside significant dredging in Weiss La in the comment.
P-41d	Lee Wheeler		12/26/2019	A	 (Comment starts with a figure showing Weiss Lake pool level at 560.98 ft on 12/26/2019) Please note and take into consideration, if the winter pool raise of 3 ft had been imposed at the date, (requested by the lady at the marina) we would now be at summer pool level with 2 days rain forecasted in the <u>next 3 days</u>. National Weather Service Forecast for Cedar Bluff AL Saturday - A 20 percent chance of showers. Cloudy, with a high near 67. Southeast wind around 5 mph. Saturday night - Showers likely, mainly after midnight. Cloudy, with a low around 64. Chance of precipitation is 60 percent. Sunday - Showers and possibly a thunderstorm. High near 69. Chance of precipitation is 100 percent. Sunday Night - Showers likely, mainly before midnight. Mostly cloudy, with a <u>low around 46. Chance of precipitation is 60 percent.</u> Knowing the lake below Gadsden has an easement of only 1 foot does not sound good for either lake. 	The RP includes raising the wint performed in conjunction with th including the revised winter guid Weiss Lake. APC considers ma actual rainfall that has occurred, conditions, and precipitation fore Coosa River Basin. Operating p downstream flooding that would
P-41e	Lee Wheeler	Self	12/28/2019	A	 (Comment starts with a figure showing Weiss Lake pool level at 560.98 ft on 12/26/2019) Please note and take into consideration, if the winter pool raise of 3 ft had been imposed at the date, (requested by the lady at the marina) we would now be at summer pool level with 2 days rain forecasted in the <u>next 3 days</u>. National Weather Service Forecast for Cedar Bluff AL Saturday - A 20 percent chance of showers. Cloudy, with a high near 67. Southeast wind around 5 mph. Saturday night - Showers likely, mainly after midnight. Cloudy, with a low around 64. Chance of precipitation is 60 percent. Sunday - Showers and possibly a thunderstorm. High near 69. Chance of precipitation is 100 percent. Sunday Night - Showers likely, mainly before midnight. Mostly cloudy, with a low around 46. Chance of precipitation is 60 percent. 	The RP includes raising the wint performed in conjunction with th including the revised winter guid Weiss Lake.

vas released for public review, USACE had not granted "preliminary levels at Weiss and Logan Martin lakes as stated in the quoted news s of the effects of raising the winter pools, including potential flood effects, ely selected a plan that would include raising winter pool levels at Weiss and -proposed modified flood operations would remain within the current APC eservoirs. Based on that detailed analysis, the RP presented in the Final ter pool levels at both APC lakes.

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for flood event peaked at approximately elevation 571 ft, 1 ft below the flowage d plan, the reservoir would have been at the same elevation.

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e the scope of the ACR Study. To our knowledge, marinas have not paid for ake over the last 50 years to provide sufficient depths for boaters, as stated

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for any factors in its reservoir operations during flood events. Some include I, current moisture of the soil, current reservoir levels, downstream recast. During flood events, unfavorable conditions can exist within the plans are developed to respond to unfavorable conditions and reduce d have occurred naturally.

ter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-41f	Lee Wheeler	Self	1/3/2020	A	(Emailed a screen shot of Extended Forecast for Cedar Bluff, AL for January 3-4, 2020 showing likely rain showers. No written email message provided.)	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. APC considers ma actual rainfall that has occurred conditions, and precipitation for
P-41g	Lee Wheeler	Self	1/2/2020	A	(Emailed a screen shot of [1] chart for Weiss Lake water level for January 2, 2020 at 557.67 ft msl and [2] Extended Forecast for Cedar Bluff, AL for January 2-3, 2020.) Weiss Lake Residents are lucky that the 3 feet Winter Drawdown Level has not been imposed yet at this time.	The RP includes raising the win performed in conjunction with the including the revised winter guid Weiss Lake. APC considers ma actual rainfall that has occurred conditions, and precipitation for
P-42	John Gilreath	Self	12/13/2019	A	This is in regards to the proposed change in elevation of Logan Martin lake in Alabama. We are in favor of the new proposed flood and winter elevations. Thank you for all you do as you continuously strive to improve this resource.	The RP includes raising the win the top of the flood pool to 473.
P-43	Donna Nicholson	Self	12/12/2019	A	I strongly request that you raise Logan Martin Lake at least 3-4' in the winter. There is no reason for it to be this low. It only hurts families and businesses! Thank you for at least reading my email! Resident on Logan Martin Lake.	The RP includes raising the win the current winter pool level. T 465 ft to 462 ft to provide flood s year.
P-46	Stanley Caufield	Self	12/12/2019	A	Please raise the winter level up (at Logan Martin Lake). By doing so I can actually get out of my boathouse to enjoy the lake. Thank you	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-51	Jennifer Joy	Self	12/12/2019	A	My name is Jennifer Joy and I live in Cropwell in the lake (<i>Logan Martin</i>) on the island near the Dam and Coosa Island Marina area. We have to get on a boat every morning in order to go to our car and then to work. Higher lake levels would greatly help. When they are at 460 it is extremely difficult to get to our dock. Our prop is damaged regularly. 462 would do wonders. I am very much in favor of raising the levels.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-52	Peter W.	Self	12/13/2019	A	Just be be very brief here. My thoughts are this lake (<i>Logan Martin</i>) is for flood control so if you raise the winter pool 2 feet you leave yourself open for floods of epic proportion. Last year for example the flood we had would have been much worse if were two feet higher in winter pool. Weiss Lake for example also was flooded for weeks. I have lived on Logan Martin Lake since 1974 and still remember the flood of 1977 that was the worse yet. Most people don't remember or lived here during that flood. Also the flood plane back then was 473.5.	The RP includes raising the win performed in conjunction with th including the revised winter guid Logan Martin Lake. The modeli in a lower Logan Martin pool ele
P-58	Steve & Karen Oliver	Self	12/13/2019	A	As a full time resident we would encourage and support the winter pool at 462 feet (<i>Logan Martin Lake</i>). This would allow us to do repairs and extend our boating season. We reside at (<i>address redacted</i>) located at the mouth of Chocolocco Creek. Thank you for this consideration.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-60	Wendy Webber	Self	12/13/2019	A	I live on Coosa Island & just want you to know that myself & all my neighbors would love the lake levels to stay raised in the winter. I truly believe so much garbage goes in the lake while levels are low in the winter. Please & I mean pretty please consider raising the lake level water during the winter. Sometimes it's nice too to be able to bundle up & take a boat ride. We truly love the lake year round. Raising the level of Logan Martin Lake would be Awesome in so many respects. Thank you so much for your consideration & may all if you have a Merry Christmas & Happy New Year!	The RP includes raising the win the current winter pool level. Th 465 ft to 462 ft to provide flood s year. Section 5.0 of the Final F benefits associated with the pro
P-65	Will Ebbert	Self	12/13/2019	A	I was writing to say that I support raising the winter lake level of Logan Martin. I live on Choccolocco Creek and the higher levels would let us get our boat out year round to enjoy the lake. Thanks!	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-66	Sandra & Ricky Perkins (Clear Creek RV Resort)	Self (Managers at Clear Creek RV Resort, Talladega, AL)	12/13/2019	A	Please let the water level come back up we are Managers at Clear Creek RV Resort in Talladega, Alabama and we would really appreciate the lake level not going down so much during the winter. I am hoping that if you could allow it to come back up some we could allow our members to still launch their boats at our place instead of having to go other places. Thank you for your cooperation in this matter.	The RP includes raising the win the current winter pool level. T 465 ft to 462 ft to provide flood s year. Section 5.0 of the Final F with the proposed increase in w
P-68	Pamela Galbreath	Self	12/13/2019	A	We live at (<i>address redacted</i>) in Talladega Alabama. Please leave lake levels up year around so that we can enjoy fishing and water activities all year. In our area, there are more pontoons that bass boats. Water level doesn't come up enough until after crappie season. And we really enjoy evening sunsets drives, but don't get to do into the fall due to lower lake levels. Sad!!	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-69	Kimberly Smith	Self	12/13/2019	A	Hello, my name is Kimberly Smith, and I am a homeowner on Logan Martin (<i>address redacted</i>). I just want to register my support for raising the winter pool level by two feet. This change would be the difference for us in being able to use our boat year round from our dock. At winter level we have about six inches of water at our dock, while neighbors further back in the slough have no water and that part looks like a mud hole at the moment. Increasing the level will make a huge difference for all of us here. Thank you for your consideration.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for any factors in its reservoir operations during flood events. Some include I, current moisture of the soil, current reservoir levels, downstream recast.

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for any factors in its reservoir operations during flood events. Some include I, current moisture of the soil, current reservoir levels, downstream recast.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft) and lowering 5 ft (from 477 ft).

nter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above The RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for ling did include an evaluation of the 1977 flood and revised operation results evation compared to historic conditions.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above he RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the R/SEIS acknowledges and documents the recreational and environmental posed increase in winter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above The RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the R/SEIS acknowledges and documents the recreational benefits associated *v*inter pool levels.

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Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-73	Theresa Hammond	Self	12/13/2019	A	Please leave our lake levels up in the winter (Logan Martin). Dropping the level limits our use of the lake in areas.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-74	Carl Wyatt	Self	12/14/2019	A	I live on Logan Martin Lake on the main river channel at . I retired to the lake to enjoy my retirement years fishing. Unfortunately during the winter months when Alabama Power Company lowers the water to winter pool, I cannot get any of our three boats in the water because the front of the boat lift remains out of the water approximately 18 inches. I spent close to \$50,000 building a new boat dock only to have the same issue. Raising the winter water pool level 2 feet would allow me to lower any of my boats into the water and we could enjoy winter fishing. At the present time, we are required to trailer one of our boats approximately four miles to a boat ramp to fish or to trailer the boat to another lake to enjoy winter fishing. If the water level were raised it would allow us to walk down to the dock, lower the boat into the water and enjoy a day of fishing during the winter months. Many of my neighbors express the same issues and would like to see the level raised two feet so they could enjoy the lake during the winter.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-75	Bobby Tidwell	Self	12/14/2019	A	I would like to Express my concerns over raising winter pool 2 feet (<i>at Logan Martin Lake</i>). We have already had multiple floods in the winter and my place didn't get flooded but if the winter pool had of been raised 2 feet as its proposed then it would have. Due to my concerns I had rather leave it as is or lower the level further. Do not raise winter pool please. I am in the upper river area of Kikers campground.	The RP includes raising the win performed in conjunction with the including the revised winter guid Logan Martin Lake.
P-76	Donna Smith	Self	12/14/2019	A	Please leave our lake levels up in the winter. Dropping the level limits our use of the lake (<i>Logan Martin</i>) in areas. We live on (<i>address redacted</i>) in Riverside making it impossible to get our boat out in the winter.	The RP includes raising the wir the Final FR/SEIS acknowledge increase in winter pool levels.
P-77	Martha Jenkins	Self	12/14/2019	A	We live in a slough off Rabbit Branch and are in favor of raising the winter pool (<i>at Logan Martin Lake</i>). Two feet would improve our view and enjoyment of our home as well as increase the value of our home. See pictures attached. We also have an issue of people driving ATVs on the lake bed of our slough when water is at current winter level. Thank you for considering raising the winter pool.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-79	Kim Jordan	Self	12/14/2019	A	We are located in the area of Camp Cosby. We would like the water (at Logan Martin Lake) TO BE RAISED. We spend a lot of money to be on the lake and we would like to be able to enjoy it year around.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-80	Sean Connelly	Self	12/14/2019	A	I believe that lake level (<i>Logan Martin</i>) should stay at full pool. I am on clear creek and the winter levels dont allow me to use my boat at all. My name is Sean Connelly and I am located at the back of clear creek.	The RP includes raising the win the current winter pool level. Th 465 ft to 462 ft to provide flood year. Section 5.0 of the Final F with the proposed increase in w
P-81	Mark Thornton	Self	12/14/2019	A	Would like the lake (<i>Logan Martin</i>) to stay close to full pool year around, this would improve fishing and the aesthetics of the lake. Choccolocco creek area.	The RP includes raising the win would continue to provide for a storage that has been determin FR/SEIS acknowledges and do proposed increase in winter poo
P-84	Christopher Ray	Self	12/16/2019	A	As a owner of property and resident that resides on Neely Henry, I am concerned w/ the impact this may have on our lake water levels throughout the year during both normal operations and drought operations. As you are aware, a majority of the Coosa River is shallow and a change in just a few inches in water depth can have a material impact to the recreation use of the lake. As a resident and one who works for a bank that lends to developers and residences on the water, it is extremely important to preserve the value of water front property by not adversely impacting its useability and attractiveness.	Model simulation of reservoir op indicate that additional withdraw Weiss and Logan Martin lakes, surface elevations in H. Neely H Section 5.1.1.2 (page 5-16) of tt (page E-182) of Appendix E. W temporarily drawn down to facil operations in the basin.
P-85	Kenneth Jones	Self	12/16/2019	A	My name is Kenneth Jones and I would like to see the lake level (<i>at Logan Martin Lake</i>) be raised in the winter because in the area of coosa island where I'm at the level gets so low that it's dangerous to even get on the water and people have a hard time using boat ramps in the area. Thanks.	The RP includes raising the wir of the Final FR/SEIS acknowled increase in winter pool levels.
P-89	Steve Hogg	Self	12/17/2019	A	I would love the lake level (<i>Logan Martin</i>) to remain at summer levels year round. That may not work for flood control, but the higher you keep the level, the longer you keep it up the better. Thanks!	The RP includes raising the win the current winter pool level. The 465 ft to 462 ft to provide flood year.
P-90	John & Sherry Watkins	Self	12/17/2019	A	I think leaving the lake (Logan Martin) a little higher during the winter months will let folks use the lake more.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-90	John & Sherry Watkins	Self	12/17/2019	В	I think weather forecasting today is much better and will afford APC to manage water levels	USACE concurs. Weather fore forecast information provided by

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5 of es and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and economic benefits associated with r pool levels.

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hter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above he RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the R/SEIS acknowledges and documents the recreational benefits associated vinter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). The RP winter pool drawdown from elevation 465 ft to 462 ft to provide flood ed to be necessary during that portion of the year. Section 5.0 of the Final cuments the recreational and aesthetic benefits associated with the ol levels.

perations in the ACT River Basin using a 73-year hydrologic period of record vals for water supply at Allatoona Lake and modified flood operations at as included in the RP, would have a negligible overall impact on water Henry Lake compared to current conditions. These effects are discussed in he Final FR/SEIS main report and in more detail in Section E.3.2.1.2.3 Vith the onset of significant flood events, the H. Neely Henry pool might be itate the passage of flood waters as an operational element of APC flood

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casting continues to improve. APC and USACE reservoir operations use y NOAA.

Commenter			Comment	Comment		
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P-93	Bill Dunn	Self	12/17/2019	A	I would love to see the winter lake levels (<i>at Logan Martin Lake</i>) left up or at least no lower than 2 ft below normal. I believe it would be beneficial to all concerned living round the lake as well as those who would want to use it. I truly believe it could have an economic impact. I have lived on the lake for 34 years and I first moved here the level went down in the winter but not nearly as much as it does now. Thanks for listening.	The RP includes raising the win the current winter pool level. Th 465 ft to 462 ft to provide flood year. Section 5.0 of the Final F with the proposed increase in w
P-94	Tim Ketterman	Self	12/17/2019	A	Yes, please raise the winter pool (at Logan Martin Lake)! I live on (address redacted) on Choccolocco Creek and 2 more feet would allow me and most of my neighbors to get our boats down and out all year. This is Tim Ketterman.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-95	Jennifer Ebbert	Self	12/17/2019	A	Please, please leave the lake level (<i>Logan Martin</i>) up in the winter. Not only does it help homeowners on the water, but the economic impact to Lincoln and Pell City restaurants, hotels, shops, and gas stations is definitely needed. Thank you for considering this.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-96	Lloyd Hofer	Self	12/17/2019	A	I am a 72 year old retired resident living directly on Weiss Lake, and have current flood control concerns for Weiss Lake. I do not want to support raising Weiss Lake winter level from 558 to 561 feet until they are more effectively managed and addressed. Weiss Lake contains 10% of the conservation storage in the entire ATC basin, and there are 5,270 square miles of drainage area above Weiss Dam most in Georgia. Increasing Weiss Lake winter pool 3 feet will reduce the capacity of Weiss Lake to absorb rain and snow melt which varies significantly each year. Several sections from Appendix B Weiss Dam and Lake November 2019 from the USACE website highlight the importance of flood control at Weiss Dam and Lake. Section 8-02 of Appendix B - reads "The flood regulation plan for Weiss Reservoir will provide substantial reductions in downstream flood peaks during minor and moderate floods. The limited amount of storage allocated to flood risk management will" Later Section 8-02 states since the amount of flood risk management storage varies seasonally, the degree of control that Weiss Dam can exercise on floods of the same magnitude will vary with the time of the year. A number of floods of different magnitudes were routed through Weiss Reservoir," Section 8-02 describes accurately Weiss Reservoir's current limited capacity to mitigate flooding, and raising the winter lake level 3 feet will further reduce the current limited capacity for Weiss Lake in flood control. Section 8-01 of Appendix B states: "The areas which may be appreciably affected by flood risk management operations include the 50-mile reach of the Coosa River flood plain between the dam and Gadsden and the City of Gadsden itself. The operation of Weiss Dam will also afford some reduction in flood heights below Gadsden."	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. APC considers ma actual rainfall that has occurred conditions, and precipitation for flood events. The modified oper the effectiveness of the reservo NAA (current operations) for the during this period, slightly highe Gadsden, AL. The resultant riv
P-96	Lloyd Hofer	Self	12/17/2019	В	 When winter rains raise water levels rapidly on our properties here in Cherokee County above Weiss Dam, I visit the Weiss Dam spill way and find very little water is being released to effectively manage the rapid rising levels of water into the Weiss Lake. Water levels in Weiss Lake are spread very far into the easement area before there is a substantial release of water from the Weiss spill way. I am told Weiss Lake water is not released as fast as necessary to prevent flooding here in Cherokee County because of concern for flooding in Gadsden City and area. Allowing 3 feet more in the winter Weiss Lake pool can only exacerbate flooding and flood control issues in the Weiss Lake area. Attached are several pictures of the debris and flood waters at my Weiss Lake property which takes money, time and effort to clean up once the flood waters recede. 	The RP includes raising the win performed in conjunction with the including the revised winter guid Weiss Lake. APC considers match actual rainfall that has occurred conditions and precipitation fore events. The modified operation, effectiveness of the reservoir. H upper portion of surcharge flood downstream river levels will occur levels remain below what would
P-96	Lloyd Hofer	Self	12/17/2019	С	Before supporting a winter lake level increase, I ask USACE to develop and implement a more effective flood control plan for current flood management in Weiss Lake, especially in a more rapid release of water downstream from the Weiss Dam. Please release water downstream in a fashion that allows flood control along the entire Coosa River and not to just select areas below Weiss Lake. I think you will agree - No area wants or needs to be flooded.	USACE concurs. The intent of conditions both upstream and d Weiss Lake to elevation 561 ft (shown that the APC-proposed r remain within the current APC ft limited to evaluating the Coosa modified flood operations propo
P-98	Charles Lynn Lawrence	Self	12/18/2019	A	As property owner on Lake Logan Martin I am in full support of raising the winter water level of Logan Martin to Four Hundred and Sixty Two feet (462ft). Will improve the overall fishery of the lake by increasing available spawning areas for the fish species found in the lake. Boating safety will be improved as Logan Martin has multiple submerged hazards throughout the lake that are just below the current 460ft winter level. The additional two feet will cover the hazards an improve boating safety Improved recreational use with higher water levels to allow year around use. Will improve the water level during periods of drought such as the drought periods just recently experienced. Higher winter water level will not change or modify the Alabama Power Flood easement level of 473.5 feet. The higher level will help ensure a stable water level even as additional water is diverted to meet the water needs and diversion of water for Atlanta.	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w

nter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above he RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the R/SEIS acknowledges and documents the recreational benefits associated vinter pool levels.

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic and recreational benefits associated with r pool levels.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for any factors in its reservoir operations during flood events. Some include I, current moisture of the soil, current reservoir levels, downstream recast. Weiss Lake was designed to provide benefit for minor to moderate ration, which includes a reduction in winter flood storage, does not change ir. However, because Weiss does release more water compared to the e upper portion of surcharge flood storage (elevation greater than 569 ft), er downstream river levels will occur from the spillway to just upstream of ver levels remain below what would have occurred under natural conditions.

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for any factors in its reservoir operations during flood events. Some include d, current moisture of the soil, current reservoir levels, downstream ecast. Weiss Lake was designed to provide benefit for minor to moderate h, which includes a reduction in winter flood storage does not change the However, because Weiss does release more water compared to the NAA for d storage (elevation greater than 569 ft), during this period slightly higher cur from the spillway to just upstream of Gadsden, AL. The resultant river d have occurred under natural conditions.

the flood operation is to reduce the impacts that would occur under natural downstream of the reservoir. The RP includes raising the winter pool at (from 558 ft). Modeling performed in conjunction with the ACR Study has modified flood operations, including the revised winter guide curve, would flowage easements for Weiss Lake. The scope of the USACE effort was River modified operation as submitted by APC. No variations to APC's basal are included in this study.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the environmental and recreational benefits associated *v*inter pool levels.

Commenter			Comment	Comment		
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P-99	Nancy Douglas	Self	12/18/2019	A	I would like to understand the changes to flood operation that is under consideration. I would be in favor of a 2' rise in winter level as long as the flood level/frequency did not increase. I know that Logan Martin is a flood lake. We get a flood every couple of years which is lots of work to clean up If the level was increased in winter, would we expect the river to flood more often and higher? I see the water go up and down quickly sometimes so know that there is the ability to control the level quickly if wanted.	The RP includes raising the win performed in conjunction with th including the revised winter guid Logan Martin Lake. The modeli the Logan Martin project operation
P-100	David & Arlene Johnson	Self	12/18/2019	A	 Higher water levels (<i>at Logan Martin lake</i>) in the winter would have the following effects in our lives: Pros: o Potentially wouldn't have to spend \$75/month to store boat 6 to 7 months a year o Could take advantage of nice fall/winter/spring weather and get out on lake - extend season o Have more fishing opportunities from pier or in boat o Better for Water Testing Site - more water present 	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w
P-100	David & Arlene Johnson	Self	12/18/2019	В	 Cons: o Couldn't check pilings/under pier for repair issues o Couldn't clean up the shoreline as needed - debris, litter, weeds o In times of flooding which is usually during lower levels - floods would be catastrophic if level started higher o if drought occurred would levels change to leave boats stranded In low areas? 	USACE notes your stated conce winter pool level at Logan Martin level to elevation 462 ft is appro- pool to 460 ft in selected years to Such decisions to temporarily lo responsibility of APC. Modeling proposed modified flood operati- current APC flowage easements drought conditions, Logan Marti- current operations.
P-101	Wade Cole	Self	12/18/2019	A	I live on Logan Martin in the Mays bend area of the lake. I would love if the lake level would stay up year round. I can't get my boats out of my boat house in the winter time lake level. It would make everyone's property value go up also.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-103	Dan and Phyllis Simpson	Self	12/18/2019	A	We are Dan and Phyllis Simpson, (<i>address redacted</i>). We are much in favor of lake levels staying up during winter months to benefit lake environment and lake dwellers who aren't fortunate to have year round water. Please take our request in consideration.	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w
P-106	Bruce Keen	Self	12/18/2019	A	I wanted to reach out via email to offer my support in raising Logan Martin winter pool from 460 to 462. Having lived on the lake for 9 years I've personally experienced the positive impact raising the lake has on the local community, not to mention the wildlife and fishing. Thanks for the time to consider this change and for accepting my support.	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w
P-108	Jim Williams	Self	12/19/2019	A	I have a house 1 mile north of Stemley Bridge on Logan Martin Lake. I applaud the consideration to keep lake levels up by additional 2ft in winter, I would like to see the draw down begin later in Fall. Some of our best weather for lake use is the month of October, but lowering the lake beginning in early October begins exposing underwater hazards too early.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-109	William Brom	Self	12/19/2019	A	It would be great if the lake level (<i>Logan Martin</i>) stayed at "full pool" (or close) year round. As far as "making dock repairs", the lake could be dropped for a short time to let folks do their repairs. Thank you!	The RP includes raising the win the current winter pool level. Th 465 ft to 462 ft to provide flood s year. Most dock repairs could of owners could also request winter dock maintenance. APC decision facilitate maintenance of permitte accordance with the specific pro-
P-110	Jeff & Sherry Davis	Self	12/19/2019	A	My husband and I support raising the Logan Martin Lake levels up in the winter. We live on a slew and would to be able to do things in the water like the main channel has. The increase in levels should also increase the value of our homes. Thank you.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-113	Jim & Pat Sparks	Self	12/18/2019	A	We would like for the lake level (<i>at Logan Martin Lake</i>) to stay up during the winter months. It is sort of useless having a lake too low to put a boat in. There are plenty of warm days that we would and could have a boat ride but can't because we can take the boat out.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-116	Doug Adamson	Self	12/20/2019	A	A quick note to voice support for the winter pool level of 462 (<i>at Logan Martin Lake</i>) based on my understanding from the materials published indicating that actions will be taken to increase the flow thru the LML dam at times of flooding such that additional damage from flooding will not occur due to a higher starting level.	The RP includes raising the win performed in conjunction with th including the revised winter guid Logan Martin Lake.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for ling results do not indicate an increase in peak river levels downstream of ting under the RP.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the environmental and recreational benefits associated *v*inter pool levels.

erns and potential limitations associated with the proposed raising of the in Lake from 460 ft to 462 ft. If the current proposal to raise the winter pool oved as a result of this study, it is possible APC could opt to lower the winter to facilitate maintenance of docks and other facilities and shoreline cleanup. ower the pool below the revised winter guide curve would be the g performed in conjunction with the ACR Study has shown that the APCions, including the revised winter guide curve, would remain within the is for Logan Martin Lake. Modeling has also shown that, under severe in Lake pool levels would be equal to or higher than levels would be under

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic and recreational benefits associated with r pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the environmental and recreational benefits associated *v*inter pool levels.

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

hter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above he RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the continue to be performed during the revised winter drawdown period. Dock er drawdowns from APC below elevation 462 ft in selected years to facilitate ions to conduct periodic drawdowns below the revised winter guide curve to ted docks, boathouses, and other facilities would be conducted in ovisions of the FERC license for the APC Coosa River reservoirs.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic and recreational benefits associated with r pool levels.

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Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-116	Doug Adamson	Self	12/20/2019	В	We have been home owners on LML for 12 years, and in that time have seen flooding multiple times that would have been significantly more impactful if the level had crested ~2 feet higher. For example, electrical breaker box and sprinkler control system on boat house under water, and wave action caused by wind and boat traffic putting water near roof of outbuilding, etc.	The RP includes raising the win performed in conjunction with th including the revised winter guid Logan Martin Lake. Increasing reservoir elevation during flood
P-117	Al Guido	Self	12/20/2019	A	I am contacting you regarding a newsletter from the Corps of Engineers regarding the request for the higher winter water level of 462 of Logan Martin Lake. I understand the public comment period ends 1/29/2020. I very strongly support the higher winter water level. I live in the Harmon Island area of Logan Martin Lake. Raising the level to 462 would enable me and our winter visitors to fish more in the early spring, and enjoy recreation opportunities on the lake not now available. Thank you for your attention.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-118	James Starnes	Self	12/20/2019	A	My residence is on Rabbitt Branch of Logan Martin Lake in St. Clair County, Alabama, I fully support the reallocation of water as proposed. A higher winter water level will greatly enhance the recreational use of the Lake and will make boat access much easier.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-119	Frederick Crown	Self	12/20/2019	A	We have a home on Logan Martin Lake at the end of Curry Branch in Talladega County, Alabama. We strongly urge the Corps to increase the winter pool level on Logan Martin Lake to 462 feet. In the current configuration, winter pool means no water in front of our house. There is a creek bed that may have a few inches of water, but usually there is very little. We would like to have water so that we can use our inflatable boat for exercise and recreation. Also, we enjoy seeing water birds, fish and turtles, but with no water, there is no wildlife. Raising the level to 462 feet would mean a slower draw down in the Fall and a quicker filling in Spring creating more opportunities for these activities. Please ratify the change to 462 feet for the winter pool guideline. Thank you for your consideration.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-121	Larry G.	Self	12/20/2019	А	I live on Logan Martin Lake and I am very much in favor of increasing the winter pool level by 2 ft to 462 ft.	The RP includes raising the win
P-121	Larry G.	Self	12/20/2019	В	I disagree with increasing the flow to the city of Atlanta. Georgia and Atlanta should be building new Reservoirs to satisfy their growth.	Modeling conducted during this Lake by the city of Cartersville, Coosa River at the Alabama/Ge Atlanta to meet current and futu on wetlands and fish and wildlift ACT River Basin upstream of Lo the established water supply ne
P-122	Vicky Pearson	Self	12/21/2019	A	Please consider raising the winter water level 2 feet on Lake Logan Martin lake in Alabama. We live on the lake and would appreciate the deeper winter water level for fishing and it would look so much better.	The RP includes raising the win
P-123	Elise Hammond	Self	12/21/2019	A	My wife and I have been property owners on Logan Martin Lake on Clear Creek in Talladega County. We have been hopeful over the last several years as news emerged from time to time about discussions for a higher winter pool level. We are very encouraged by the latest developments that the proposals may actually be moving closer to reality. We want to add our enthusiastic support for approval of any plan to increase the winter pool level. It would greatly increase the ability of the lake property owners to take advantage of boating and fishing during winter months.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-123	Elise Hammond	Self	12/21/2019	В	We also recognize the advantages to the Corps and to APC for more flood flexibility and greater power power generation reserves. We appreciate your consideration to move forward in approval of the proposed increase to winter pool.	The RP does provide for the over minimal effects on other project
P-124	Marshall Watson	Self	12/21/2019	A	We and that means all of the residents of Willingham Estates support the increase. The winter time erosion is causing our slough to lose water depth. I have lost two feet the past ten years. We are in the Clear Creek area of the lake (<i>Logan Martin</i>).	The RP includes raising the win of the Final FR/SEIS acknowled winter pool levels.
P-125	A. Kelly	Self	12/22/2019	A	I have been a fulltime resident on Logan Martin lake in the cropwell area for over 10 years. I look forward to the higher winter lake level and believe this change will be beneficial from both a recreational and environmental perspective	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w
P-126	Rob Staniszekski	Self	12/22/2019	A	I would be in favor of a higher level of the lake (<i>Logan Martin</i>) during the winter months if feasible. The % of folks who need to work on their dock is minuscule in comparison to the folks who could enjoy the water in the cooler months. Or at best, maintain the lower level for perhaps 1 month for folks to work on their dock. Mays Bend Rd area.	The RP includes raising the win the current winter pool level. Th 465 ft to 462 ft to provide flood s year. Most dock repairs could o owners could also request winter dock maintenance. APC decisis facilitate maintenance of permit accordance with the specific pro-

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for the winter level by 2 ft does not translate to a 2-ft increase in the peak operation.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft).

study has shown that increased water supply withdrawals from Allatoona GA and the CCMWA would have a negligible effect on flow conditions in the eorgia state line. Construction of new water supply reservoirs northwest of are water supply needs would be extremely costly, cause significant impacts the resources, and result in essentially the same net loss of water from the ogan Martin Lake as the reallocation of storage in Allatoona Lake to meet eeds.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft).

hter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic and recreational benefits associated with r pool levels.

rerall balance of flood risk management benefits and recreation benefits with t purposes.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the benefits associated with the proposed increase in

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and environmental benefits associated *v*inter pool levels.

hter pool at Logan Martin Lake to elevation 462 ft, an increase of 2 ft above he RP would continue to provide for a winter pool drawdown from elevation storage that has been determined to be necessary during that portion of the continue to be performed during the revised winter drawdown period. Dock er drawdowns from APC below elevation 462 ft in selected years to facilitate ions to conduct periodic drawdowns below the revised winter guide curve to ted docks, boathouses, and other facilities would be conducted in ovisions of the FERC license for the APC Coosa River reservoirs.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-127a	Nora Stokes	Self	12/22/2019	A	We are homeowners on the lake and support the initiative to raise the lake levels by at least two feet. That would allow full time use of our boat for fishing and other water activities. Currently we ask our visitors to only visit when the lake levels are up so we can enjoy boating.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-128	Glen Gardner	Self	12/22/2019	A	Please leave the winter lake level (at Logan Martin Lake) up to 462 (ft). It was so nice to be able to get my pontoon out and see the winter foliage, the last time you did this. Thanks.	The RP includes raising the win
P-130	Steve & Barbara Bishop	Self	12/23/2019	A	We live on the Lincoln side of Logan Martin Lake and do not have lake access once the lake levels begin to drop. Any consideration you could give to maintaining a higher lake level would be greatly appreciated. A higher lake level would give us access to the water from our boathouse an additional 2-3 months of the year.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-131	Charles Romanus	Self	12/23/2019	A	I have read the Executive Summary contained in the Subj report as well as the supporting documentation. Although most of the report and its proposed actions do not affect me, I am would like to voice my approval, as a recreational user, to the proposed raising of the WINTER POOL on Logan Martin Lake. By raising the winter pool level, I will have increased ability to launch and recover my pontoon boat. Additionally, with the increased water level, presumably there will be a greater ability to fish around the sloughs and coves of Logan Martin Lake.	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w
P-131	Charles Romanus	Self	12/23/2019	В	You and your contractor are to be congratulated on the depth and scope of your Feasibility Report.	Thank you for the positive feed
P-132	Jerry & Patricia Culberson	Self	12/23/2019	A	I support the proposed changes in winter lake levels for the above referenced lakes (<i>Weiss, Logan Martin, and Allatoona</i>). Higher water levels for these lakes in winter will be a very big improvement. We would be able to use many boat ramp sites that are now closed in winter, due to low water. Natural fish habitat will be protected from further decay, due to less exposure to sun and dry air in winter. Local economies will improve, due to more lake access and safer navigation of lakes in winter months. Water pollution will be less due to more water in lakes – " more water dilution equals less pollution." Again, we support the proposed increase in winter lake levels. I hope it happens soon.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-135	Diane Scoggins	Self	12/25/2019	A	We have had a lot on Lake Weiss for 5 years, we have flooded twice. On Christmas night 3 years ago we got 5 inches of rain. The water level was at the winter level, our damage would have been worse at 3 ft. up. In the spring our damage was worse because the level was 2 foot below full pool.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. Increasing the win elevation during flood operation
P-135	Diane Scoggins	Self	12/25/2019	В	During our dry months of September and October would be a good time to leave the levels up and start in November going to the lower levels, we would have 3 extra months of activity. Other wise I would vote to do nothing.	The scope of the USACE ACR submitted by APC. No variation
P-136	Pat Sparks	Self	12/24/2019	A	Could it be a possibility that the winter lake level (<i>at Logan Martin Lake</i>) be shortened? Possibly after the winter rains have passed or leave it up longer during the summer? We would have time to work on seawalls, get debit cleaned out, and still have access to be able to boat on nice days!	The scope of the USACE study submitted by APC. No variation
P-137	Lee Issacs	Self	12/26/2019	A	I would like to declair my voice in favor of raising the winter water level (at Logan Martin Lake) from 460' to 462' as per APC's request. Raising the levels 2 feet would allow round water access to my pier.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-139	Steve Dycus	Self	12/26/2019	A	We would love to have the lake level in the winter brought up to 462.0 (ft) and the flood level dropped to 473 (<i>ft</i>). We are all wondering if this is even possible. More than anything we would love the flood level brought down to 473 (<i>ft</i>) instead of the 477 (<i>ft</i>) that's in place. Thank you.	The RP includes raising the win analysis has demonstrated that higher winter pool level (462 ft), current flowage easements arou easements acquired by APC.
P-140	WMJ	Self	12/29/2019	A	I would like to go on record as opposing the proposed winter water level raise from 6 feet to 3 feet (<i>at Weiss Lake</i>). As a full time lake front resident (not like most of those individuals that are pushing the change and live in town or a subdivision away from the lake), my reasons for opposing the change are as follows: 1. It would afford greater opportunities for flooding. We just this past year experienced the worst flooding possibly since the lake was constructed. Just this past week, in fact, we experienced a rainfall that raised the lake level almost 3 feet from near winter (6 foot) level. This would seem to be a good example of what "could" happen (or worse) in the future. On many occasions I have been told that Lake Weiss is a "flood control" lake not a "recreation" lake.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake (572 ft). Increasing reservoir elevation during flood
P-140	WMJ	Self	12/29/2019	В	2. It would prevent, or make it extremely hard, for me and other lake front owners from doing necessary repairs to our docks. In fact, I am still working on repairs from the last flood.	If the proposal to raise the winter conduct periodic temporary draw facilities around the lake, condu APC Coosa River reservoirs.

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nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and environmental benefits associated vinter pool levels.

back on the report.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic, recreational, and environmental benefits ncrease in winter pool levels.

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for hter level by 3 ft does not translate to a 3-ft increase in the peak reservoir

Study was limited to evaluating the Coosa River modified flood operation as ns to APC's modified flood operations proposal are included in this study.

was limited to evaluating the Coosa River modified flood operation as ns to APC's modified flood operations proposal are included in this study.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Technical the APC-proposed modified flood operations at Logan Martin Dam, with the could be conducted so flood events would not be expected to exceed the und the lake (elevation 473.5 ft) and within the downstream flowage

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for g the winter level by 3 ft does not translate to a 3-ft increase in the peak operation.

er pool level at Weiss Lake from 558 ft to 561 ft is approved, APC could still wdowns below elevation 561 ft to facilitate repairs to docks and other ucted in accordance with the specific provisions of the FERC license for the

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-140	WMJ	Self	12/29/2019	С	3. I do not agree with the statements that many are making regarding more water in the winter will bring in more fishermen. It has been my observation, having lived at my present location for 22 years, and having fished this lake for over 40 years, that those individuals that really want to fish will do so no matter what the lake level is. As far as recreation is concerned, I don't really believe there are very many (if any)individuals that are going to swim or ski in the winter no matter what the water level is.	Under current operations at We the year) drops below 561 ft on there are typically many days w pool level during this period wou area and access to areas that m the lake would not generally be
P-140	WMJ	Self	12/29/2019	D	In closing I would like to reiterate what I said earlier: Lake Weiss is a flood control lake not a recreation lake.	Weiss Lake was constructed by Power Act, Weiss Lake was also downstream navigation. The pr benefits incidental to its primary additional flood storage.
P-142	Isabella Trussell	Self	12/22/2019	A	As a board member of Logan Martin Lake Protection Association, a Water Quality Committee member and a Logan Martin Lake resident, I am glad to see that the TSP includes the additional two feet for Logan Martin's winter pool. Our group has pursued this goal beginning with the FERC relicensing process in the early 2000's and has continued its pursuit in a number of meetings over the years with various personnel from the Mobile District. This has been a long time coming, and, yes, I know we are not there yet.	The RP includes raising the win
P-142	Isabella Trussell	Self	12/22/2019	В	An additional potential benefit to the many benefits listed in the document is the potential increase in water clarity due to less shoreline "mudflats" that can be disturbed, especially during spring storms. Although the recreational and esthetic improvements are fairly obvious to all, the increased property values (more tax dollars) and financial benefit to those with lake-related businesses—almost all the businesses here have some relation to the lake, either from residents or visitors—are obvious to those of us who live here.	Section 5.0 of the Final FR/SEIS benefits associated with the pro
P-142	Isabella Trussell	Self	12/22/2019	С	I am also pleased to see that the surcharge level is being reduced to 473.5 feet, which aligns with APC's purchased flowage easement at Logan Martin dam. I have lived here since 1974 and have only experienced one episode of flooding outside of APC's easement, in the 1970's.	The RP does include a reductio ft to 473.5 ft.
P-142	Isabella Trussell	Self	12/22/2019	D	Why does the Draft FS/ISEIS suggest that APC may need to purchase additional easement upstream of Logan Martin dam when the surcharge level is proposed to be 3.5 feet lower? Downstream I can understand, but not upstream. The document itself implies that there will be very little impact as a result of the increased winter level or the decrease in surcharge. I understand from APC that the easement information has been supplied, so any reference to easements should be updated where appropriate.	The flood operations plan for Lo specifies that the top of the flood easements only up to elevation to maintain currently authorized easements around the lake up t modified flood operations plan, dam to accommodate increased acquisition around the lake. As acquired downstream of Logan plan is the preferred option, and
P-142	Isabella Trussell	Self	12/22/2019	E	In the Executive Summary, page xxiv, lines 34-37, the topic of the paragraph is Logan Martin, yet numbers for Weiss Dam in the last sentence are thrown in, with a reference to "the dam". Which dam is referenced here? Naming the specific dam would clear up any confusion by those of us who are not overly familiar with the cfs reference and could not infer that Logan Martin is the dam in question. Remember that not all of us reading this are conversant in the details of the plan.	The reference to "Weiss Dam" i Dam" has been inserted to repla changed from 572 ft to 473.5 ft.
P-142	Isabella Trussell	Self	12/22/2019	F	There are some out-of-date USGS tables, notably Tables 3-1 and 3-2, which show surface water uses of GA and AL respectively. The most recent data referenced is from 2010, yet I am aware of at least one municipal PWS in the Coosa basin that has come online since then. Are there others? The data will be 11 years out-of-date by the time the Logan Martin update is finalized in 2021. Surely USACE could find more up-to-date information on surface water uses, as well all the groundwater uses presented in the equally out-of-date Tables 3-3 and 3-4. My understanding from the meeting in Childersburg is that the USGS does these studies every 5 years. USGS should have the info from 2015 by now. Since there were variations in uses between the 2005 studies and the 2010 studies, more recent data would more accurately reflect the current conditions and whether or not more recent studies would reflect the trends seen between 2005 and 2010.	USGS, in close coordination with every fifth year (2000, 2005, 20) lead for publishing the Alabama assessments of water use that a provide an important and consist The preparers of this Draft FR/S water use reports since early 20 the ACT River Basin. The 2015 FR/SEIS. The Georgia 2015 was water use report was released of 2015 data and to present more reports indicate that the water u 2005 and 2010, despite an incre- water conservation and efficience

biss Lake, the guide curve (or target elevation for the pool at any point during November 1 and rises back to 561 ft on March 1. During these 4 months, when weather is suitable for boating for fishing or pleasure. A higher winter uld facilitate use of the lake for these purposes, providing greater surface night otherwise not be accessible. USACE understands, and agrees, that suitable for swimming or water skiing during this period.

/ APC for hydropower generation. However, pursuant to the Coosa River to authorized to provide for flood risk management and flow support for roject also provides for substantial water-based recreation as well as other / purposes, despite the reduced pool levels in the winter months to provide

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft).

S acknowledges and documents the aesthetic, recreational, and economic posed increase in winter pool levels.

on in the maximum surcharge level at Logan Martin Lake from elevation 477

ogan Martin Dam and Lake, as defined in the current WCM for the project, of pool at the project is 477 ft. However, APC has purchased flowage 1473.5 ft. One of the available options at the Logan Martin project would be d flood operations and require that APC purchase additional flowage to elevation 477 ft. The other option is to consider the APC-proposed which would include the purchase of flowage easements downstream of the d releases during floods with no requirement for additional easement ssuming that sufficient downstream flowage easement interests have been Martin Dam, USACE agrees that the proposed modified flood operations d this finding is reflected in the RP presented in the Final FR/SEIS.

in the specific paragraph cited in the comment is incorrect. "Logan Martin ace "Weiss Dam" and the maximum surcharge elevation in the sentence

ith state water resources agencies, publishes reports on state water use for 010, and so forth). The Alabama Office of Water Resources assumed the a water use reports in 2005. These periodic reports provide the only applies a consistent approach over time and across states. These reports stent resource for the ACT River Basin, which crosses state boundaries. SEIS have been waiting for publication of the 2015 Georgia and Alabama 019 to update the 2005 and 2010 data and further define water use trends in 5 reports were delayed and not available in time for publication of the Draft vater use report was released on October 8, 2019, and the Alabama 2015 on December 17,2019. The Final FR/SEIS has been updated to include the information on water use trends compared to 2005 and 2010 data. These use in population in both states. The declines are primarily attributable to the generative states.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-142	Isabella Trussell	Self	12/22/2019	G	In Section 3.1.1.5.4, page 3-9 there is a discussion of specific interbasin transfers, but no in depth discussion in this section or in any other about the cumulative effects of these transfers over time on the downstream portions of the Coosa Basin, not to water quantity, not to water quality, and not to future development or to the effect on navigation in the Alabama River. A major oversight, I think, especially considering the climate change implications in Section 7. Surely it is possible to include any cumulative effects at least on water quantity from the time the first transfers were made, not solely the effects of the TSP vs. the current conditions.	Refer to Appendix E, Section E, interbasin transfers. Large-scal water supply needs for Metro At basins are not occurring nor and Basin do occur where the servic For example, the CCMWA servi and Chattahoochee River basin withdraws water for its service a water and wastewater systems transfer of water from the ACT F As stated in Section 3.1.1.5.4 of Metropolitan North Georgia Wat to the ACT River Basin as a res to water use in Cobb County. T Alabama/Georgia state line. Ap interbasin transfers in the ACT I about 14 mgd in 2006, indicatin values are most likely similar to
P-142	Isabella Trussell	Self	12/22/2019	Η	In Table 4-5 there is mention of construction of new reservoirs, with the idea carried forward, but carried forward to what or where? There seems to be only two mentions of new reservoirs. If constructed, will the new reservoirs take part in interbasin transfers? Mention was made of Appendix B at the Childersburg meeting as explaining the reservoirs, but it would be less confusing if there was a reference to Appendix B at this point in the draft EIS.	The purpose of evaluating altern documentation that it is less exp another source. This analysis is were provided by the State of G CCMWA and the city of Carters FR/SEIS. The Final FR/SEIS m of Appendix B that addresses w
P-142	Isabella Trussell	Self	12/22/2019	I	Section 5.6.2, page 5-46, lines 42-43 mention that "just" 10 of the 12 federally protected mussel species occur in the Coosa and Etowah main stem of the rivers and associated reservoirs. "Just" is misleading when speaking of 83% of the federally protected mussel species that occur in these areas. Such language minimizes the importance of these protected species. There is a similar use of "just" of the protected snail species on the following page, at lines 2-3: "just 5 of the 7 federally protected snail species in these same waters" that is 71%. See also page 5-46, line 38 for the use of "just" in relation to the federally protected fish.	USACE concurs with your comr you have recommended.
P-142	Isabella Trussell	Self	12/22/2019	J	Section 5.7.7.1(NAA) as referenced by 5.7.7.2 (TSP) Environmental Justice: There is no mention of APC in NAA, only USACE. There is a similar incomplete explanation in Section 5.7.8.1 (NAA) as referenced by 5.7.8.2 (TSP) Protection of Children, though I noted that there is mention of APC involvement in Section 3.1.7.12, page 3-36, lines 6-7: Shouldn't that information be included in 5.7.8.1? It is very difficult to tell when APC information should be included in the document and when not.	USACE concurs with your comr to consider environmental justic Logan Martin lakes.
P-142	Isabella Trussell	Self	12/22/2019	к	Final Water Control Manual for Logan Martin: Section 4-08 Water Quality, page 4-7, lines 25-26. This sentence is incomplete "Data collected by ADEM since 2000 is also consistent with historical water quality data where pollutant concentrations in Logan Martin Lake."	The sentence was replaced with historical water quality data with
P-142	Isabella Trussell	Self	12/22/2019	L	There are numerous instances throughout both the draft EIS and the WCM for Logan Martin that reference Weiss when it appears that Logan Martin should be referenced. For example, in the final WCM for Logan Martin, Section 8-09, page 8-4, 1st and 3rd paragraphs, some of this info is identical (as in "copy and paste") to the final WCM for Weiss, but where is the drought contingency info for Logan Martin? Use of the "Search" function by someone with a thorough knowledge of both reservoirs could correct this type of problem.	Thank you. The text has been o

3.15.1.2 for more details on the cumulative effects associated with the transfers from the ACT River Basin (including Allatoona Lake) to meet that a communities located exclusively in the Chattahoochee (or other) river tricipated. Some limited net transfers of water to and from the ACT River ce areas for certain water supply providers straddle river basin boundaries. *rice* area (principally Cobb County, GA) covers portions of the Etowah River ns. Allatoona Lake lies partially in northeast Cobb County. CCWMA area from both Allatoona Lake and Chattahoochee River. Cobb County are interconnected across the county. Their operations result in a small net River Basin to the Chattahoochee River.

of the Final FR/SEIS, the 2017 Water Resources Management Plan for the ater Planning District estimated a net loss of about 9 mgd (equal to 16.7 cfs) sult of interbasin transfer. This net loss, based on 2013 data, is mostly due This loss has a negligible effect on Coosa River flows at the ppendix E, Section E.1.1.6.5 (page E-52) has additional information on River Basin. Interbasin transfers in the Georgia portion of the basin were ng a slight decline between 2006 and 2013. Current interbasin transfer o 2013 values.

native sources of water supply is to determine the financial cost and provide pensive to reallocate storage from a federal reservoir than to develop s required under ER 1105-2-100. The alternative sources of water supply Georgia. A more robust consideration of water supply alternatives for sville, GA, including new reservoirs, is provided in Appendix B of the Final nain report has been amended to specifically refer the reader to the portion water supply alternatives.

ment and has revised the sentences of concern to you in Section 5.6.2 as

ment and has revised the text of Sections 5.7.7, 5.7.7.1, 5.7.8, and 5.7.8.1 ce and protection of children in relation to the proposed actions at Weiss and

h the following: "Data collected by ADEM since 2000 is also consistent with n regard to pollutant concentrations in Logan Martin Lake."

corrected in Section 8-09.
Commenter ID	Commenter	Representing	Comment Date	Comment	Comment		
P-142	Isabella Trussell	Self	12/22/2019	Μ	 Here are some of the other places in the Logan Martin WCM where it appears that "Logan Martin" or info for Logan Martin should be used in place of "Weiss" or Weiss info: Section 5-01, p. 5-1, lines 7-8: Since this document is the WCM for Logan Martin, should the "flood risk management operations of the Weiss Project" actually be "Logan Martin Project"? Section 5-01a, p 5-1, lines 20-22 refer to reporting gages above Weiss dam and references Plate 5-1. There are reporting gages above Logan Martin dam as seen in Plate 5-1, even though Nate 5-1 shows the Neely Henry drainage area, rather than Logan Martin's drainage area. (There is a note at Plate 5-1 that states the need to depict the Logan Martin Basin.) Section 5-06, p 5-6, lines 20-21: Perhaps USACE has no water resource info for Logan Martin, but APC definitely has info on Logan Martin Lake. See lines 23-24 for reference to Weiss. Section 5.08, page 5-7, lines 7-10: It appears that the sentence should begin "For emergencies involving the Logan Martin Project." Section 7-02, page 7-4, line 15: Though true about Weiss, it seems "Logan Martin" should be substituted as the situation —flow releases—is the same. Section 7-12, page 7-9, line 35: Again, it seems that "Weiss" is used when "Logan Martin" should be used in the sentence. Section 8-05, page 8-3, lines 26-29: It is puzzling that crappie fishing in Weiss is mentioned at all in reference to the Fish and Wildlife in the Logan Martin WCM. Perhaps something about Logan Martin would be more appropriate. Section 9-01 a. USACE, and b. Other Federal Agencies and d. Alabama Power Company, page 9-1: These subsections may contain appropriate uses of "Weiss", but it is difficult for the general public to know whether or not this is true. It appears "Logan Martin" should replace "Weiss" in these two places: Section 9-01 d, page 9-1, line 40, and Section 9-02, page 9-2, line 16 	Thank you. The text has been o	
P-142	Isabella Trussell	Self	12/22/2019	N	As previously stated, I am all for the additional two feet in the winter at Logan Martin—the big picture- but I am not convinced that the WCM should have been titled "Final". There are missing diagrams (though noted in the WCM), out of date information, missing or incomplete information, etc. I think it imperative that USACE review this document and the draft EIS to make them as accurate and up-to-date as possible. I do appreciate the time constraints involved, but to put out the WCM for Logan Martin as a final version doesn't do justice to the hours of work put in by USACE personnel.	USACE concurs with your communication were inadvertently designated a received from agencies and the documents presented in the Firm	
P-143	Mike Bearden	Self	12/9/2019	A	Submitted Exhibit No. 1. NOTE: Exhibit 1 was a copy of a December 8, 2019 letter from the Board of the Lake Allatoona Association (Comment ID # NGO-03). Detailed comments in that letter are addressed under NGO-03.	Detailed responses to comment provided under NGO-03.	
P-144	Thomas Cook	Self	12/9/2019	A	So I guess my opinion is concerning (<i>Weiss</i>) Lake is that it's a good thing to raise the level 3 feet in the winter time, and that's because the commerce would increase and also the safety of the lake would improve.	The RP includes raising the wir acknowledges and documents increase in winter pool levels.	
P-145	Matt Hester	Self	12/9/2019	A	By raising the winter pool (<i>at Weiss Lake</i>) to 561, what effect does that have to the number of times the lake gets above 568 and the duration of those events? Thanks.	According to modeling output, V for 12 events under the RP ove event is 568.05 ft (January 1940 —107 for the NAA and 102 for the	
P-145a	Matt Hester	Self	2/16/2020	A	I am writing you with my concern and disapproval of raising Weiss Lake's the winter pool level from 558ft. to 561ft We are currently 2/16/2020 at 566Ft. which will cause most shoreline property owners another clean up and the second year in a row with an out of bank flood. Please note that our docks can not handle the annual beating they are taking as a result of any time the level exceeds 565. By raising the level by 3 feet, it will happen with even more frequency. My address is (<i>redacted</i>).	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. HEC-ResSim outp the time for both the NAA and F (for the RP).	
P-145a	Matt Hester	Self	2/16/2020	В	Also, can you please tell me why there were no public hearings regarding the issue held in Centre, Cedar Bluff or Leesburg? How does that happen?	USACE appreciates your attend Mobile District decided to hold of following the release of the Dra Childersburg, AL. Public scopir with excellent public participation driving distance for anyone who	
P-145a	Matt Hester	Self	2/16/2020	С	Please confirm receipt, and I really would appreciate any answers you can provide. We love our Lake and feel that this plan is a bad one.	Thank you for your comments. the proposed plan, as indicated	

corrected in each of the sections as described.

ment. At the Draft FR/SEIS stage of the process, the WCMs in Appendix A as "Final". USACE has made substantial revisions based on comments e public, as well as further internal USACE review, to ensure that the WCM nal FR/SEIS are correct.

ts raised in the Lake Allatoona Association letter of December 8, 2019 are

nter pool at Weiss Lake to elevation 561 ft. Section 5.0 of the Final FR/SEIS the economic and recreational benefits associated with the proposed

Weiss Lake would exceed elevation 568 ft for 11 events under the NAA and er the modeled period of record. The peak elevation for the one additional 6). There is a slight reduction of days above elevation 568 ft; (5 fewer days the RP). The total number days in the simulation is 26,659 days (73 years).

hter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for puts show that elevation 565 ft would be experienced less than 1 percent of RP; the 1 percent exceeded elevations are 564.63 ft (for NAA) and 564.72 ft

dance at the public meeting on December 9, 2019 in Acworth, GA. USACE open-house public meetings at four locations in the ACT River Basin aft FR/SEIS for this study: Acworth, GA; Rome, GA; Gadsden, AL; and ng meetings were held at the beginning of the study in these same locations on. All four meeting locations were determined to be within a reasonable o might have a major interest in the study.

USACE has considered the concerns expressed by you and others about d in the Final FR/SEIS.

Commenter	Commenter	Boproconting	Comment	Comment	Comment	
P-146	Billy Pruitt	Self	12/10/2019	A	I wasn't trying to be critical. I wanted to thank the Alabama Power for the program they did a few years ago for looking at the levels coming into Weiss Lake and trying to design a system so that they can start letting the water off early. I like to be positive. You know, that's a good thing. And I commented to Alabama Power and I told them I've been living on the lake. I went to the groundbreaking. It was a big thing and all that kind of stuff. Some of you people too, I know, because it had to be okay. But it's been a big thing and I'm 82 and I don't want to complain. I want to look at what we did and see in the past what we didn't do right and make it right. That's why I'm here, you know. Anyway, I kind of represent people of my age Me and my wife are 82 and in our area our houses are solid and we are the young kids. The neighbor next door is 92. So put this down in your notes. I think it would be better if they had come and seen and talk to you guys. We all could have helped. We have Gadsden State College and a room as big as this. And I don't know who decided I don't know who decided where to have the meetings at, and I know they are trying to centrally locate it. Folks coming from Mobile ought to do this. You need more corporation from the local people. You know, like the Chamber and the Commission and all that. That's the thing I see to improve. I would have one just for the older folks. You know, the way to solve a problem is you don't cover it up, you just start talking about it.	USACE appreciates your attend Mobile District decided to hold o following the release of the Draf Childersburg, AL. Public scopin with excellent public participation driving distance for anyone who
P-146	Billy Pruitt	Self	12/10/2019	В	I give you my good and bad. That's all I see. I came over here to get information and talk to people. It's been very informational. What I'm trying to do is give what little knowledge that I've gained over the years and sharing it. But if nobody wants it, that's fine too. I don't have any problem either way.	Thank you for the positive feedb meeting. USACE values your p
P-147	Catherine Pecher	Self	12/30/2019	A	I live at and would like to support the decision to raise and keep the water level up (<i>at Logan Martin Lake</i>). It is a beautiful Lake and when the water drops to winter levels it is not very pretty. Also it is dangerous to be on the water when the levels drop so low. It is difficult to navigate. Also think it is not good for the wildlife.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-148	Steve Edsall	Self	12/30/2019	A	 I would like to register my support for the proposed raising of the winter water level on Logan Martin Lake to elevation 462 as noted in the recent report. My reasons: I am currently a weekender but will become full time in 3 years when I retire. This increased winter low would allow me access to the lake year round This would make the lake visually more appealing and valuable to those viewing and using the lake Allows for better maintenance/control of water levels by Alabama Power Co Better protects the lake wildlife habitat 	The RP includes raising the win of the Final FR/SEIS acknowled environmental benefits associat
P-148	Steve Edsall	Self	12/30/2019	В	I recommend implementation of the new winter water levels (<i>at Logan Martin Lake</i>) as soon as possible. If this is to be delayed, I would recommend a consideration of seasonal variances be granted until such time as the measure is enacted.	A decision on the RP is expecte been made, a seasonal variance granted. However, variances w operations.
P-149	W. D. (Skip) Benton	Self	12/30/2019	A	 I wish to notify you I support the decision to raise the winter water level on Logan Martin Lake to elevation 462 as noted in the report. This decision: allows for better protection of the lake environment in drought conditions. protects the lake wildlife habitat. allows for better maintenance/control of water levels by Alabama Power Co. improves and/or extends the usage of the lake for business and pleasure purposes. aesthetically makes the lake more attractive and valuable to those living in the area. 	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-149	W. D. (Skip) Benton	Self	12/30/2019	В	I recommend it (<i>increased winter pool levels at Logan Martin Lake</i>) be enacted at the earliest possible date. If one must wait til Jan 2021 then allow a yearly variance until enacted to begin the process as soon as possible.	A decision on the RP is expecte been made, a yearly variance to granted. However, variances w operations.
P-149a	W. D. (Skip) Benton	Self	12/30/2019	A	 I wish to notify you I support the decision to raise the winter water level on Logan Martin Lake to elevation 462 as noted in the recent report. This decision: allows for better protection of the lake environment in drought conditions protects the lake wildlife habitat allows for better maintenance/control of water levels by Alabama Power Co improves and/or extends the usage of the lake for business and pleasure purposes aesthetically makes the lake more attractive and valuable to those using, living, or viewing the lake 	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in

dance at the public meeting on December 10, 2019 in Rome, GA. USACE open-house public meetings at four locations in the ACT River Basin ft FR/SEIS for this study: Acworth, GA; Rome, GA; Gadsden, AL; and ng meetings were held at the beginning of the study in these same locations on. All four meeting locations were considered to be within a reasonable of might have a major interest in the study.

back on the value of the information we shared at the Rome, GA public participation and input.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the aesthetic, recreational, and environmental benefits increase in winter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic, recreational, aesthetic, and ted with the proposed increase in winter pool levels.

ed by March 2021. Until the ACR Study is complete and a final decision has ce to raise the winter pool to elevation 462 ft at Logan Martin Lake will not be vill be evaluated on a case by case basis during flood and drought

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational, aesthetic, and environmental benefits increase in winter pool levels.

ed by March 2021. Until the ACR Study is complete and a final decision has o raise the winter pool to elevation 462 ft at Logan Martin Lake will not be vill be evaluated on a case-by-case basis during flood and drought

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational, aesthetic, and environmental benefits increase in winter pool levels.

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-149a	W. D. (Skip) Benton	Self	12/30/2019	В	I recommend enacting the new winter water levels at the earliest possible date. Should waiting be necessary, I would suggest a consideration of seasonal variances be granted to move forward with the important decision.	A decision on the RP is expecte made, a seasonal variance to ra granted. However, variances w operations.
P-150	Scott O'Neal	Self	12/31/2019	A	I live on the shore of the lake (<i>Logan Martin</i>) and am very very excited about the possibility of a higher winter pool. My friends and I fish the lake about 3/4 of the year; only because of the really low water. Im not going to destroy a boat. But anyways my wife and I are in support for the raise in the winter pool. I believe it will bring more people and more money to our towns. Thank you for your time.	The RP includes raising the win of the Final FR/SEIS acknowled the proposed increase in winter
P-151	Clay Wilson	Self	12/24/2019	A	I thank you for the opportunity to let you know my thoughts. I support the increase in the winter pool water level for our lake 100% (<i>Logan Martin</i>). During the winter months there are many days that we could take a cruise and enjoy our beautiful lake only if we had more water in the lake! I also feel it would be a boost to our local economy by increasing the number of people that visit our area to enjoy the lake. This would help our hotels, restaurants and marinas. In closing, I personally see nothing but good coming from this increase in our lake level. Thanks for listening and Merry Christmas!	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-152	Charles Rice	Self	1/7/2020	A	Please add 3 feet to Weiss Lake's winter pool level. It will mean that my pier will be in water the year round.	The RP includes raising the win the Final FR/SEIS acknowledge increase in the winter pool level
P-153	Gary Nuyt	Self	1/14/2020	A	I have lived on Logan Martin Lake for 2 years at (address redacted), Talladega, AL. I have experienced one flood situation in Feb 2019. My primary concern pertains to mitigating impacts to personal property during severe weather conditions. Even though I support adjustment to winter lake levels, I am not opposed to keeping the lake level at 460 ft during the Nov thru April time frame in order to provide for additional surge capacity. Further, I fully support pulling lake levels down during any part of the year to prevent flooding.	The RP includes raising the win performed in conjunction with th including the revised winter guid Logan Martin Lake. The scope operation as submitted by APC. this study.
P-153	Gary Nuyt	Self	1/14/2020	В	I do have concerns on how the proposed water management (lake level control) will be handled during real time events. All parties involved will need to be proactive and understand the new operating process to be sure adequate surge capacity exists when our next extreme weather condition occurs.	Section 8-01 of the Weiss and L in operating the projects. Sever understand the proposed opera
P-154	Gary Wheeler	Self	1/20/2020	A	As the one responsible for the safety of my elderly parents and their home on Lake Weiss in Cherokee County Alabama, I am very concerned with the proposal to raise the winter level of the lake by three feet. It has not even been 5 years since the last severe winter flood on the lake that damaged over 150 homes as well as roads and bridges in the area. My elderly parents have mobility difficulties and should another flood occur or an even worse flood occur, they might find themselves unable to escape and could find their health and even their lives in jeopardy, should another more severe flood occur.	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake.
P-154	Gary Wheeler	Self	1/20/2020	В	With the damages incurred in December 2015, I wonder if the Corps of Engineers and/or Alabama Power have done any studies to determine the extent of additional damages if the water had started 3 feet higher. The flood in 2015 was approximately 4 feet above full pool. an additional 3 feet at winter pool would seem to be a significant increase, if not the full 3 feet, to the flood level potentially bringing that level to almost 7 feet above full pool. Many of the 150 homes flooded in 2015 were completely destroyed. With the level up close to another 3 feet, how many more homes would have been destroyed?	The RP includes raising the win performed in conjunction with th including the revised winter guid Weiss Lake. Increasing the win elevation during flood operation
P-154	Gary Wheeler	Self	1/20/2020	С	What are the benefits sought of raising the winter level and are they commensurate with the damages that could be sustained in another flood of the same proportions as 2015? Please reconsider the decision to raise the winter level of the lake and consider the devastation this could bring to the lives of the residents of the lake.	APC inclusion of higher winter le extended recreation opportunitie raising the winter level to impac are considered in the final selec storms—some with magnitudes
P-155	Richard Dean	Self	1/19/2020	A	I am concerned about the inability of Ala Power Co to control the river level upstream from Gadsden during heavy rain events (Neely Henry Lake). I live on Cove Lake about 5 river miles upstream from the bridges at Gadsden. During heavy rain events often times my pier (which is 30 in above summer pool) is underwater while piers at Southside and Rainbow City have only mud under them.	USACE understands your conce levels. Flood operation includes downstream river elevation. Th peak elevation from what would
P-155	Richard Dean	Self	1/19/2020	В	There appears to be a natural dam somewhere downstream from Gadsden possibly at Minnesota Bend. Can anything be done to help this situation? I am not as concerned about water over my pier from time to time as I am about serious flooding at my place while the river downstream from Gadsden is at low levels.	USACE understands your conce any issues related to flow constr effort.
P-156	Charles Lawrence	Self	12/12/2020	A	I would like the winter level raised on Logan Martin to 462 and improve recreational use. And recreational use to me is fishing, grandkids being pulled around. So that kind of it's like also, it will improve the fishery for sure. And it would make more stable during the spring spawns and stuff, bringing it up because spring spawn comes early here in Alabama. It pretty well starts in late February. And they don't bring the lake up until after February. Pulled up to 462 I truly believe it would be helpful.	The RP includes raising the win of the Final FR/SEIS acknowled with the proposed increase in w

ed by March 2021. Until the ACR Study is complete and a final decision is aise the winter pool to elevation 462 ft at Logan Martin Lake will not be *v*ill be evaluated on a case-by-case basis during flood and drought

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic and recreational benefits associated with r pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the aesthetic, recreational, and economic benefits crease in winter pool levels.

nter pool level at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of es and documents the recreational benefits associated with the proposed ls.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for of the USACE effort was limited to evaluating the Coosa River modified . No variations to APC's modified flood operations proposal are included in

Logan Martin WCMs describes the coordination between USACE and APC ral meetings have occurred between the agencies to discuss and mutually ation plan. If adopted, the agencies would work together to implement it.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for nter level by 3 ft does not translate to a 3-ft increase in the peak reservoir

levels in the modified operation is in response to a stakeholder request for es and improved aesthetics. There is no attempt to equate the benefits of cts of reducing flood storage. However, the impacts on numerous resources ction. The modeling effort included the evaluation of several historic is greater than the 2015 flood event.

ern. However, APC does not have the power to completely control river s reducing reservoir releases from Weiss Dam to assist in lowering the ne flood operation of the APC reservoirs is to lower the downstream river d occur naturally.

erns about the river downstream from Gadsden, AL. However, evaluating traint in the vicinity of Minnesota Bend is not within the scope of this study

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and environmental benefits associated *v*inter pool levels.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-156	Charles Lawrence	Self	12/12/2020	В	The other side effect of the 462 would improve property values on folks in sloughs that run out of water during the winter. There's a five foot difference between summer level and winter level. That's pretty well all I've got. It would benefit our place. We'd all have permanent water.	The RP includes raising the wir of the Final FR/SEIS acknowled increase in winter pool levels.
P-157	David Freeman	Self	1/23/2020	В	As a resident of Rainbow City, I have observed the very low evacuation levels below "Minnesota Bend" while there was flooding in Gadsden. We object to any changes that would make these events worse or more frequent.	USACE understands your conc any issues related to flow const effort. The proposed actions in that area worse or more freque
P-158	Margaret Wheeler	Self	1/23/2020	A	My husband & I are responsible for the health & safety of my father-in-law and my mother-in-law who have a house on the shore of Lake Weiss. They are both in their 80s now & have mobility issues & severe health issues. Considering the recent flood on Lake Weiss in 2015, which caused damage to many homes & blocked roadways into & out of the lake area, we are very concerned about this proposal to increase the winter water level. Should another flood like that occur while the lake is kept at a 3-foot increase in the winter, my in-laws would be completely unable to leave their neighborhood & receive medical help, should they need it. Also emergency medical services would be unable to reach them, if the need arises.	The RP includes raising the wir performed in conjunction with the including the revised winter guid Weiss Lake (572 ft). Increasing reservoir elevation during flood
P-158	Margaret Wheeler	Self	1/23/2020	В	I understand that some industries have requested this increase in the water level, but I sincerely hope that the Corps of Engineers will also take into account the needs of the individuals who live at the lake. I don't think it is an overstatement to say that lives could depend on this decision. We are very concerned for the welfare of our loved ones. And we hope you will also take that into consideration when you make this very important decision.	APC specifically requested a 3- partially based upon requests fr and subsequently to USACE in conducted for the study indicate remain within the current APC f
P-170	Roben Duncan	Self	1/26/2020	A	I would like to see the winter pool (<i>at Logan Martin Lake</i>) change by 2 feet. The benefits would be enormous for our communities. The City of Lincoln is in the process of building a extraordinary park designed for anglers Pro and everyday, boardwalk, piers, launch, pavilions, swim area, staging, and many other amenities. The rise will help with tournaments and the city of Lincoln's growth. As a person who lives on Logan Martin it will make my view even more enjoyable.	The RP includes raising the wir 5.0 of the Final FR/SEIS acknow with the proposed increase in th
P-170	Roben Duncan	Self	1/26/2020	В	One Question will there be a week(s) that it will decrease for pier repair?	If the proposal to raise the winter could still conduct periodic temp other facilities around the lake, for the APC Coosa River reserve
P-172	Julie Hennessey	Self	1/26/2020	A	I am requesting that you raise it (<i>Logan Martin</i>) even sooner. Look at historic temperatures and raise it on 4/1. We don't need more than 2 months to fix areas of the dock etc, it's overkill and no one wants it down this long. I am building a home on the lake and I hate the fact that my view is going to change so much for no good reason. A shorter period of time makes way more sense. Please consider having it down for a shorter period of time.	USACE addressed the specific operations at Logan Martin Dar level at the Logan Martin projec Suggested guide curve revision Study.
P-173	Ryan Castleberry	Self	1/26/2020	A	The changes to the water levels on Logan Martin would help the community as a whole. I believe it would increase revenue for Pell City and the surrounding areas. Promote a healthy fishery and increase property values.	The RP includes raising the wir 5.0 of the Final FR/SEIS acknow with the proposed increase in the
P-176	Wayne Bucher	Self	1/26/2020	A	I have just today become aware of the proposed changes to the rules for managing the level of this lake (<i>Logan Martin</i>). We own waterfront property on this lake ([redacted], Vincent) and would benefit from this change, if I understand it correctly. I think most water-front owners will appreciate this, with reduced peak flood levels, increased winter level and increased days at summer level.	The RP includes raising the wir 5.0 of the Final FR/SEIS ackno proposed increase in the winter
P-176	Wayne Bucher	Self	1/26/2020	В	Why wasn't there more public awareness made of this? Shorelines Magazine?	APC has been requesting for sea at the Logan Martin project. US extensive mailouts and public s and released for public review i blasts, published legal notices i public and receive input on the
P-176	Wayne Bucher	Self	1/26/2020	С	BTW, my frustrations with the lake are the excess of geese and their toxic pollution, and boating hazards from residual debris (remnants of irrigation suction pipe) that is exposed at ~459.5'.	Management actions on the Log beyond the scope of this ACR \$
P-176	Wayne Bucher	Self	1/26/2020	D	I also would like to have a more efficient way to alert owners in advance of the level likely going into flood levels as I may consider keeping a boat in the boat house with lift (and roof), rather than having to pull it out during the winter. Presently I don't have enough water under my dock to use the boat during the winter, and I'm concerned about high level pushing the boat through the roof before I can get there to move the boat.	USACE understands your conc to use National Weather Service

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the economic benefits associated with the proposed

traint in the vicinity of Minnesota Bend is not within the scope of this study the ACR Study would not be expected to make the reported conditions in nt.

nter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling ne ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for g the winter level by 3 ft does not translate to a 3-ft increase in the peak operation.

-ft increase in the winter pool level at Weiss Lake. That request was at least rom adjacent landowners and recreational interests as expressed to APC the public meetings for the ACR Study. Again, the flood modeling es that pool elevations during future flood events would be expected to flowage easements for Weiss Lake (572 ft).

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational and aesthetic benefits associated he winter pool level.

er pool level at Logan Martin Lake from 460 ft to 462 ft is approved, APC porary drawdowns below elevation 462 ft to facilitate repairs to docks and conducted in accordance with the specific provisions of the FERC license voirs.

guide curve changes requested by the APC in their request to modify flood n. APC requested USACE concurrence with raising the winter guide curve to based upon substantial input from adjacent landowners and users. In other than those requested by APC are outside the scope of this ACR

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational and fishery benefits associated ne winter pool level.

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational benefits associated with the r pool level.

everal years that USACE consider the proposed changes to flood operations SACE Mobile District requested scoping input on the proposed changes via scoping meetings in August 2019. When the Draft FR/SEIS was completed in November 2019, USACE Mobile District again sent newsletters and email in local newspapers, and held another round of public meetings to inform the proposal.

gan Martin project to address the problems identified in the comment are Study and would be within the operational purview of APC, not USACE.

ern and recommends that you contact APC directly. We do urge all citizens e alerts as a safety precaution.

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-177	David Seahorn	Self	1/26/2020	A	I am a year round resident on Logan Martin. Please approve to raise the winter level and shortened time span. We dread each year the drastic drop in water levels. We can't enjoy the beauty of the lake in fall because of having to pull boats out so early. We don't understand why above the dam, Gadsden levels will be almost over their banks and simultaneously ours are drastically reduced. We fully support to increase the winter level and decrease the time this must be experienced on Logan Martin Lake.	The RP includes raising the win 5.0 of the Final FR/SEIS acknow proposed increase in the winter
P-178	Harry Knowles	Self	1/26/2020	A	We live on Lake Logan Martin I so agree on raising the winter level on Lake Logan Martin. We would be able to get boats in and out of the lake, and have a nicer view. One of the more important reasons I approve this plan it would hopefully stop the people that come down our dead in road to fish in the winter time. They keep any fish they catch or throw them on the bank. The also pollute the lake by leaving their trash and fishing line. The ducks and geese get caught in this line and cannot swim. All this besides being annoying one of these people actually ran over our dog and killed him.	The RP includes raising the win 5.0 of the Final FR/SEIS acknow with the proposed increase in th beyond the scope of the ACR S
P-179	Drew Alexander	Self	1/26/2020	A	I am all for this change, being that I live on this lake (<i>Logan Martin</i>), and have zero water at my pier during the winter level of 460. However, I also love fishing this lake also, and do not want to harm that aspect. I am assuming it has been considered what effect if any this would have on the spring Crappie spawn. Regarding the sudden drop from 462 to 460 in the event of expecting floods.	The RP includes raising the win 5.0 of the Final FR/SEIS acknow fishery associated with the prop
P-181	Bryton Nixon	Self	1/26/2020	A	I was directed to this email to comment on the proposal for the new winter pool level for Logan Martin. I have lived on this lake for 27 years. I can confidently say I use this lake more than anyone else between recreational summer boat rides and fishing from dam to dam year around. I would like to say that I for one do not have a problem with the winter level, as is. It is second nature to me and I know how to navigate safely around it. That being said with the bass fishing world exploding into the high school and college ranks, it is of some concern to me that we are jeopardizing the safety of young anglers with the hazards that are present on this impoundment. As I'm sure you are aware there are tournaments that have 300 or more boats in them during the winter and early spring months. Most of the hidden hazards would be taken out of the equation with the new water level implemented. Currently just below stemley bridge there are old bridge pylons that are 1ft below the surface that are not marked and propose a great danger to those whom are not familiar with this hazard or the many more that are imposing the same risk all around the lake.	The RP includes raising the win 5.0 of the Final FR/SEIS acknow proposed increase in the winter
P-181	Bryton Nixon	Self	1/26/2020	В	Aside from boater safety a great advantage of the new winter level is the impact that it will have on the aquatic ecosystem. Each year when the fish are spawning in the spring it never fails that the timing is that of when they start filling up the lake. What happens is the fish make their bed by digging in the dirt with their tail and then lay their eggs in that bed. When the water levels fluctuate the ones that had already laid out their eggs in most cases lose them and this of which had not have to start the process all over again which stresses the fish out and really beats them up. The conditions need to be stable during this time of year to improve the success rate of the spawning fish. Fluctuating water during spawn is why the fishing is better on lakes left at full pool year around vs flood control lakes.	The RP includes raising the win 5.0 of the Final FR/SEIS acknow the proposed increase in the win
P-182	Tom Terry	Self	1/26/2020	A	I favor the proposal to change the winter pool level (<i>at Logan Martin Lake</i>) to 462' provided that it is accomplished without increasing the flood risk. I live on the lake in Lincoln.	The RP includes raising the win performed in conjunction with the including the revised winter guid Logan Martin Lake (elevation 47
P-186	Thomas Wagner	Self	1/26/2020	A	As a landowner along the banks of Logan Martin Lake I wish to notify you I support the decision to raise the winter water level on Logan Martin Lake to elevation 462 as noted in the recent report. This decision: - allows for better protection of the lake environment in drought conditions - protects the lake wildlife habitat - allows for better maintenance/control of water levels by Alabama Power Co - improves and/or extends the usage of the lake for business and pleasure purposes - aesthetically makes the lake more attractive and valuable to those using, living, or viewing the lake	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-186	Thomas Wagner	Self	1/26/2020	В	I recommend enacting the new winter water levels at the earliest possible date. Should waiting be necessary, I would suggest a consideration of seasonal variances be granted to move forward with the important decision.	A decision on the RP is expected been made, a seasonal variance granted. However, variances we operations.
P-188	William & Virginia Holland	Self	1/26/2020	A	We fully support changing the Weiss Lake winter water levels as proposed by the Corps of Engineers. We believe this change will enhance recreation and fishing opportunities on the lake. Based on presentations by Corps of Engineer personnel, we do not believe this change will impact water quality or the overall health of the lake. We look forward to this change being implemented.	The RP includes raising the win the Final FR/SEIS acknowledge increase in the winter pool level

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational benefits associated with the r pool level.

hter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational and aesthetic benefits associated he winter pool level. The other concerns discussed in the comment are Study.

hter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the benefits to recreation and to the reservoir bosed increase in the winter pool level.

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the recreational benefits associated with the r pool level.

nter pool level at Logan Martin Lake to elevation 462 ft (from 460 ft). Section wledges and documents the benefits to the reservoir fishery associated with inter pool level.

hter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Modeling he ACR Study has shown that the APC-proposed modified flood operations, de curve, would remain within the current APC flowage easements for .73.5 ft).

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational, aesthetic, and environmental benefits increase in winter pool levels.

ed by March 2021. Until the ACR Study is complete and a final decision has ce to raise the winter pool to elevation 462 ft at Logan Martin Lake will not be vill be evaluated on a case-by-case basis during flood and drought

nter pool level at Weiss Lake to elevation 561 ft (from 558 ft). Section 5.0 of es and documents the recreational benefits associated with the proposed

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-189	Benny Thackerson	Self	1/26/2020	A	Will changing the Alabama Power flood elevation (at Logan Martin Lake) change the flood elevation for FEMA?	Reducing the top of the Logan M zones around the lake. Any det only ways to change the FEMA According to the Alabama Office updated FEMA flood maps were FEMA would fund another study
P-189	Benny Thackerson	Self	1/26/2020	В	I am for raising the winter pool elevation and allow for lowering at some interval for pier repair/construction.	If the proposal to raise the winter could still conduct periodic temp other facilities around the lake, of for the APC Coosa River reserve
P-190	John Haynes	Self	1/26/2020	A	As a fifty-plus year resident of property on Logan Martin Lake I feel that the winter pool level change to 462 ft. would be a good change if and only if great care is taken to prevent flooding when possible. Past flood on the lake where the water level has exceeded the former Alabama power easement levels (473.5) has caused great expense and even danger to property owners adjacent to the lake. The 473.5-foot level has been used as the baseline for building on the lake for most of the time that the lake has been in existence. Moving the flood level to 477ft has caused a great increase in insurance for structures built using the old easement levels.	The RP includes raising the wind analysis has demonstrated that higher winter pool level (462 ft), current flowage easements arou easements acquired by APC. In peak reservoir elevation during the
P-192	Bill Shoemaker	Self	1/26/2020	A	The plan appears ok if the summer lake levels (<i>at Logan Martin Lake</i>) are not reduced. It would be nice to have a period in the winter where the lake level would be at a lower level to allow for doc repair prior to remaining at the increased 2 ft level.	The summer guide curve elevation Logan Martin Lake from 460 ft to below elevation 462 ft to facilitate accordance with the specific pro-
P-197	Joanna McCabe	Self	1/27/2020	A	I would like to support a higher lake level at Logan Martin. With the great weather here it would be an excellent time to enjoy (<i>not legible</i>) on the Lake year round. This would encourage more waterfront restaurants and a lot of needed resources for the community.	The RP includes raising the wind of the Final FR/SEIS acknowled increase in winter pool levels.
P-198	Anita Bucher	Self	1/27/2020	A	My husband and I own a house on Logan Martin and are in support of raising the winter pool level as well as gaining a few extra weeks of full pool in the summer and fall. Thanks for giving us the opportunity to speak into this decision and for all you do to service and maintain Logan Martin.	The RP includes raising the wind of the Final FR/SEIS acknowled increase in winter pool levels.
P-204	Jimmy Stewart	Self	1/27/2020	A	Just wanted to email and let you know I am in favor of raising the (<i>winter</i>) level to 462 (<i>at Logan Martin Lake</i>). I would think property values on the lake would go up, more homes would sale, and for more money during the winter months. We sold our house on the lake a few years ago and my agent would not list house until May because she wanted lake water level to be up when we listed it. The house we then purchased was discounted by \$100,000.00 when we bought it, due to the water going down and they knew it would be harder to sale in the winter months. I see a lot homes reduce listing price when the water levels go down. I also think that business in pell city would do better, a lot of the weekenders that I know do not come up at all during winter months due to the water dropping 5 feet in the winter.	The RP includes raising the wind of the Final FR/SEIS acknowled the proposed increase in winter as you have suggested.
P-205	Lyon Wright	Self	1/27/2020	A	as a land owner in the upper Coosa River region (Choccolocco Creek), I am HIGHLY opposed to raising the (<i>Logan Martin</i>) lake levelmany times the damage done by this practice far out weighs the benefit. If the people can't launch their boats due to the water level, build a BETTER OR LONGER boat ramp.	The RP includes raising the wind analysis has demonstrated that higher winter pool level (462 ft), current flowage easements arou easements acquired by APC. In peak reservoir elevation during the
P-206	Josh Vincent	Self	1/27/2020	A	I'm sending this as both the Director of the City of Lincoln Water Rescue Team and as a private citizen that lives on the Logan Martin Lake. The Logan Martin is a tricky lake for those that aren't familiar with the under water lay out. Between sand bars and under water hazards a boater can get into trouble rather quickly. Therefore when the lake levels are dropped each year our lake becomes even more dangerous and basically closes down for recreational boaters myself included. I personally have a 21 foot ski boat that has a deep draft. Once the water level starts going down I'm forced to winterize my boat until the following May. So basically I'm only able to enjoy our beautiful lake 4 or 5 months out of the year. And that's just not fair when our neighbors to the north on the Neely Henry have year round full pool. The same applies for the City of Lincolns primary rescue boat. We operate a 19 foot center console as our primary response/patrol vessel. Once the water level is down to full pool it is winterized as well leaving us without a patrol vessel and leaving us with a small flat bottom response vessel which greatly hinders our proactive water rescue program.	The RP includes raising the wint the Final FR/SEIS acknowledge increase in winter pool levels. A Director of the City of Lincoln W Logan Martin Lake would likely i
P-206	Josh Vincent	Self	1/27/2020	В	Lastly, seasonal water greatly effects our land values as well as dampers our economic growth our city as well as every other city along the Logan Martin could see.	The RP includes raising the wint of the Final FR/SEIS acknowled increase in winter pool levels. In benefit the economies of commu-
P-214	Dale Herring	Self	1/27/2020	A	I am for this move. It would be great for Pell City and the surrounding communities. It would be great for the recreational activities on the lake (<i>Logan Martin</i>).	The RP includes raising the wind of the Final FR/SEIS acknowled increase in winter pool levels.

Martin Lake flood pool should not negatively impact the current FEMA flood termination of changes to flood zone maps would be made by FEMA. The flood elevation on Weiss Lake is by a FEMA-funded study or FEMA LOMR. e of Water Resources, the Middle Coosa watershed RiskMAP project and e completed in 2016. Therefore, it would likely be several years before y in the Middle Coosa River watershed.

er pool level at Logan Martin Lake from 460 ft to 462 ft is approved, APC porary drawdowns below elevation 462 ft to facilitate repairs to docks and conducted in accordance with the specific provisions of the FERC license voirs.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Technical the APC-proposed modified flood operations at Logan Martin Dam, with the could be conducted so flood events would be expected not to exceed the und the lake (elevation 473.5 ft) and remain within the downstream flowage ncreasing the winter level by 2 ft does not translate to a 2-ft increase in the flood operation.

tion would remain the same. If the proposal to raise the winter pool level at to 462 ft is approved, APC could still conduct periodic temporary drawdowns the repairs to docks and other facilities around the lake, conducted in ovisions of the FERC license for the APC Coosa River reservoirs.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and aesthetic benefits associated with pool levels. These benefits may translate into increased property values

hter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Technical the APC-proposed modified flood operations at Logan Martin Dam, with the could be conducted so flood events would be expected not to exceed the und the lake (elevation 473.5 ft) and remain within the downstream flowage ncreasing the winter level by 2 ft does not translate to a 2-ft increase in the flood operation.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5 of es and documents the recreational benefits associated with the proposed As you have indicated in your comment, based on your experience as /ater Rescue Team and a private boat owner, higher winter pool levels on improve conditions for boating safety and your local water rescue program.

ter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed mproved conditions for recreational use during those months would likely unities around the lake.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

Commenter ID	Commenter	Representing	Comment Date	Comment ID	Comment	
P-220	Amie & Jamison Marsh	Self	1/27/2020	A	We are in favor of increasing the winter pool level (<i>Logan Martin Lake</i>). We live at the lake all year round but are unable to use our boat launch during the winter months. By allowing the level to increase, we will not only be able to enjoy fishing longer, but will also have an increase in property value by having winter time water. Thank you for your consideration!!!	The RP includes raising the wind of the Final FR/SEIS acknowled increase in winter pool levels.
P-223	Tammy & Ronnie Maddox	Self	1/27/2020	A	We are year-round residents of Logan Martin Lake in Cropwell, AL and would like to comment on the proposal for water levels before the Wednesday deadline. We wish you all would consider not dropping water level until December and raise water level back in March to summer pool. That would give residents time to work on piers during the winter months and allow residents to enjoy our lake through the fall, spring, and summer months. The proposal does not really help the full-time residents on the Cropwell side. We would like to be able to enjoy our lake for more months than the current 5 months out of 12 months and would appreciate your reconsideration of adjusting water levels. I would be glad to send pictures of what our view looks like during the time span that we are not at summer pool levels, if needed.	USACE addressed the specific g operations at Logan Martin Dam level at the Logan Martin project Suggested guide curve revisions Study. If the proposal to raise th APC could still conduct periodic and other facilities around the la license for the APC Coosa Rive
P-224	Robert Morrison	Self	1/27/2020	A	The proposed increase in the summer pool level for Allatoona from 840 feet MSL to 841 feet MSL, in my opinion, will provide absolutely no benefit to Allatoona or its lakeside homeowners. This increase in elevation and associated wave action will destroy most of the existing 270 mile Allatoona shoreline by as much as 2 feet, or almost three million linear feet of soil and vegetation. Although this action may provide economic and other benefits to various parties down river in Alabama, I personally cannot see any benefit to persons in Georgia. especially those who are homeowners bordering USACE land on Allatoona.	USACE concurs that additional expected to have more than slig
P-224	Robert Morrison	Self	1/27/2020	В	Even at the 840 feet MSL elevation, I still have waves, almost exclusively generated by watercraft wakes, that will splash up to and sometimes over my seawall. In addition. I also have a wooden pier to which my dock gangway is attached, that is level with the seawall, and with an increase to the 841 feet MSL, it will constantly be wet and slippery from wave action. An increase in the Allatoona summer pool elevation to 841 feet MSL will not only inconvenience me and my immediate neighbors, as well as others, it will cause permanent damage to unprotected areas adjacent to my current seawall, will make my current seawall non-conforming to USACE requirements, i.e., 2 feet above a new summer level, and possibly lessen the value of my property. I believe that all my immediate neighbors in this small cove area will be more or less similarly impacted.	USACE has permitted seawalls elevation should be 2 ft above s ft summer pool will impact comp indeed a recreation managemen purview.
P-224	Robert Morrison	Self	1/27/2020	С	There are two compromises for mitigation that I propose be considered that would be compatible with increasing the summer pool to 841 feet MSL, as follows: Compromise One: (i) Replace my existing pier and raise my seawall to not less than 843 feet MSL. and (ii) hard armor the unprotected lake front area between my existing seawall and my neighbor's seawall at 130 Myrtle Road, ither by extending my current seawall, or using some other method to stabilize that area. Compromise Two: Construct a floating wave harrier, similar to those now protecting commercial docks, e.g., Victoria Marina and Harbor Town Marina, that will lessen and minimize the effects of destructive wave action. Such a wave barrier I estimate would be between 250 and 300 feet, and would shelter 5 docks with a sixteen boat docking capacity.	USACE response pending.
P-224	Robert Morrison	Self	1/27/2020	D	I have been an active boater on Allatoona starting as a pre-teen since the early 1950s. when most boats were small wooden craft of 14 to 16 feet lengths and outboard motors of 25 to maybe 40 horsepower. A big boat would be a small cabin cruiser less than 30 feet. or maybe a Chris-Craft inboard runabout, and there was very little boat traffic. Fishing boats were small, with small HP motors. Today it's an entirely different world. Boats arc almost all fiberglass, have much more powerful engines, are very much faster, and lots heavier. Currently, there are many boats designed to greatly increase the size of their wakes, i.e., "wake-board" and "surf-board- boats, with absolutely no size, speed, displacement or other limits imposed by anyone. Allatoona is now, like it or not, at times way overcrowded and increasingly less enjoyable, and less safe, because of its popularity and no limitation provisions on the watercraft using the Lake.	Comment noted.
P-225	Caroll Watson	Self	1/27/2020	А	I live on the lake (Logan Martin) and totally support the proposal to raise the winter water levels and other changes.	The RP includes raising the win
P-225	Caroll Watson	Self	1/27/2020	В	My environmental friends tell me that it will also reduce the CO2 level as the decaying vegetation gives off the gas. So less decaying vegetation.	Less vegetative decay is possib vegetation exposed due to the a markedly reduce CO2 levels.
P-228	John Ray	Self	1/28/2020	A	Thanks for taking the time to have my voice heard on the matter of Logan Martin. I have lived on this lake for over 10 years. During this time I get to use the lake very little in the winter time. Two feet of water would mean I would have year around access to use the lake. That would be "GREAT".	The RP includes raising the wind of the Final FR/SEIS acknowled increase in winter pool levels.

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

c guide curve changes requested by the APC in their request to modify flood m. APC requested USACE concurrence with raising the winter guide curve ct (to 462 ft) based on substantial input from adjacent landowners and users. ns other than those requested by APC are outside the scope of this ACR the winter pool level at Logan Martin Lake from 460 ft to 462 ft is approved, c temporary drawdowns below elevation 462 ft to facilitate repairs to docks lake, conducted in accordance with the specific provisions of the FERC er reservoirs.

erosion is likely, however, this minor change to the summer pool level is not ght localized effects on shoreline erosion and vegetation.

s and shoreline stabilization measures with the explicit direction that the top summer pool and the bottom elevation 2 ft below. Wave action from an 841pleted shoreline stabilization projects. While boat sizes and speeds are ent concern on the lake, boat wake impacts are generally outside of USACE

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft).

ble, as the RP will result in reducing the amount of submerged aquatic annual draw down. It would, however, be speculative to say this would

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational benefits associated with the proposed

Commenter			Comment	Comment		
ID	Commenter	Representing	Date	ID	Comment	
P-228	John Ray	Self	1/28/2020	В	I understand the need for flood control. I'm a Certified Floodplain Manger so I do know a little about the process and the importance of having a plan in place. With Logan Martin being a storage lake for winter time floods we have to have a solid plan in place. With the lakes upstream and downstream that never fluctuates (there are 4 lake in this category) the goal can be achieved by lowering these 4 lakes (before a predicted rainfall) by 1' to 1 ½' and raise them over full pool by 1' to 1 ½' that would give you between 8' to 12' of variation to work the water and to keep the downstream flow slower. I have always understood the flow was regulated because of the need not to have to much freshwater going into the Mobile Bay. I have one deck post that is in flood plain. By lowing the Flood Elevation this would save me \$900.00 a year. Thanks for give me your time to hear my thoughts on this very important matter.	Logan Martin and Weiss dams 436. APC was granted the righ include operation for flood contr winter, which results in lower re during the wetter parts of the ye elevation from what would occu effectiveness would be lower ar water is temporarily stored in th easements within the reservoir remaining dams (reservoirs) on as run-of-river (outflow equals in events.
P-230	Jason Kauffman	Self	1/28/2020	A	We are in support of the lake level changes raising the winter pool up 2 feet (<i>at Logan Martin Lake</i>), as this will provide an economic and visible boon to both Talladega and St. Clair Counties, both of which are economically depressed areas in need of this financial infusion that only you can provide.	The RP includes raising the wir of the Final FR/SEIS acknowled the proposed increase in winter
P-234	Clif Wakefield	Self	1/28/2020	A	My name is Clif Wakefield and I live in the Lands End Subdivision just south of the I-20 bridge (<i>at Logan Martin Lake</i>). I have been working with Alabama Fist Habitat about installing a habitat in the cove that backs up to my property but the only problem I was having was the winter pool level. I just could not connect the dots so to speak because of the existing level. I heard that you were considering to raise the winter level two foot and if so this would help tremendously. I'm all for this change if all possible.	Thank you for your comment. Lake from 460 ft to 462 ft. This addressed in your comment.
P-249	Glen Long	Self	1/28/2020	A	I am not in favor of raising the summer pool elevation @ Lake Allatoona. The primary purpose of Lake Allatoona is flood control & there is no benefit to storage by raising. It would also have negative benefits to recreation. Many people & marinas have docks permanently tied to shore that would have to be moved. After 65+ years @ 840 full pool shoreline erosion has taken place and in many places a small shelf would be underwater for people & animals to step off thinking they are wading in inches of water causing leg & foot injury.	USACE response pending.
P-249	Glen Long	Self	1/28/2020	В	Water allocation could be increased easily by keeping the water level closer to 840 until Sept 5 per Appendix A Plate 3-1 Top of Summer Elevation. The historical median average data line on Water Control Regulation Guide Curve leaves 840 on July 4 & follows Zone 2 line down & is about 5 feet low @ Sept 5 In other words follow Appendix A Plate 7-1 Top of Conservation Line @ 840 with water line.	The amount of basin inflow to the requirements might prevent US the late summer and early fall.
P-249	Glen Long	Self	1/28/2020	С	Raising the lake will also kill a lot of existing shoreline trees & vegetation causing future floating hazards for boaters. Per Newton's 3rd Law of Physics - For every action there is an equal & opposite reaction: there will be other detrimental effects that no one has thought of before they happen.	USACE concurs that there will I concurs that there might be som over time. Additionally, boaters should not have an impact unle
P-254	Cathy Harris	Self	1/28/2020	A	I support changes to the lake level (at Logan Martin Lake)!! Please give us this much needed extra water in the lake. I have heard from many fishermen that many times the water does not come up in time for their crappie fishing in the spring. I don't personally fish but the higher water level would make the lake much more accessible year round and increase property values.	Thank you for your comment. T ft. This change would likely imp your comment.
P-266	Wayne Snow	Self	1/28/2020	A	This is in regards to the proposed plan to increase the winter pool water level of Logan Martin Lake. My wife and I have been on Logan Martin since 2001. And while it is a beautiful lake it is only accessible some 5 -6 months of the year due to the current winter level. I feel a raised water level would not only bring more visitors year round but possibly more permanent residents which would benefit communities surrounding Logan Martin. At the same time a raised, more consistent water level should help increase property values of existing properties. These financial benefits would not only help the communities on the lake but the counties they are in and in the long run the state of Alabama. In addition to being a plus for the residents and communities of Logan Martin it would seem more water in the lake year round would also benefit wildlife in the area such as fish, fowl and deer. While all are in abundance, improving their surroundings and habitat should add to their numbers and help make the lake even more attractive. I strongly urge the Army Corps of Engineers to proceed with these proposed plans to raise the winter water levels and enhance a beautiful lake.	The RP includes raising the win of the Final FR/SEIS acknowled associated with the proposed in
P-344	Hawk Branch Horses	Self	1/29/2020	A	Highly in favor of level of winter pool being increased. Would be of great value to residents and recreational users.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-351	Charles McDowell	Self	1/29/2020	A	I have a place on Logan Martin lake and the extra 2 feet in elevation would allow me to use my boat dock all year. Also the city park would be much improved. Year around water adds economic value to the community. The power company has the ability to respond to rain to control flooding. Therefore the downside should be minimal. I request that it be raised as much as possible. It is a mystery to me why it cannot go higher.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.
P-357	Cliff White	Self	1/29/2020	A	I support the proposed change in winter water level (at Logan Martin Lake) I'm sure this will have a positive effect on fishing and boating in the area.	The RP includes raising the win of the Final FR/SEIS acknowled increase in winter pool levels.

operate for flood control as a requirement of the Coosa Power Act (P.L. 83nt to develop the upper Coosa River for hydropower with the requirement to rol and navigation. The season change in the guide curve from summer to servoir elevations in the winter, provides additional storage for flood waters ear. The flood operations of the reservoirs lower the downstream river peak ar naturally. If the reservoir were not lowered in the winter, their nd potentially not in compliance with the Act. During the flood operation, he flood storage causing the reservoirs to rise. APC has purchased flowage with the intent to store water to the limits of these easements. The the Coosa River have no flood control storage; therefore, they are operated inflow) reservoirs with small fluctuations in elevation except during extreme

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational and economic benefits associated with r pool levels.

The RP includes raising the winter guide curve elevation at Logan Martin s change should improve conditions for the proposed fish habitat protect

he project in any given year combined with multi-purpose project operational ACE from maintaining the Allatoona Lake pool level at the guide curve in

be an initial impact on existing shoreline trees and vegetation. USACE also me initial impacts with floating hazards; however, those issues will lessen a should be operating at idle speed within 100 ft of the shoreline, so trees as they are actually floating in the water.

The RP includes raising the winter guide curve elevation from 460 ft to 462 prove conditions for spawning and for recreational fishing as indicated in

nter pool at Logan Martin Lake to elevation 462 ft (from 460 ft). Section 5.0 dges and documents the recreational, aesthetic, and environmental benefits increase in winter pool levels.

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P-509	Michael (no last name provided)	Self	2/16/2020	A	Winter lake Level (Weiss). Don't raise the level. Look at the last two years.	The RP includes raising the wint performed in conjunction with the including the revised winter guid Weiss Lake (elevation 572 ft). In peak reservoir elevation during f
P-510	Sarita Workman	Self	2/11/2020	A	I'm writing this email in concern for lake Weiss. Why can you not let the lake down to where it needs to go in the fall so that when we have lot of rain people's place don't flood? Just make sense that this would help things.	See response to P-509, Comme
P-512	Chad Holder	Self	2/12/2020	A	As a property owner on lake Weiss my biggest concern is with flood issues. I was under the impression that the purpose of winter levels as a water shed was to compensate for flooding. Having gone through last year's record setting flood and seeing the devastation from when the water level was still near winter levels is a concern. If the level would have been a couple of feet higher which is what it sounds like it would be under the new proposal. We would be seeing flood levels above the easement of 9 foot. This would be a disaster for all of Lake Weiss property owners and not to mention the economy of all the towns and businesses that depends on Weiss for their livelihood and tax revenue. I don't claim to be an expert on this issue by any means and I know the people making these decisions are a lot smarter than me in this area. However, I do feel that the winter draw down has been working to lessen the chance of major floods for the most part for many years. I admit it would be nice to have the higher winter water levels for fishing and being able to utilize the lake more, but I feel it is not worth the risk at hand. Thank you for your consideration.	See response to P-509, Comme

inter pool at Weiss Lake to elevation 561 ft (from 558 ft). Modeling the ACR Study has shown that the APC-proposed modified flood operations, lide curve, would remain within the current APC flowage easements for Increasing the winter level by 3 ft does not translate to a 3-ft increase in the g flood operation.

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Table F-2. ACR Draft FR/SEIS commenters who supported a winter guide curve raise at Logan Martin Lake without citing specific benefits or reasons for their support.

P-01	Mike Cruce	P-91	Lee Robinson	P-202	Dan Duke
P-02	Zach Crosen	P-92	Mark Mize	P-203	Jamey Vella
P-02a	Zach Crosen	P-97	Paul and Phyllis Biddy	P-208	Dean Sanders
P-07	Joy Redmon	P-102	Melodie Crawford	P-209	Sammy Lee
P-11	Linda Ruethemann	P-104	Bill Harness	P-210	Mark Harmon
P-33	Chris Kelly	P-105	Linda Harness	P-211	Chad Jones
P-34	Sam Elliott	P-107	Ed & Terry Pruet	P-212	Carey Daniel
P-36	Donald Urso	P-111	Majorie Tanner	P-215	Chad Allinder
P-37	Rebecca Berryhill	P-112	Greg Chappell	P-222	Fayne Howle
P-38	W. Dunn	P-114	Rick Hollingsworth	P-231	Ben Bludsworth
P-39	Trey Smitherman	P-115	Chuck Baader	P-232	Gary Steed
P-42	John Gilreath	P-116a	Doug Adamson	P-233	George Massey
P-44	Dennis McMurry	P-120	Cecil Gregory	P-235	Joey Callahan
P-45	Kimberlee Russell	P-127	Nora Stokes	P-238	Delane Griffin
P-47	Jen Helvie	P-129	Al Craig	P-242	Billy Pe
P-48	John Sporleder	P-133	Scott Smith	P-243	Mike Horton
P-48a	John Sporleder	P-134	Bud Kitchin	P-244	William Cotney
P-49	Roger Gooch	P-138	Susan Wilson	P-247	Deanna Griffin
P-50	Danny Childs	P-141	Fred and Ruth Clay	P-250	Jamie Hopper
P-53	Pam Wells	P-166	Stacy Dunaway	P-251	Danielle Elrod
P-54	John Luker	P-167	Chris MeGahee	P-252	Danielle
P-55	Julia Cobb	P-168	Maynard Searing	P-253	Sheila Smith
P-56	Jason & Tammy Osga	P-169	Edward Higgins	P-255	Lauren Holladay
P-57	Lee Ann Grimmett	P-171	Sheri Crump	P-256	Sharon Price
P-59	Liz Elliott	P-174	Glenda Gilliland	P-257	Joey Reynolds
P-61	Tracy Isbell	P-175	Michael Richey	P-258	Wendi Feazell
P-62	Tony Isbell	P-180	Brittney Emerson	P-259	Lawn Care
P-63	Beth Wilson	P-183	Sam Wester	P-260	Debbie Snow
P-64	Davey Jones	P-184	Janice Wester	P-261	Karen Keech
P-67	Chris Shelnutt	P-187	Charles Parker	P-262	Tina Godfrey
P-70	Wayne Hutson	P-189a	Benny Thackerson	P-263	Betty Banks
P-71	Marc & Norine Wilson	P-191	Chuck Hicks	P-264	Tina Potter
P-72	Calvin Howard	P-193	Carol Breckle	P-265	Tina Nelson
P-78	Glenda Hutson	P-194	Sally Vinson	P-267	M. Johnston
P-82	Johnny Capps	P-195	Nila McBrier	P-268	Katie Baldwin
P-83	Brent Skipper	P-196	Cathy MeGahee	P-269	Randy Greene
P-86	Laura Clark	P-199	Rachal Jones	P-270	Dale Baker
P-87	James Sanford	P-200	Carl & Marsha Wallace	P-271	Jennie Leigh
P-88	Terrence Rumore	P-201	rpcmc	P-272	Donna Haynes

P-273	Josie Retan	P-320	Glenda Whitley	P-354	Allan & Misty Thompson
P-274	Celeni Sasser	P-322	Dave Williams	P-355	Byron Dorough
P-289	Tina Griffin	P-323	Mary Howard	P-358	Patsy O'Rourke
P-291	Timothy Bowman	P-324	Bill Atchley	P-359	Brian Bass
P-292	Dick Lindsey	P-328	Jim Wall	P-360	Joe O'Brien
P-293	Scott Norton	P-329	Justin Cooper	P-362	Mark Abbott
P-294	Pamela Childs	P-330	Cathy Limbaugh	P-363	Jimmy Wilkins
P-295	Jason King	P-331	Vicki Smith	P-367	Keith Bentley
P-296	Mike Brush	P-332	Rena Miller	P-368	Brittany Mordecai
P-299	frada12345	P-333	Trace Adams	P-378	Margie Sims
P-300	Thomas Swift	P-334	Amber Scharf	P-379	Rebecca Giles
P-301	Whitney Champion	P-335	Wendy Gohde	P-380	Keith Legg
P-302	Pierce Garrison	P-336	L. Heath	P-383	Sadie Britt
P-303	Chad Woodruff	P-338	Allan Gohde	P-384	Michael Hilton
P-304	Lisa Heathcock	P-339	Sondra Heath	P-400	Steve Sims
P-305	Jordan Heath	P-340	Shellie Sapp	P-401	Eric Housh
P-306	Debbie Atchley	P-341	Phillip Goodwin	P-428	Carl W. Ponder
P-307	Nick Gohde	P-342	Wai Ng	P-435	Joe Crosby
P-308	Mary and Joe Lee	P-343	Robyn Bass	P-436	Peggy Cruce
P-309	Rodney Talley	P-345	Sam Smith	P-437	Tamela Edwards
P-313	Susan Watson	P-346	Nathan Holman	P-442	Sharon Flannagan
P-314	Elana Weems	P-347	Les Bradford	P-490	Scott Chandler
P-315	Nancy Green	P-348	Chris Jones	P-492	Patricia Blum
P-316	Randall Heathcock	P-350	Bruce Wilson	P-508	Joe Svetlay
P-317	Darcy Wolff	P-352	Jerry Bodenhamer		
P-319	Sylvia Tanner	P-353	Luke Dorough		

Table F-3. ACR Draft FR/SEIS commenters who submitted the standard comment statement prepared by the Neely Henry Lake Association.

P-155a	Richard Dean	P-285	Ed Lett	P-393	Blair Goodgame
P-157	David Freeman	P-286	Rose Jernigan	P-394	James Brown
P-159	Gene Dean	P-287	Brad Phillips	P-395	Tina Watford
P-160	Jerry Howell	P-288	Mason Caldwell	P-396	Leon Watford
P-161	Tommy Chandler	P-290	John Smith	P-397	Ferris Ritchey
P-162	Gary Burt	P-297	Jason Weaver	P-398	Sydney Gunter
P-163	Nancy Burt	P-298	Michele Atkins	P-399	Randy Gunter
P-164	David Tumlin	P-310	Dennis Snider	P-402	Christina O'Sullivan
P-165	Bruce Cornutt	P-311	Ralph Campbell	P-403	Cody Kuechle
P-185	Nick & Karon Vezertzis	P-312	Thomas Deale	P-404	Ritchie Patterson
P-207	Larry Davis	P-318	Karen Walizer	P-405	Melissa Williams
P-213	Ryburn Clay	P-321	Royce Cox	P-406	Israel Britt
P-216	Michael Roberts	P-325	Harold Weaver	P-407	Justin Elliot
P-217	Danny Dunlap	P-326	Mark Weaver	P-408	Drake Bellamy
P-218	Kay Moore	P-327	Krista Weaver	P-409	Derick Dodson
P-219	David Duckworth	P-349	Vicky Wilson	P-410	Clay Autrey
P-221	Ragan & Bev Godfrey	P-356	Paula Ross	P-411	Jenny Whaley
P-226	Drew Southers	P-361	Wes Ellis	P-412	Nancy Gardner
P-227	David Nichols	P-364	Teresa Deweese	P-413	Nolan Pentecost
P-229	Frank Ballard	P-365	Ricky Deweese	P-414	Pat Reeves
P-236	Scott Seawright	P-366	David Burgess	P-415	Jamie Douer
P-237	John Hatley	P-369	Jason Wills	P-416	Mary Lumpkin
P-239	Phillip Walker	P-370	Brittany Kleinatland	P-417	Larry Kuechle
P-240	Wayne Smith	P-371	Lashawn Walker	P-418	Andrew Works
P-241	Ronald Seawright	P-372	Brenda Whitt	P-419	John Snyder
P-245	Kelly Whisenant	P-373	Michael McClellan	P-420	Brett Davis
P-246	Dennis & Patricia	P-374	Kip Williams	P-421	Jonathan Shadwrick
P-248	Henderson led Morrow	P-375	Eddie Wills	P-422	Daniel O'Sullivan
P-275		P-376	Christy Wills	P-423	Katie Grell
P-276	Recky Armstrong	P-377	Patricia Hutchens	P-424	James Keeling
P-277	John Trale	P-381	Kevin Riggan	P-425	Kenneth Harris
P-278	Dana Heath	P-382	Mack Buel	P-426	Angela Britt
P-270	Penny Penrod	P-385	Suzanne Stephens	P-430	Tim Ramsey
P-280	David Whisenant	P-386	Rick & Joyce Merkel	P-431	Paul Blankenship
n-281	Michelle Garbe	P-387	Christi Mayo	P-432	Barbara Stoddard
p-201	John Doise	P-388	Lorenzo Head	P-433	Daniel Dodson
P-283	Mary Doise	P-389	James & Melissa Holmes	P-434	Ana Juan
D_284	Daniel Whisenant	P-390	George Harbin	P-438	Tammy Brown
1 -204		P-391	Rene Baker	P-439	Amy Kelly

P-440	Jeff Brown	P-482	Tiffany Privett
P-443	Terry Vosbury	P-483	Wesley Heath
P-444	Francis Langdon	P-484	David Eubanks
P-445	Donald Freriks	P-485	Rodney Armstrong
P-446	Robert Mize	P-486	Chuck Knox
P-447	Clarence Bryant	P-487	Rusty Hamilton
P-448	Bretton Yokem	P-488	Sheryl Stephens
P-449	Lori & Chris Dunaway	P-491	Randy Elrod
P-450	Vaugh & Rebecca	P-493	Kenneth Swafford
	Traywick	P-494	Trudy Hall
P-401	Babby Wilson	P-495	Allen Frazier
P-402	Nornan Lambart	P-496	Becky Morgan
F-400		P-497	Brittany & David Jester
P-404		P-498	Debbie Robinson
P-400	Charles Freehour	P-499	Gerry Bagley
P-400		P-500	Heather, Anthony,
P-407	Nessie & Dill Nessiniun		Rebecca, & Michael Burgess
P 450		P-501	Jane Frazier
P 460	Linda Abol	P-502	Joe Morgan
P 461	Nathan Clough	P-503	Kim Nguyen
P 462	Sharan Lott	P-504	Michael Bagley
P-402	Bickey Armstrong	P-505	Patty Isdell
P-460	Ropald Patrick	P-506	Paul & Lenell Johnson
D 465		P-507	Robert Isdell
P-400	Sherry Woodall		
P-467			
D /69	Carria Caldwell		
P 460	Pamona Clomonts		
P-409	Ramona Clements Ir		
D_171	Larry Whisepant		
D_/70	Damela Barron		
F-4/2	Tim Parron		
P-4/3	nim Barron		

- P-474 Deborah Thomas
- P-475 Rick O'Neal
- P-476 Karen Lockridge
- P-477 Saleta McBrayer
- P-478 Renee Works
- P-479 Ken Caldwell
- P-480 Conner Crowe
- P-481 Kathy Horton

F.3 ACR Study – Correspondence with Agencies

F.3.1 Cultural Resources

Initial notification to 26 federally recognized American Indian tribes of the ACR Study and the opportunity to participate in public scoping meetings is discussed in Section 2.3 of the Scoping Report (Attachment 1). Copies of the September 15, 2018 notification letters are included in Appendix B of the Scoping Report. Comments received from the tribes on the Draft FR/SEIS are addressed Section F.2.2 above.

Copies of correspondence with the Georgia and Alabama State Historic Preservation Officers (SHPOs) to establish Programmatic Agreements to address potential impacts to cultural resources are presented in Attachment 4.

F.3.2 Endangered Species Consultation

USACE submitted a Biological Assessment (BA) for the Tentatively Selected Plan (Alternative 11) on November 25, 2019. After multiple discussions with USFWS staff members, USACE submitted a revised BA on May 11, 2020. By letter dated November 06, 2020, the USFWS concurred with the USACE determination that Alternative 11 (now identified as the Recommended Plan) may affect, but would not be likely to adversely affect, federally listed endangered or threatened species and would not be likely to adversely modify or destroy designated critical habitat for these species within the region of influence of the proposed project in the ACT River Basin. These documents are included in Attachment 5.

F.3.3 Other Agency Correspondence

Relevant USACE correspondence and coordination with other pertinent agencies is included in Attachment 6.

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Attachment 1. Scoping Report

Final Public Scoping Report

Integrated Study and Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin

September 2018



PREPARED FOR

U.S. Army Corps of Engineers, Mobile District Post Office Box 2288 Mobile, AL 36628-0001

PREPARED BY

Tetra Tech, Inc. 1899 Powers Ferry Rd SE, Suite 400 Atlanta, GA 30339

EXECUTIVE SUMMARY

The U.S. Army Corps of Engineers (USACE), Mobile District conducted interagency and public scoping meetings in July and August 2018 to initiate preparation of a combined Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Control Manuals. For brevity, this effort will be referred to as the Allatoona-Coosa Reallocation (ACR) Study or ACR Study. The project delivery team had two primary purposes for conducting the scoping meetings: (1) to inform agencies and the public about the project scope; schedule; project planning, National Environmental Policy Act, and reservoir water management processes; and (2) to seek input on key concerns and issues as well as relevant sources of data and information related to the project that USACE should consider during the project planning process, alternatives analysis, and Supplemental Environmental Impact Statement (SEIS) preparation.

USACE shared information with attendees about the State of Georgia's water supply request related to the Allatoona Lake Water Supply Storage Reallocation Study as well as the Alabama Power Company (APC) request for revised operations at the Weiss and Logan Martin Reservoir projects and any associated Water Control Manual updates. Information was presented in an open house format that allowed attendees to interact with and ask question of USACE technical experts. Six stations were set up at each meeting with poster displays, fact sheets, maps and other items to disseminate information to the attendees. Attendees were invited to provide their input in writing using comment forms or by dictating it to an on-site court reporter. Any attendees who did not submit their comments at the meeting were encouraged to submit them in emails or letters to USACE during the public scoping comment period. USACE also sought public input by canvassing attendees using interactive posters/charts at selected stations in the meeting room.

Cumulatively, there were 407 attendees at the five public meetings. Attendees included a limited number of representatives from local U.S. congressional offices, state and local agencies, elected officials, APC, and local news media. The largest share of meeting attendees were members of organizations representing lake users and landowners at Allatoona, Weiss, and Logan Martin lakes, environmental interests, and business interests (primarily recreation and tourism); and members of the public.

USACE organized and categorized the comments by issue area and are summarized in this scoping report. This scoping report, organized by five sections, provides background on USACE's role in managing the Alabama-Coosa-Tallapoosa River Basin and the purpose and need for the ACR Study (Section 1); describes the scoping activities conducted by USACE (Section 2); categorizes the issues raised in the scoping comments (Section 3); summarizes the comments submitted by federal, state, and governmental agencies (Section 4); and provides the framework for preparing an Integrated Study and SEIS to address the potential for significant impacts on the human and natural environment resulting from implementation of the ACR Study (Section 5).

Formal written letters, comment forms, verbal comments (from court reporter transcripts), and emails were summarized into five broad categories, then further subcategorized. Most of the comments received focused on USACE water management practices (24 percent); operations associated with USACE-authorized project purposes (18 percent); and water-based recreational (lake levels), regional economic, and water quality issues/areas of concern (13, 12, and 7 percent, respectively). The last three issues have been combined under the environmental resource considerations category. All other issue areas combined equaled about 25 percent of all comments received. Lake levels, recreation, water quality, water management, and economic resources were also among the most checked category boxes on the comment forms, representing 58 percent of the responses.

Two petitions were also received during the scoping period. A Change.org petition, *Allatoona Lake concerned citizens request a seat at the USACE meeting table*, signed by 726 stakeholders as of September 1, 2018 asks USACE for more transparency. The second petition was a *Call to Action* through Facebook with 85 stakeholders asking to *Add me* to the Facebook *Call to Action*. The Facebook post offered stakeholders several ways to comment and expressed the importance of keeping Allatoona Lake at full pool and ensure clean water.

Throughout this process, the public can obtain information on the status of the study at http://www.sam.usace.army.mil/Missions/Planning-Environmental/Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/.

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ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
ACR Study	Allatoona-Coosa Reallocation Study
ACT	Alabama-Coosa-Tallapoosa
ALOWR	Alabama Office of Water Resources
APC	Alabama Power Company
ARC	Atlanta Regional Commission
CCMWA	Cobb County-Marietta Water Authority
DOJ	U.S. Department of Justice
EA	Environmental Assessment
EIS	Environmental Impact Statement
GAEPD	Georgia Environmental Protection Division
HEC-ResSim	Hydrologic Engineering Center Reservoir Simulation Model
M&I	Municipal and Industrial
NAA	No Action Alternative
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
PDT	Project Delivery Team
SeFPC	Southeastern Federal Power Customers, Inc.
SEIS	Supplemental Environmental Impact Statement
SEPA	Southeastern Power Administration
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WCM	Water Control Manual
WSA 1958	Water Supply Act of 1958

1.0 INTRODUCTION

The U.S. Army Corps of Engineers (USACE), Mobile District conducted interagency and public scoping meetings in July and August 2018 to initiate preparation of a combined Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Control Manuals. For brevity, this effort will be referred to as the Allatoona-Coosa Reallocation (ACR) Study or ACR Study. The water supply study will evaluate a March 30, 2018 request by the State of Georgia for a water supply storage reallocation out of Allatoona Lake. The flood storage analysis will evaluate APC's proposal for revised operations at the Weiss and Logan Martin projects for which USACE has navigation and flood risk management oversight. USACE intends to prepare a Supplemental Environmental Impact Statement (SEIS) for these potential changes to the Water Control Manuals (WCMs) for the three projects and to the overall Master Manual for the ACT River Basin. The SEIS will be prepared as an integrated decision document capturing the analysis of the projects and the environmental impacts associated with the proposed federal action, pursuant to the National Environmental Policy Act (NEPA). This scoping report summarizes the information gathered through August 24, 2018.

1.1 BACKGROUND

The water resources of the ACT River Basin serve several purposes from northwest Georgia downstream through central Alabama and into Mobile Bay, over about 320 miles and encompassing an area of about 22,800 square miles. Eighteen major dams (six USACE projects including the Carters Reregulation Dam and 12 nonfederal projects) are located on the mainstem rivers throughout the ACT River Basin (Figure 1-1).

Under Section 7 of the Flood Control Act of 1944, USACE operates projects in the basin in accordance with water control plans and manuals for their authorized purposes and nonfederal projects that contain navigation and/or flood control (currently referred to as flood risk management). WCMs provide guidance to water managers in operating reservoirs by providing detailed information on how to operate the reservoirs under normal and extreme conditions (flood and drought), including ensuring dam safety during extreme conditions.

In May 2015, USACE completed an update to the Master WCM for the ACT River Basin but deferred WCM updates for the two APC reservoir projects, Weiss and Logan Martin. At that time, USACE determined that additional study of flood risk and necessary flood easements was required before those updates could be completed. A pending request for additional water supply storage and changes to storage accounting practices at Allatoona Lake was also deferred.

In January 2018, the U.S. District Court for the Northern District of Georgia issued a judgment in Georgia et al. v. U.S. Army Corps of Engineers, No. 14-cv-03593 (Jan. 9, 2018). The judgment held that USACE had unreasonably delayed action on Georgia's water supply request and directed USACE to take last action by responding to that request. The State of Georgia submitted an updated request to USACE on March 30, 2018. USACE intends to evaluate actions necessary to respond to Georgia's request, as well as one or more reasonable alternatives, in the integrated study and SEIS.



Figure 1-1. Alabama-Coosa-Tallapoosa River Basin.

1.2 PURPOSE AND NEED

USACE designed the scoping process to inform agencies and the public of the extent of the study and to collect feedback to address the needs of the study. No alternatives have been defined at this point in the study. A series of management measures have been considered based on the following purpose and need.

The purpose of this study is to:

- Evaluate the 2018 water supply request from the State of Georgia to reallocate water storage out of Allatoona Lake
- Evaluate proposed revised operations at two APC projects: the Weiss and Logan Martin projects
- Update any WCMs, as necessary, as a result of changes in operations
- This study is needed to:
- Respond to the State of Georgia's request for water supply, pursuant to the Northern District of Georgia's January 9, 2018, order
- Produce an integrated SEIS addressing water supply storage and flood operations
- Produce updated project WCMs as required by regulation
- Produce an updated Memorandum of Agreement for APC projects

The following sections summarize the process used to collect feedback and the feedback received from agencies and the public to formulate study alternatives.

2.0 SCOPING PROCESS

The project delivery team (PDT) had two primary purposes for conducting the scoping: (1) to inform agencies and the public about the project scope; schedule; project planning, NEPA, and reservoir water management processes; and (2) to seek input on key concerns and issues as well as relevant sources of data and information related to the project that USACE should consider during the project planning process, alternatives analysis, and SEIS preparation. Agencies and the public were informed of this effort through a variety of means, offered opportunities to engage and ask questions of USACE technical experts, and provided with several methods for providing input. USACE will consider public input and additional technical information throughout the development of the study. The feedback collected during the public scoping process will be used to formulate alternatives and evaluate their effectiveness in balancing the USACE project purposes defined for projects in the ACT River Basin.

2.1 NOTICES OF INTENT

A Notice of Intent (NOI) announcing the study was posted on Monday, April 30, 2018 (83 FR 18829, April 30, 2018). The initial NOI provided background on the study, detailing the content in Section 1.1 of this report. USACE announced the time and location of five public scoping meetings through the *Federal Register* in a Supplement to the NOI on Friday, July 13, 2018 (83 FR 32641, July 13, 2018). Appendix A includes both notices.

2.2 PUBLIC NOTICES

In addition to the NOI and the Supplement to the NOI, USACE also distributed newsletters and a press release to notify the public of scoping activities, what scoping is, the locations of the public meetings, and methods for providing comments. Appendix A includes the newsletter and press release. USACE distributed 870 electronic newsletters and 2,050 hard copy newsletters to a mailing list created during a previous effort in the ACT River Basin.

2.3 AMERICAN INDIAN TRIBAL CONSULTATION

USACE sent letters to 26 federally recognized American Indian tribes notifying them of the study and the opportunity to attend the public meetings. Table 2-1 lists the American Tribes that received notification letters. The letters also offered the opportunity to participate in an alternative format upon the request of the tribes. USACE had received a response from one tribe as of September 15, 2018. Therefore, to date, no additional meetings are planned with federally recognized American Indian Tribes. Appendix B provides the correspondence as of September 15, 2018.

Name	State
Absentee-Shawnee Tribe, Oklahoma	Oklahoma
Alabama-Coushatta Tribes of Texas	Texas
Alabama-Quassarte Tribal Town	Oklahoma
Caddo Nation, Oklahoma	Oklahoma
Catawba Indian Nation	South Carolina
Cherokee Nation, Oklahoma	Oklahoma
The Chickasaw Nation	Oklahoma
Chitimacha Tribe, Louisiana	Louisiana
Choctaw Nation of Oklahoma	Oklahoma
Coushatta Tribe of Louisiana	Louisiana
Eastern Band of the Cherokee Nation	North Carolina
Eastern Shawnee Tribe of Oklahoma	Missouri
Jena Band of Choctaw Indians, Louisiana	Louisiana
Kialegee Tribal Town, Oklahoma	Oklahoma
Miccosukee Tribe of Indians of Florida	Florida
Mississippi Band of Choctaw Indians	Mississippi
Muscogee (Creek) Nation	Oklahoma
Poarch Band of Creek Indians	Alabama
Quapaw Tribe of Indians, Oklahoma	Oklahoma
Seminole Nation of Oklahoma	Oklahoma
Seminole Tribe of Florida	Florida
Shawnee Tribe, Oklahoma	Oklahoma
Thlopthlocco Tribal Town	Oklahoma
Tunica-Biloxi Indian Tribe of Louisiana	Louisiana
United Keetoowah Band of Cherokee Indians in Oklahoma ¹	Oklahoma

Table 2-1. American Tribes that Received Notification Letters

¹Letters sent to both Chief and Tribal Historic Preservation Officer.

2.4 INTERAGENCY MEETING

USACE held an interagency meeting, by web conference, with state and federal agencies prior to the public meetings. An email, included in Appendix C, was distributed to individuals representing several agencies including the Alabama Department of Conservation and Natural Resources, Alabama Department of

Environmental Management, Alabama Office of Water Resources (ALOWR), Federal Energy Regulation Commission (FERC), Georgia Department of Natural Resources, National Marine Fisheries Service, National Park Service, Natural Resources Conservation Service, Southeastern Power Administration (SEPA), U.S. Coast Guard, U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), U.S. Forest Service, and U.S. Geological Survey. Two agencies participated in person and six agencies participated by phone in the 1.5-hour meeting. Participants also were invited to attend the public meetings. Several agency representatives that participated in the web meeting attended the public meetings and some of them attended more than one of the meetings.

2.5 PUBLIC SCOPING MEETINGS

USACE held its public scoping meetings in five locations throughout the study area on the following dates:

- Monday, July 30, 2018: Cauble Park Beach House, Acworth, GA, 4:00 p.m. 8:00 p.m.
- Tuesday, July 31, 2018: Forum River Civic Center, Rome, GA, 4:00 p.m. 8:00 p.m.
- Wednesday, August 1, 2018: The Pitman Theater, Gadsden, AL, 4:00 p.m. 8:00 p.m.
- Thursday, August 2, 2018: Friends on Eighth, Childersburg, AL, 4:00 p.m. 8:00 p.m.
- Friday, August 3, 2018: AUM Center for Lifelong Learning, Montgomery, AL, 4:00 p.m. 8:00 p.m.

The meeting locations were chosen based on their accessibility to the public throughout the ACT River Basin. The meetings were presented in an open house format that allowed attendees to interact with and ask questions of USACE technical experts. Six stations were set up at each meeting with poster displays, fact sheets, a basin puzzle, two interactive canvassing exercises, comment forms and an on-site court reporter so attendees could submit their comments verbally. Appendix D provides the poster displays and fact sheets.

Overall, the public scoping meetings were well attended. Cumulatively, there were 407 attendees at the public meetings (Table 2-2). Attendees included a limited number of representatives from local U.S. congressional offices, state and local agencies, elected officials, APC, and local news media. The largest share of meeting attendees were members of organizations representing lake users and landowners at Allatoona, Weiss, and Logan Martin lakes, environmental interests, and business interests (primarily recreation and tourism); and members of the public. Several people attended more than one meetings.

Date	Location	Attendance
July 30, 2018	Acworth, GA	156
July 31, 2018	Rome, GA	73
August 1, 2018	Gadsden, AL	141
August 2, 2018	Childersburg, AL	24
August 3, 2018	Montgomery, AL	13
	Total	407

Table 2-2. Participants by Scoping Meeting Location

2.6 INTERACTIVE CANVASSING

In addition to seeking written and verbal comments at the public meetings, the PDT conducted two interactive canvassing exercises at each meeting using: (1) a poster with a wide ranging list of environmental considerations common to environmental impact analyses of large water resource projects on which attendees could place dots

by the issues most important to them, and (2) posters with selected open-ended questions on which attendees could place Post-it Notes with specific comments and suggestions. Table 2-3 provides the response of each of the two interactive canvassing exercises at each location.

Meeting Location	Acworth, GA	Rome, GA	Gadsden, AL	Childersburg, AL	Montgomery, AL	Cumulative (All Meetings)
Attendees	156	73	141	24	13	407
Dot Exercise (# of Participants)	85	41	110	10	2	248
Dot Exercise (% Participation)	55%	56%	78%	42%	15%	61%
Open-Ended Questions Responsesª	11	7	0	0	0	18

Table 2-3.	Interactive Canvassir	ng Participation
		ig i aidoipadoil

Note:

^a Multiple responses came from respondents. The percent of participation could not be presented.

Environmental resources and considerations were listed on one poster for meeting attendees to identify the ones that were most important to them. Each attendee was given four different colored dots each marked with a number, #1 through #4, representing a decreasing order of importance. Table 2-4 summarizes participation in the dot canvassing exercise at each of the public meetings as well as cumulative participation. Cumulatively, over the course of the five public scoping meetings, approximately 61 percent of the attendees identified environmental resources and considerations that were most important to them. The highest participation rate was in Gadsden at 78 percent and the lowest participation rate was in Montgomery at 15 percent.

The list of resources and considerations presented to the attendees consisted of a broad range of project purposes and environmental considerations typically addressed in an environmental impact analysis for large multipurpose water resource projects. The intent of the exercise was to gain an initial sense from meeting participants of the critical issues and concerns most important to stakeholders.

Environmental Resource	Percent of Total by Location				
	Acworth	Rome	Gadsden	Childersburg	Montgomery
Air Quality	0.3%	0.0%	1.6%	5.0%	0.0%
Cultural Resources	0.9%	0.0%	0.0%	0.0%	0.0%
Environmental Justice & Protection of Children	0.3%	1.2%	0.5%	2.5%	0.0%
Fish and Aquatic Resources	8.0%	13.3%	13.2%	2.5%	0.0%
Flood Risk Management Concerns	9.2%	9.1%	9.3%	17.5%	0.0%
Groundwater	0.9%	1.2%	1.1%	0.0%	0.0%
Historical, Present, and Future Water Quantity Needs	6.5%	2.4%	3.9%	2.5%	12.5%
Hydropower	2.7%	3.0%	1.1%	0.0%	12.5%
Land Use	3.3%	0.0%	0.0%	2.5%	0.0%
Navigation	5.0%	11.5%	6.3%	0.0%	12.5%
Population	0.0%	1.2%	0.9%	0.0%	0.0%
Recreation	23.1%	12.1%	17.7%	20.0%	25.0%
Surface Water Reservoirs	1.8%	2.4%	2.5%	0.0%	0.0%
Terrestrial & Wetland Vegetation	0.9%	1.2%	2.0%	5.0%	0.0%
Threatened & Endangered Species	4.4%	2.4%	1.6%	10.0%	12.5%
Water Quality	13.9%	18.8%	20.6%	22.5%	12.5%
Water Supply	15.1%	14.5%	15.0%	7.5%	12.5%
Wildlife	3.8%	5.5%	2.3%	0.0%	0.0%
Tourism ^a	0.0%	0.0%	0.5%	0.0%	0.0%
Property Value ^a	0.0%	0.0%	0.0%	2.5%	0.0%
Total Number of Dots	338	165	441	40	8

Table 2-4	Scoping Meeting	Participants' Most	Important Environmental Resources
	ocoping meeting	ji anticipanto moot	

Note:

^a Resources added by participants.

Meeting attendees were also invited to respond to the following open-ended questions, after reviewing the posters, presenting preliminary measures that USACE is considering for water supply and for flood operations:

- What flood operations measures (other than those identified by USACE) should USACE consider?
- What water supply measures (other than those identified by USACE) should USACE consider?

Responses were received at the Acworth and Rome meetings from attendees who placed Post-it Notes on posters with the specific suggestions. The suggestions received included:

- Water Supply. Dredging (Allatoona Lake) to increase storage; raising the pool at Allatoona Lake; evaluating abandoned mines for additional storage; increasing conservation pricing to discourage excessive water use; and accessing water from the Tennessee River.
- **Flood Operations.** Keeping Allatoona Lake higher in winter, if possible; raising water levels in Weiss Lake for recreational purposes; and evaluating economic impact of higher water levels at Weiss Lake.

2.7 SCOPING COMMENTS

The scoping process resulted in the submission of 172 comments from individuals, organizations, and agencies and two petitions. USACE received comments on written forms (Acworth 25, Rome 9, Gadsden 28, Childersburg 4, and Montgomery 0) and oral comments (Acworth 12, Rome 10, Gadsden 23, Childersburg 2, and Montgomery 0) at public meetings, as well as through letters and email following the public meetings (Table 2-5).

Source of Comments	Number of Comments Received	
Forms at Scoping Meetings	66	
Court Reporter	47	
Emails	53	
Other Letters	6	
Total	172	

Table 2-5. Comments Received

Comment forms gave stakeholders the opportunity to select categories for their input using check boxes in addition to offering space for written comments. Figure 2-1 summarizes the response by comment category from the comment forms. The greatest interest was expressed in lake levels (18%), recreation (13%), and water quality (11%). A similar response was seen in the comments overall.

The comments received were initially assigned to one of five categories: NEPA; project operations for authorized purposes; water management practices; environmental resources (natural, cultural, and socioeconomic); and data, studies, and analytical tools (Figure 2-2). Each of these categories was further divided into subcategories to describe stakeholder issues and recommendations. Nearly half of the comments received were related to environmental resources.

Most comments in the environmental resources category were related to lake levels associated with water-based recreation (27 percent) and employment and regional economic concerns (25 percent). These comments were followed by concerns over water quality (14 percent) and fisheries and aquatic habitat (10 percent). Figure 2-3 illustrates the percentage of all the subcategories within the environmental resources category.



Figure 2-1. Summary of Comment Categories from Comment Forms.







Figure 2-3. Summary of Environmental Resource Scoping Comments Received.

3.0 SCOPING COMMENT ANALYSIS

All public scoping comments submitted by letters, emails, comment forms at the public meetings, and court reporter transcripts were categorized and summarized to facilitate a more complete understanding of the critical issues and recommendations from the scoping process across multiple areas of interest. Those key areas of interest at which the comments and recommendations were directed include the NEPA process; authorized project purposes; water management (reservoir operations); water quality; biological, recreation, socioeconomic, and other environmental resources; and data, studies, and analytical tools used in the study. Comments recorded and summarized for each of these categories are presented in Appendix E. The following subsections provide a general overview of the key issues and recommendations received as comments that are applicable to each identified area of interest for the study.

During the conduct of the study and preparation of the SEIS, USACE will consider each comment and/or recommendation presented in Appendix E. The draft SEIS will include a table that displays all of the scoping comments in Appendix E with an additional column to describe the USACE disposition of each comment (i.e., how USACE addressed the comment, including where in the integrated study and SEIS the concern or recommendation is more specifically discussed).

3.1 NATIONAL ENVIRONMENTAL POLICY ACT PROCESS

The NEPA process comments generally focused on the following issues: (1) defining the appropriate No Action Alternative (NAA) or baseline condition, (2) clarifying the appropriate role of a climate change analysis in the alternative evaluation, (3) combining the proposed water supply storage reallocation at Allatoona Lake and proposed guide curve and flood operation changes at the Weiss and Logan Martin projects in a single SEIS, (4) giving fair consideration to all interests, and (5) scoping meetings and future public meetings. Each of these issue areas is discussed below.

3.1.1 No Action Alternative / Baseline Condition

Differing opinions were offered regarding the appropriate definition of the NAA (or baseline condition), which will be the basis for comparison of the effects of all the alternatives evaluated in detail. Generally, interests in Georgia assert that the NAA should include water withdrawals at Allatoona Lake at their current levels, and interests in Alabama and the Southeastern Federal Power Customers, Inc. (SeFPC) assert that the NAA should reflect water withdrawals "capped" at the levels available under the current storage contracts. Georgia interests recommended that USACE evaluate an "alternative baseline condition" (which would include withdrawals capped at levels available under the current storage contract) for comparison to the NAA with current withdrawal levels. Alabama interests questioned the legal basis of, and need for, any reallocation of storage for water supply in Allatoona Lake.

3.1.2 Role of Climate Change in Alternative Analysis

Georgia interests expressed some concerns about how the climate change analysis would be applied to evaluating the alternatives. While those interests had no objection to the use of the climate change analysis, they recommended that all alternatives be compared under the same set of modeling assumptions and hydrologic period of record and that a separate climate change analysis be conducted to show the potential effects of future climate scenarios on the alternatives.

3.1.3 Combining the Allatoona Reallocation Study and the Weiss / Logan Martin Flood Operation Study in a Single SEIS

Multiple interests in Georgia and Alabama recommended against considering the water supply storage reallocation study and flood operations evaluation in a single SEIS for a variety of reasons, each interest identifying specific issues and concerns associated with each action. Most commenters were concerned that the level of effort and the general timetable for decision-making on one action would be delayed by complication and controversy with the other action. Alabama interests asserted that an Environmental Assessment would be sufficient for proposed changes to guide curves and flood operations at the Weiss and Logan Martin projects.

3.1.4 Fair Consideration to All Interests in the NEPA Process

Numerous Allatoona Lake property owners and recreational users expressed concern via petitions and individual comments that their comments and recommendations regarding the lake would not be given consideration equal to the interests of the Georgia Environmental Protection Division (GAEPD), Atlanta Regional Commission (ARC), Cobb County-Marietta Water Authority (CCMWA), and APC. These lake interests specifically requested the opportunity to be more involved throughout the study process. Numerous property owners and recreational users of Weiss and Logan Martin expressed concern about APC shoreline and natural resources management activities, or lack thereof.

3.1.5 Scoping Meetings and Future Public Meetings

A number of commenters provided constructive criticism and suggestions for changing or improving methods of public meeting notification, particularly for local stakeholders around the lakes. Several suggestions were offered regarding the locations of future meetings. Several public meeting participants offered comments on improving the presentation of information and the canvassing exercise at the meetings.

3.2 PROJECT PURPOSES

Comments related to the federally authorized project purposes at Allatoona, Weiss, and Logan Martin lakes are presented in this section, with focus on the potential effects on those authorized purposes due to proposed changes in water supply operations at Allatoona Lake and the proposed guide curve and flood operation changes at Weiss and Logan Martin lakes.

3.2.1 Water Supply (Allatoona Lake)

Commenters provided the following general concerns and recommendations on water supply considerations: (1) maintain focus on water conservation and efficiency measures; (2) the accuracy and completeness of water supply demand projections in Georgia's water supply request; (3) limits on the authority to reallocate storage under the Water Supply Act of 1958 (WSA 1958); (4) current exceedances of contracted storage amounts; and (5) water withdrawal and water supply storage alternatives. Each is individually discussed below.

3.2.1.1 Focus on Conservation/Efficiency Measures

Several commenters encouraged continued focus on water conservation and water use efficiency measures to reduce demand, unnecessary water use, and the need for increased withdrawals.

3.2.1.2 Accuracy and Completeness of Water Supply Demand Projections in Georgia's Water Supply Request

Georgia interests maintained that the water supply request for Allatoona Lake accurately reflects 2050 water supply demands for the service area and is based on a proper storage accounting methodology that correctly accounts for "made inflows" from wastewater treatment facilities and releases from Hickory Log Creek Reservoir.
Georgia interests also maintained that a determination of "major effect" on project purposes associated with reallocating reservoir storage to water supply should follow guidance in the USACE 2012 legal memorandum indicating that USACE evaluation should focus on actual effects on project purposes rather than an arbitrary percentage of reservoir storage. Alabama interests strongly disagree with Georgia interests regarding the thoroughness and accuracy of the 2050 demand projections provided by ARC and CCMWA in support of Georgia's water supply request. They further maintained that the Georgia request should address the need for volume of storage in acre-feet rather than an average withdrawal rate. Alabama interests had questions about the impact of Richland Creek Reservoir (new water supply source for Paulding County, Georgia) on Georgia's water supply request for increased withdrawals at Allatoona Lake. Alabama interests further maintained that Georgia's water supply request does not, but should, consider incremental allocations of storage over time as demands increase. They also expressed concern that the water supply request does not consider the downstream effects of the requested allocation of "made inflows" (for wastewater treatment returns and Hickory Log Creek Reservoir).

3.2.1.3 Limits on Authority to Reallocate Storage under the Water Supply Act of 1958

Alabama interests and the SeFPC indicated that USACE must recognize limits on its authority to reallocate storage at Allatoona Lake under the WSA 1958. Water supply is an authorized project purpose at Allatoona Lake. These interests contend extent of this authorization, however, is set forth by the current contracts at Allatoona Lake with USACE.

3.2.1.4 Exceedances of Contracted Storage Amounts

Concerns were expressed by Alabama interests and the SeFPC about CCMWA withdrawals that have routinely exceeded the water storage contract limits. They maintained that USACE to date has not enforced the terms of the storage contract and assert that USACE needs an enforcement mechanism to prevent future withdrawals in excess of contracted amounts.

3.2.1.5 Water Withdrawal and Water Supply Storage Alternatives

Multiple commenters suggested that USACE consider water supply withdrawal and/or storage alternatives in lieu of increased withdrawals from Allatoona Lake. Suggestions included considering other water supply sources such as construction of more regional water supply reservoirs and accessing water from the Tennessee River. One commenter suggested specific off-stream storage options, including abandoned quarries and mines, near Allatoona Lake and the Etowah River. Commenters asserted that Atlanta has not adequately planned for growth and increased water supply needs and that no long-range water supply plan exists for Metro Atlanta. Multiple commenters stated that it is not appropriate to allow more water to be withdrawn from Allatoona Lake to sell to other municipalities that are not near or adjacent to the lake.

3.2.2 Flood Risk Management (Allatoona Lake, Weiss Lake, and Logan Martin Lake)

Commenters provided the following general concerns and recommendations on flood risk management: (1) potential effects of the recent court decision on the FERC license for APC Coosa River projects on the Weiss / Logan Martin "flood study"; (2) flood risk considerations for Weiss and Logan Martin lakes; and (3) flood risk considerations for Allatoona Lake. Each is discussed below.

3.2.2.1 Potential Effects of July 2018 Court Decision on FERC License on Weiss / Logan Martin "Flood Study"

GAEPD commented that USACE should consider the effects of the July 2018 decision by the U.S. Court of Appeals for the D.C. Circuit—which overturned FERC's 2013 relicensing decision on the APC Coosa River projects and vacated the APC license—on APC's ability to modify flood operations based on the outcome of the USACE

flood study of the proposed modifications. Public Law (P.L.) 83-436 significantly limits the ability of APC to implement changes that would minimize flood control storage. USACE should not consider factoring available flood storage in Allatoona Lake into their analysis of whether proposed changes at the Weiss and Logan Martin projects comply with the provisions of P.L. 83-436.

3.2.2.2 Weiss Lake and Logan Martin Lake Flood Risk Considerations

APC asserted that flood impacts from proposed changes will be minimal and would not appreciably change current operations at the Weiss and Logan Martin projects. Multiple commenters expressed support for raising winter pool levels at Weiss and Logan Martin lakes unless studies demonstrate that flood risk would increase. One commenter stressed the need for stronger enforcement by APC of flood easement conditions at Weiss Lake.

3.2.2.3 Allatoona Lake Flood Risk Considerations

One commenter recommended that USACE commission an objective Flood Retention Risk Assessment Update for Allatoona Lake based on the now 120 years of weather history to work toward a goal of reduced required winter drawdown levels for flood storage purposes. Other commenters requested that USACE consider the potential impacts of water supply scenarios at Allatoona Lake on flood risk and, in considering water supply needs, maintain a strong focus and high priority on the flood risk management purpose for Allatoona Lake.

3.2.3 Hydropower (Allatoona Lake)

Strong concerns were expressed by Alabama interests, federal power customers, and others that water supply operations would result in reduced flows in the ACT River Basin and, consequently, reduced hydropower generation at the Allatoona project and at downstream APC projects, including the Weiss and Logan Martin projects. Commenters noted that the Allatoona project was specifically authorized for hydropower generation rather than generally authorized for water supply under the authority of the WSA 1958, with storage volumes limited to those granted in storage contracts with USACE developed in accordance with applicable laws and regulations. Commenters also noted (1) USACE analysis of hydropower operations should consider the potential increasing value of hydropower generation in the future, including forecasted energy prices available from the SEPA, and (2) USACE should examine impacts to hydropower during seasonably sensitive times when low flows could have the most severe effects on hydropower value.

3.2.4 Navigation (Allatoona Lake, Weiss Lake, and Logan Martin Lake)

Alabama interests commented that any analysis of Allatoona Lake water supply operations should consider potential impacts on downstream commercial navigation. Navigation is not only a specifically authorized purpose of the USACE projects in the ACT River Basin, but also historically important for commerce in Alabama.

3.2.5 Recreation (Allatoona Lake)

Generally, stakeholder comments were not directed at the potential impacts of Georgia's water supply request on the federally authorized project purpose of *recreation* at Allatoona Lake. Multiple comments, however, addressed the potential impacts on recreation resources and activities at Allatoona, Weiss, and Logan Martin lakes associated with both Georgia's water supply request at Allatoona Lake and proposed changes to guide curves and flood operations at Weiss and Logan Martin lakes. Those recreation resource comments are summarized in Section 3.4.3.

3.2.6 Water Quality (Allatoona Lake)

Generally, stakeholder comments were not directed at the potential impacts of Georgia's water supply request on the federally authorized project purpose of *water quality* at Allatoona Lake. Multiple comments, however, addressed the potential impacts on water quality conditions in Allatoona, Weiss, and Logan Martin lakes

associated with both Georgia's water supply request at Allatoona Lake and proposed changes to guide curves and flood operations at Weiss and Logan Martin lakes. Those water quality comments are summarized in Section 3.4.1.

3.3 WATER MANAGEMENT

The comments summarized in this section either present specific concerns with existing water management practices at Allatoona, Weiss, and Logan Martin lakes and their effects throughout the ACT River Basin or recommend modifications to water management practices at those projects to improve conditions in the basin. The comments address the following general issues: (1) reservoir storage accounting methodology; (2) flow conditions downstream of Allatoona Dam; (3) changes to guide curves / flood operations at Weiss and Logan Martin lakes; (4) Allatoona Lake water management concerns and recommendations; (5) other Weiss Lake and Logan Martin lake water management concerns and recommendations; and (6) improved weather forecasting and reservoir water management. Each issue area is discussed individually below.

3.3.1 Reservoir Storage Accounting Methodology

Commenters made numerous comments about the USACE storage accounting rules for water supply storage at Allatoona Lake. Georgia interests commented that the rules are administered incorrectly by USACE, as they fail to provide credit for "made inflows," to accurately account for "made inflows," and to ensure accounting rules recognize seasonal variations in conservation storage. Georgia interests assert that errors in the current storage accounting rules deprive water supply users of a sizable portion of the yield to which they are entitled. Alabama interests concur with the current storage accounting methodology as applied by USACE.

3.3.2 Flow Conditions Downstream of Allatoona Dam

APC and other users in Alabama rely on flows from the Allatoona project to meet certain downstream flow obligations and commitments for navigation, species conservation and protection, water quality, municipal and industrial (M&I) use, and recreation. Potential for reduced flows in the Coosa River due to increased withdrawals in Allatoona Lake might even require modifications to the operation of APC Tallapoosa River projects (in the form of increased releases) to meet downstream needs below Montgomery, Alabama.

3.3.3 Changes to Guide Curves / Flood Operations at Weiss and Logan Martin Lakes

APC stated that the proposed revisions to the flood operations for the Weiss and Logan Martin projects include revising the Weiss and Logan Martin rule curves to raise the winter pool levels and to lower the upper limit of the induced surcharge operations at each reservoir. The company commented that these changes would have minimal impacts on flood risk and current flood operations would be minimally affected by the changes. APC further stated that the current WCMs for both reservoirs contain surcharge curves with elevations higher than the respective flood easements acquired by APC and, subsequently, approved by FERC, following consultation with USACE during original licensing of the upper Coosa River projects.

3.3.4 Allatoona Lake Water Management Concerns and Recommendations

Numerous commenters offered a wide variety of suggestions for guide curve and/or action zone modifications at Allatoona Lake intended to maintain a higher pool for a longer portion of the year. A commenter suggested that the reallocation study should consider the extent of any interbasin transfers out of the Upper Coosa Basin that result from any water supply operations at Allatoona Lake or the Richland Creek Reservoir. Another commenter suggested that USACE should work with SEPA, CCMWA, and the city of Cartersville, Georgia to develop seasonal market-based power and water supply pricing formulas to achieve an appropriate balance between use of Allatoona Lake for hydropower generation and water supply. Multiple commenters expressed concern that

reallocation of additional storage for water supply would result in lower lake level conditions than would be expected under the status quo.

3.3.5 Other Weiss Lake and Logan Martin Lake Water Management Concerns and Recommendations

Multiple commenters expressed support for raising winter pool levels at Weiss and Logan Martin lakes as requested by APC. Commenters also suggested a wide variety of other potential water management measures to improve lake level conditions in those lakes throughout the year. Numerous commenters had major concerns with current operations (excessively low winter pool levels) at Weiss and Logan Martin lakes. USEPA requested evaluation of potential downstream effects associated with raising the winter pool levels at Weiss and Logan Martin lakes. Martin lakes.

3.3.6 Improved Weather Forecasting and Reservoir Water Management

Several commenters suggested that, with today's accurate and constantly improving weather forecasting capability, USACE and APC can more proactively manage lake levels to mitigate extreme flooding and drought possibilities throughout the year. Technology investments in water management and weather forecasting should be mandatory for all agencies/companies involved in local, state, and federal water management practices.

3.4 ENVIRONMENTAL RESOURCES CONSIDERATIONS

Comments on environmental resources considerations generally fell into the following basic areas: water quality; biological resources; recreation resources; socioeconomic resources; and other environmental resources. Each resource area is discussed individually below.

3.4.1 Water Quality

Water quality comments focused on concerns and recommendations related to water quality conditions in Allatoona Lake and downstream of Allatoona Dam. Water quality may be affected by increased water supply withdrawals from Allatoona Lake and changes to guide curves and flood operations at Weiss and Logan Martin lakes. Commenters expressed concerns regarding the potential water quality effects of significantly larger water supply withdrawals from, and treated wastewater returns to, Allatoona Lake including the effects of reduced lake levels on water quality in the lake. Other commenters expressed concerns about high Escherichia coli (E. coli) counts in Allatoona Lake. Alabama interests expressed concerns about potentially degraded water quality conditions over the entire extent of the Coosa River to Montgomery, including Weiss and Logan Martin lakes and the other APC reservoirs along the Coosa River. Specific concerns included those associated with reduced downstream flow conditions due to increased water supply withdrawals at Allatoona Lake such as worsened nutrient conditions in Weiss and Logan Martin lakes. Generally poorer water quality conditions throughout the system, potential effects on existing National Pollutant Discharge Elimination System (NPDES) permits, and potential increased costs to comply with NPDES permits were also a concern. Multiple commenters stated that the proposed increase to winter pool levels in Weiss and Logan Martin lakes would improve water quality in those locations.

3.4.2 Biological Resources

Commenters shared concerns and recommendations regarding the effect of proposed changes to water supply operations at Allatoona Lake and of proposed changes to guide curves and flood operations at Weiss and Logan Martin lakes on fish and wildlife resources. The comments addressed potential effects related to the fish and wildlife resources, including: (1) effects of reduced flows downstream of Allatoona Dam; (2) effects of lower lake levels in Allatoona Lake; (3) potential benefits of proposed guide curve and flood operations changes at Weiss

and Logan Martin lakes; (4) potential wetland effects; and (5) effects on threatened and endangered species. Each comment area is summarized below.

3.4.2.1 Impacts of Reduced Flows Downstream of Allatoona Dam on Fish and Wildlife Resources

Multiple commenters, particularly residents and recreational users, expressed concerns about the potential impacts on fish and wildlife resources of Weiss and Logan Martin lakes caused by reduced downstream flows into those lakes resulting from increased water supply withdrawals in Allatoona Lake. These concerns include increased invasive aquatic vegetation and poorer water quality, potentially resulting in more incidences of fish kills in Weiss and Logan Martin lakes.

3.4.2.2 Impacts of Lower Lake Levels at Allatoona Lake on Fish and Wildlife Resources

Multiple commenters, particularly residents and recreational users around Allatoona Lake, expressed concerns about the potential impacts on fish and wildlife resources of Allatoona Lake resulting from proposed changes to water supply operations. Assuming that increased water supply withdrawals could adversely lower lake levels compared to the status quo, these potential effects on fish and wildlife include a decrease in habitat quality for eagles and osprey residing on the lake, a decrease in aquatic habitat quality for fish (lower dissolved oxygen levels, increased algae blooms, and increased fish stress).

3.4.2.3 Fish and Wildlife Benefits of Proposed Changes to Guide Curves and Flood Operations at Weiss and Logan Martin Projects

Multiple commenters, particularly residents and recreational users, were extremely supportive of the APC proposal to change the guide curves and flood operations at Weiss and Logan Martin lakes, particularly to increase the winter pool elevations.

3.4.2.4 Wetlands

One commenter requested that no change be made to flood easements at Weiss Lake, indicating that the current flood easements are necessary to protect wetlands around the lake.

3.4.2.5 Endangered Species

Multiple commenters expressed concerns about potential effects on threatened and endangered species of the proposed changes to water supply operations at Allatoona Lake and the proposed guide curve/flood operations changes at the Weiss and Logan Martin projects. USEPA encouraged active engagement with USFWS on endangered species protection.

3.4.3 Recreation Resources

Commenters generally expressed concerns or made recommendations regarding the potential effects of increased water supply withdrawals from Allatoona Lake and changes to the guide curves and flood operations at Weiss and Logan Martin lakes on the quality of the recreation experience at these reservoir projects and on the river reaches between them. Commenters recommended that USACE evaluate the potential impacts to recreation activity of decreases in flow and lake-level conditions (associated with proposed increased withdrawals) at all APC Coosa River lakes downstream of Allatoona Lake. They expressed strong concerns about the adverse effects of current winter pool levels at Weiss and Logan Martin lakes on recreation activity (primarily boating) and supported the APC proposal to raise winter pool levels at both projects, citing broader access to all areas of those lakes and reduction in the risk of groundings and boating accidents. Allatoona Lake interests expressed concerns about the potential adverse impacts on lake levels of increased water supply withdrawals; they were also concerned that the USACE evaluation address these lake level effects under extreme

drought conditions and not simply rely on an analysis based upon "average" conditions for water supply withdrawals and lake levels, as those conditions would understate the most adverse effects.

3.4.4 Socioeconomic Resources

Scoping comments on potential socioeconomic effects focused on the following issues: (1) affected communities including low-income and minority populations; (2) effects of the proposed water withdrawal increase at Allatoona Lake on socioeconomic values at the lake; (3) socioeconomic effects of current operations at Weiss and Logan Martin lakes; (4) effects of proposed water supply operations at Allatoona Lake on socioeconomic values at Weiss and Logan Martin lakes; and (5) potential socioeconomic benefits of proposed changes to guide curves and flood operations at Weiss Lake and Logan Martin Lake.

3.4.4.1 Effects on Low-Income and Minority Populations

USEPA specifically recommended consideration of impacts to affected communities, including low-income and minority populations (environmental justice considerations).

3.4.4.2 Effects of Increased Water Supply Withdrawals on Allatoona Lake

Multiple commenters, largely representing residents/property owners and recreational users of Allatoona Lake, expressed strong concerns about the potential adverse impacts of increased water withdrawals (per Georgia's water supply request) on lake levels and, in turn, water-based recreational activities, boat docks, marinas, other associated businesses, and property values on the lake.

3.4.4.3 Effects of Current Operations at Weiss and Logan Martin Lakes

Multiple commenters, largely representing residents/property owners and recreational users of Weiss and Logan Martin lakes, expressed concerns about the devastating recreational and economic impacts associated with current water management practices at Weiss and Logan Martin lakes, specifically the current winter drawdown levels on both lakes. Recreational boating during winter months is severely limited, and boat groundings, boating safety, and impacts to docks and marinas are common problems. Also, there are significant economic impacts on local businesses, business revenues and tax revenues, tourism, and property values due to current operations at these projects.

3.4.4.4 Effects of Increased Water Supply Withdrawals Downstream of Allatoona Lake

Commenters expressed concern that Georgia's water supply request could impact downstream flows below Allatoona Lake and further lower lake levels at Weiss and Logan Martin lakes. Further lowering of the lake levels would exacerbate the effects of current operations on recreational boating and local economic conditions, as described in Section 3.4.4.3, or partially offset the benefits of proposed operational changes at Weiss and Logan Martin lakes.

3.4.4.5 Effects of Proposed Changes at Weiss and Logan Martin Lakes

Multiple commenters, representing residents/property owners and recreational users of Weiss and Logan Martin lakes, strongly supported raising the winter pool levels at the lakes. Raising winter pool levels at the projects would increase boating access, reduce boating safety issues, benefit tourism and local businesses (business and tax revenue), and provide water access to many buildable lots and existing homes year-round.

3.4.5 Other Environmental Resources

The only other environmental resource issue raised during the public scoping process was the recommendation for a plan to better control rubbish, trash, and litter that gets dumped into Weiss Lake.

3.5 DATA, STUDIES, AND ANALYTICAL TOOLS

Comments and recommendations on data, studies, and analytical tools to be used during this study focused on coordination of USACE and other modeling efforts with agencies and stakeholders and on specific critical issues that should be addressed in the modeling and analysis of modeling results.

3.5.1 Coordination of USACE Modeling Efforts

USEPA and other commenters recommended further consultation and/or more interaction with USACE prior to and during modeling efforts to evaluate the proposed action and alternatives.

3.5.2 Specific Issues to Address during Modeling

Commenters identified specific issues that the modeling and analysis of modeling results should address, including (1) greater focus on both drought and non-drought periods; (2) greater consideration of the effects of Georgia's water supply request on Coosa River flow conditions at the Georgia-Alabama state line; (3) closer examination of downstream water quality issues and impacts; (4) inclusion of both Richland Creek Reservoir operations and proposed Allatoona Lake water supply operations in the models; and (5) inclusion of actual withdrawals at Allatoona Lake versus withdrawals "capped" at levels provided under the current storage contract.

4.0 FEDERAL, STATE, AND LOCAL AGENCY COMMENTS

This section of the scoping report provides a summary of scoping comments submitted by federal, state, and local agencies, including public utilities that have a direct interest or involvement in the proposed water supply storage reallocation at Allatoona Lake and/or the proposed rule curve and flood operation changes at Weiss and Logan Martin lakes. The scoping comments from these entities, as summarized below, identify the overarching concerns and recommendations addressed in their individual comment letters. Their detailed comments and recommendations are captured and presented in the Scoping Comment Summary table in Appendix E.

4.1 FEDERAL AGENCIES

The only federal agency providing written scoping comments on the project was USEPA, Region 4. USEPA comments and recommendations, provided by email dated August 15, 2018, are as follows:

- Continue implementation of efficiency or conservation measures as a mechanism to minimize water supply withdrawal or storage use.
- Address how the proposed modification to the winter pool levels at the Weiss and Logan Martin projects might affect downstream flows in the basin and impact the overall operations of the preferred alternative.
- Ensure that the WCM operations meet water quality standards, including downstream uses.
- Provide adequate downstream flows to maintain the physical integrity of the habitat.
- Engage USFWS on issues related to the protection of threatened and endangered species.
- Consider impacts to affected communities, including low-income and minority populations.
- Consult further with USEPA staff regarding USACE modeling efforts prior to the development of the SEIS.

4.2 POLITICAL ENTITIES

No written scoping comments were provided from the offices of U.S. congressional representatives (Senate or House of Representatives) from either Alabama or Georgia. No written scoping comments were provided from the Office of the Governor or elected representatives in state legislatures either in Alabama or Georgia.

4.3 STATE AGENCIES

4.3.1 Alabama Office of Water Resources

ALOWR provided scoping comments and recommendations by letter dated August 15, 2018. A summary of the scoping comments offered by ALOWR follows:

- USACE is not obligated to approve additional water supply to Georgia or CCMWA, since Allatoona Lake does not have water supply as a federally authorized purpose.
- CCMWA's history of illegal withdrawals supports the denial of their water supply request or the establishment of strong enforcement mechanisms.
- USACE must establish objectively recognizable numerical limits on storage reallocations under WSA 1958.
- USACE must not adopt Georgia's proposed return credits and storage accounting system.
- The analysis behind Georgia's water supply request is not thorough enough.
- Georgia's March 2018 water supply request fails to consider the option of incremental allocations over time.
- Georgia's technical analysis does not include the likely effect of the concept of "made inflows."
- Georgia's Reservoir Simulation Model (HEC-ResSim) analysis should be reconstructed to include drought and non-drought runs.
- Georgia's March 2018 water supply request fails to address downstream hydropower generation losses.
- Georgia's model analysis does not account for reduced state line flow from Georgia to Alabama.
- Alabama supports, but has some attendant concerns, regarding the proposed Weiss and Logan Martin changes. Alabama understands that materials presented by USACE at the public scoping meetings were not accurate and that actual flood impacts from APC's proposed changes will be minimal. Alabama understands that these proposed changes will not significantly change APC's current project operations at the Weiss and Logan Martin projects.
- Alabama does not understand the need for the Weiss and Logan Martin project changes being included in the USACE SEIS and formally encourages USACE to accept FERC's "finding of no significant impact."

4.3.2 Georgia Department of Natural Resources, Environmental Protection Division

GAEPD provided scoping comments and recommendations by letter dated August 15, 2018. A summary of the scoping comments offered by GAEPD follows:

- USACE must address storage accounting issues as a part of the water supply storage reallocation study.
- The NAA should assume current water supply demands. In other words, it must represent how USACE is currently operating Allatoona Lake.
- USACE should also model "capped withdrawals," not as the NAA, but as an alternative baseline condition to address the disconnect USACE created when it did not consider water supply while updating the ACT WCM.
- The Future Without Project Alternative should assume Georgia's 2050 water supply demand.
- USACE should follow the process outlined in the 2012 legal memorandum authored by the USACE Office
 of Chief Counsel when USACE was determining its authority to reallocate storage at Lake Lanier. The
 2012 memorandum recognized that USACE must focus on how a reallocation might affect other
 authorized project purposes instead of applying an arbitrary percentage to determine whether a given
 reallocation is major without any analysis.
- If USACE proceeds with the inclusion of proposed changes to the rule curves and flood operations at the Weiss and Logan Martin projects, despite the recent court decision and vacating of the FERC license for the APC Coosa River projects, USACE must consider whether the statutory limits placed on APC's ability to modify flood operations at the Coosa River projects prevent USACE from decreasing available flood storage per the specific provisions of P.L. 83-436.

- USACE should not consider factoring in available flood storage at Allatoona Lake to determine whether proposed changes at the Weiss and Logan Martin projects comply with P.L. 83-436.
- Georgia understands that the SEIS will cover two separate studies, the Reallocation Study (Allatoona) and the Flood Study (Weiss/Logan Martin), each with a preferred alternative that will be combined to evaluate the overall impacts of the actions. Georgia maintains that this is the correct approach.

4.4 LOCAL AGENCIES AND PUBLIC UTILITY INTERESTS

No scoping comments were submitted from city or county officials within the study area. Four entities representing public utilities with a direct interest or involvement in the proposed water supply storage reallocation at Allatoona Lake or the proposed rule curve and flood operations changes at Weiss and Logan Martin reservoirs submitted scoping comments. One of the four letters included scoping comments made on behalf of the ARC, which is the regional planning and intergovernmental coordination agency for the 10-county Metro Atlanta region. The concerns and recommendations of each of these entities are summarized below.

4.4.1 Atlanta Regional Commission / Cobb County-Marietta Water Authority

Scoping comments prepared by King and Spaulding, LLP on behalf of CCMWA and ARC (collectively referred to as the Water Supply Providers [WSPs]) were submitted to USACE by letter dated August 15, 2018. A summary of the scoping comments offered by CCMWA/ARC follows:

- USACE should evaluate an alternative that corrects its storage accounting rules at Allatoona Lake.
- The current storage accounting rules improperly deprive CCMWA of "made inflows" granted by the State of Georgia.
- USACE should correct the definition of "conservation storage" in its accounting rules and recognize that all storage accounts must be full whenever conservation storage is full.
- The effects of the errors in the USACE storage accounting rules are significant.
- USACE must evaluate the effect of the proposed action against the appropriate baseline condition.
- The NAA should be the status quo, including current levels of water supply use. For comparison purposes, USACE should also evaluate an alternative baseline showing "capped" withdrawals.
- The NAA and the Future Without Project Condition should be analyzed using the same hydrologic period of record. The effects of climate change should be considered, but in a separate analysis to show the potential effects of the alternatives under possible future climate scenarios.
- The updated Georgia water supply request provides the total projected demand for the WSPs.

4.4.2 Alabama Power Company

Scoping comments from APC were submitted to USACE by letter dated August 15, 2018. A summary of the scoping comments offered by APC follows:

- The scope of analysis of the proposed Allatoona Lake water supply storage reallocation must address the legal basis of, and need for, any reallocation and assess its potential impacts, including downstream impacts to water quality, hydropower, flood control, and navigation.
- Reduced flows from upstream USACE projects could impact APC's ability to meet flow obligations and commitments for navigation, species conservation and protection, water quality, M&I water use, and recreation.
- USACE has not accurately represented the proposed guide curve and associated operational changes for flood risk management at Weiss and Logan Martin lakes. APC is not proposing to change existing easements at either project. Additional evaluation of the potential environmental impacts of APC's proposed changes should not itself require an EIS. An Environmental Assessment alone should be adequate and should focus only on proposed changes to APC flood operations and guide curves at the Weiss and Logan Martin projects.

- The scope of the USACE evaluation of Georgia's March 30, 2018, reallocation request for Allatoona Lake should include the option of denying the request and recognize the legal limits of USACE's authority under the WSA 1958.
- The USACE analysis of the Allatoona Lake reallocation request should consider the practical impacts of its water supply operations at Allatoona Lake, which have often exceeded the legal limits provided under the WSA 1958 and the USACE existing water supply contracts.

4.4.3 Southeastern Federal Power Customers, Inc.

Scoping comments from the SeFPC were submitted to USACE by letter dated August 15, 2018. Members of the SeFPC either directly purchase capacity and energy marketed by SEPA or represent municipally owned utilities and rural electric cooperatives that have power purchase agreements with SEPA. A summary of the scoping comments offered by the SeFPC follows:

- SeFPC encourages USACE to disaggregate the NEPA analysis for proposed changes to the guide curves and flood operations at Weiss and Logan Martin lakes from the analysis necessary to support the State of Georgia's water supply request.
- The current water supply storage contract at Allatoona Lake held by CCMWA is insufficient to meet current and future needs. Because excess withdrawals made by CCMWA are not covered by contract, delays in the evaluation of the storage reallocation request are detrimental to both water supply stakeholders and hydropower customers that rely upon the Allatoona project for capacity and energy.
- USACE must honor the authorized project purposes to establish the proper baseline from which to measure adverse impacts on project purposes. USACE must measure storage to be allocated by amounts heretofore authorized under the authority of the WSA 1958 rather than withdrawal levels that have exceeded the current CCMWA storage contract.
- Consider the congressional mandate to specifically operate the Allatoona project for hydropower production as a primary purpose of the project.
- Water supply is a limited authorized purpose at Allatoona Lake.
- The SEIS must be based upon a proper baseline, with water supply withdrawals limited to those available under current contracts rather than actual withdrawals that have occurred.
- The NEPA analysis requires proper consideration of socioeconomic impacts, including the loss of hydropower benefits associated with water supply storage reallocation.

4.4.4 Montgomery Water Works and Sanitary Sewer Board

Scoping comments prepared by Sasser, Sefton & Brown, P.C. on behalf of the Montgomery Water Works and Sanitary Sewer Board (MWWSSB) were submitted to USACE by letter dated August 15, 2018. A summary of the scoping comments offered by MWWSSB follows:

- The proposed water supply request at Allatoona Lake will further reduce flows in the ACT Basin, causing a variety of environmental concerns and impacts to the MWWSSB, including overall degradation of water quality, impairment of the MWWSSB's ability to adequately treat wastewater, and impairment of MWWSSB's ability to conduct and rely upon long-range planning and analysis.
- Further reductions in flows could potentially affecting MWWSSB's cost to comply with its NPDES permits.
- Examine downstream water quality issues identified by MWWSSB with reliable modeling and tools, and fully evaluate the impacts of the pending water supply request.

4.5 TRIBAL RESPONSE

Of the letters sent to the federally recognized tribes with interest in the general area of the project (see Section 2.3), only one tribe responded. The Quapaw Tribe responded by letter dated August 6, 2018, stating that the project was outside their area of interest and they had no comments at this time. No scoping comment letters were received from any of the other tribes that were contacted.

5.0 SUMMARY OF PUBLIC SCOPING

5.1 RECOMMENDATIONS

One of the more prominent outcomes of the public scoping process was the highly energized participation of members of organizations that represent the interest of property owners, businesses, and recreational users at Allatoona, Weiss, and Logan Martin projects. Those interests are largely represented by, but not exclusively, the Lake Allatoona Association, Weiss Lake Improvement Association, and Logan Martin Lake Protection Association. Based upon the petitions and written comments from these lake interests, the clear messages to USACE were (1) make the study process more transparent and (2) keep them updated on the progress of the study. These requests can be addressed by one or more of the following methods:

- Produce periodic newsletters or web postings that provide updates on the study progress and key study milestones prior to release of the integrated study and SEIS for formal public review.
- Use social media (e.g., District Facebook page) to share information on the study progress, respond to questions from the public, or address rumors and misinformation about the study.
- If requested by one of the above groups or other similar organizations, consider meeting with them to present general information on reservoir water management operations and/or specific issues that are being addressed by the integrated study and SEIS.

Overall, the public scoping comments did not identify significant new issues that might considerably alter the direction of the study. Not unexpectedly, agencies and other interests in Georgia and those in Alabama have diametrically opposing viewpoints about the same issues to be addressed in this study process. While these perceptions and opinions are long-standing and difficult to overcome, USACE can counteract them to the extent possible by maintaining maximum transparency through the process in its interactions with the states of Georgia and Alabama, ARC, CCMWA, APC, SeFPC, other interests, and the public.

5.2 INTEGRATED STUDY AND SEIS SCHEDULE

USACE technical experts will use the information gathered during this scoping effort to create management measures and to evaluate potential alternatives in Fall 2018. The results of initial model runs will be assessed to ensure that project authorities are balanced throughout the ACT River Basin. Final alternatives will then be identified to carry forward for further analysis and to determine their environmental impacts. The draft integrated study and SEIS will be provided to the public in Fall 2019 for comment consistent with NEPA. USACE will offer another series of public meetings allowing stakeholders to speak one-on-one with technical experts to provide their comments on the draft integrated study and SEIS. The comments received on the draft integrated study and SEIS will be considered and updates will be made to finalize the integrated study and SEIS.

APPENDIX A PUBLIC NOTICES

Average Burden per Response: 30 minutes.

Annual Burden Hours: 246,000.

Needs and Uses: The information collection requirement is necessary to obtain PII information which is used by in-country U.S. Embassy approvers to grant country travel clearances, Geographical Combatant Commands approvers to grant theater travel clearances and by the Office of Secretary of Defense for Policy approvers to grant special area travel clearances. Aircrew PII information is used for verification, identification and authentication of travelers for aircraft and personnel travel clearances, as required by DoDD 4500.54E, DoD Foreign Clearance Program.

Affected Public: Individuals or households.

Frequency: On occasion.

Respondent's Obligation: Voluntary.

OMB Desk Officer: Ms. Jasmeet Seehra.

You may also submit comments and recommendations, identified by Docket ID number and title, by the following method:

• Federal eRulemaking Portal: http:// www.regulations.gov. Follow the instructions for submitting comments.

Instructions: All submissions received must include the agency name, Docket ID number, and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at *http:// www.regulations.gov* as they are received without change, including any personal identifiers or contact information.

DOD Clearance Officer: Mr. Frederick Licari.

Written requests for copies of the information collection proposal should be sent to Mr. Licari at *whs.mcalex.esd.mbx.dd-dod-informationcollections@mail.mil.*

Dated: April 25, 2018.

Shelly E. Finke,

Alternate OSD Federal Register Liaison Officer, Department of Defense. [FR Doc. 2018–09009 Filed 4–27–18; 8:45 am] BILLING CODE P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Intent To Prepare Draft Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin

AGENCY: U.S. Army Corps of Engineers, DoD.

ACTION: Notice of intent.

SUMMARY: The U.S. Army Corps of Engineers (USACE), Mobile District, intends to prepare a Supplemental Environmental Impact Statement (SEIS) to evaluate potential changes to the Water Control Manuals (WCMs) for three reservoirs in the Alabama-Coosa-Tallapoosa (ACT) River Basin and to the Master WCM for the ACT River Basin. The USACE intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request by Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release actions of Federal water managers and will evaluate the associated environmental impacts of the proposed federal action, pursuant to the National Environmental Policy Act (NEPA). The USACE also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin.

ADDRESSES: Environment and Resources Branch, Planning and Environmental Division, U.S. Army Engineer District-Mobile, Post Office Box 2288, Mobile, AL 36628–0001.

FOR FURTHER INFORMATION CONTACT: Questions about the NEPA process should be directed to: Mr. Mike Malsom, Inland Environment Team, Environment and Resources Branch, Planning and Environmental Division, U.S. Army Engineer District-Mobile, Post Office Box 2288, Mobile, AL 36628–0001; Telephone (251) 690–2023; delivered by electronic facsimile at (251) 694–3815; or by electronic mail: *ACT-ACR@usace.army.mil.* You may also request to be included on the mailing list for public distribution of notices, meeting announcements and documents.

SUPPLEMENTARY INFORMATION:

Background. Eighteen major dams (six Federal and twelve non-Federal), which form sixteen reservoirs, are located in the ACT River Basin. The ACT River Basin provides water resources for multiple purposes from northwestern Georgia down through central Alabama and to the Gulf Coast at the mouth of Mobile Bay, extending a distance of approximately 320 miles and encompassing an area of approximately 22,800 square miles. Pursuant to Section 7 of the Flood Control Act of 1944, the USACE prescribes regulations for the operation of its projects in the ACT River Basin for their authorized purposes, and for the non-federal projects that contain storage for the purposes of navigation or flood control (flood risk management), through water control plans and manuals.

In May 2015, the USACE completed a long-term effort to update the Master WCM for the ACT River Basin, including updated WCMs for all five USACE projects (Allatoona Dam and Lake, Carters Dam and Lake, Robert F. Henry Lock and Dam, Millers Ferry Lock and Dam and Claiborne Lock and Dam) and two of four Alabama Power Company (APC) projects with navigation or flood control storage (H. Neely Henry Dam and Lake and R.L. Harris Dam and Lake). WCMs for the other two APC projects with navigation and flood control storage, Logan Martin Dam and Lake (Reservoir) and Weiss Dam and Lake (Reservoir), were not updated at that time. A pending request by the State of Georgia for additional water supply storage and changes to storage accounting practices at Allatoona Lake was also not included within the scope of the 2015 WCM update and EIS.

In January 2018, the U.S. District Court for the Northern District of Georgia issued a judgment in Georgia et al. v. U.S. Army Corps of Engineers, No. 14-cv-03593 (Jan. 9, 2018), holding that the USACE had unreasonably delayed action on Georgia's water supply request, and directing the USACE to take final action responding to that request by March 1, 2021. Following that court decision, the State of Georgia and CCMWA submitted an updated request to the USACE on March 30, 2018, and the USACE intends to evaluate actions necessary to respond to Georgia's request, as well as one or more reasonable alternatives, in the proposed SEIS.

The USACE did not include updates to the WCMs for the Weiss and Logan Martin Reservoirs in the 2015 ACT River Basin Master WCM because further study of flood risk management issues at both projects was required. The USACE intends to update the WCMs for two APC reservoir projects in the ACT River Basin, including evaluation of APC's proposal to raise the winter level for recreation and at the same time to lower the upper limit of the induced surcharge operation at the Weiss Dam and Lake (Reservoir) and the Logan Martin Dam and Lake (Reservoir). These projects will be evaluated for flood impacts. Current Water Control Plans for the Weiss and Logan Martin Reservoirs, originally issued in the 1960s, contain surcharge curves with elevations higher than the respective flood easements acquired by APC. The easement at the Weiss Reservoir is 572 feet mean sea level (msl) and the surcharge curve indicates flood control storage to 574 feet msl. At the Logan Martin Reservoir, the easement elevation is 473.5 feet msl and the surcharge curve indicates flood control storage to 477 feet msl. Due to the flood risk management operational responsibilities of the USACE, the APC proposals would be evaluated along with other alternatives in the FR/SEIS and those manuals may be updated.

Because the USACE is simultaneously considering proposals to modify operations and update WCMs at three different ACT River Basin projects, the USACE intends to evaluate the effects of these proposals through a single EIS. which would supplement the Final EIS for the ACT River Basin completed in May 2015. As part of this analysis, the USACE will consider the effects of the proposed changes on operations of the ACT system of projects for all purposes, and would revise the ACT Master WCM to incorporate the updated Allatoona Lake, Weiss Reservoir, and Logan Martin Reservoir WCMs and to reflect changes, if any, in overall system operations.

WCMs are guidance documents that assist Federal water managers in the operation of individual and multiple interdependent Federal reservoirs on the same river system. The manuals provide technical, historical, hydrological, geographic, demographic, policy and other information that guide the proper management of reservoirs during times of high water, low water, and normal conditions. The manuals also contain drought plans and zones to assist Federal water managers in knowing when to reduce or increase reservoir releases, and how to ensure the safety of dams during extreme

conditions. The authority and guidance for the USACE to prepare and update these manuals may be found, inter alia, in Section 7 of the 1944 Flood Control Act, the Federal Power Act, Section 9 of Public Law 436–83, and the following USACE Engineering Regulations (ER): ER 1110–2–240, ER 1110–2–241, ER 1110–2–1941 and ER 1110–2–8156.

The evaluations of the proposed water supply storage reallocation at the Allatoona Lake and the flood impacts at several APC projects in the Coosa Basin may require updates to the current WCMs. The updated WCMs would be provided as appendices to the SEIS.

Public participation throughout the water supply storage reallocation and flood pool evaluation process is essential. The USACE invites full public participation at all stages to promote open communication and better decision making. All persons, stakeholders, and organizations that have an interest in water-related resources in the ACT Basin, including minority, low-income, disadvantaged and Native American groups, are urged to participate in this NEPA analysis process. Assistance will be provided upon request to anyone having difficulty understanding how to participate. Dates and locations for public scoping meetings will be announced by future publication in the Federal Register and in the local news media. Tentative dates for publication of the Draft SEIS and other opportunities for public involvement will also be announced at that time. Public comments are welcomed at any time throughout the NEPA process.

Cooperating Agencies. The lead responsibility for this action rests with the USACE. USACE intends to coordinate and/or consult with an interagency team of Federal and State agencies during scoping and preparation of the FR/SEIS. A decision will be made during the scoping process whether other agencies will serve in an official role as cooperating agencies.

Scoping. The 2015 ACT WCM update involved the States (Alabama and Georgia), stakeholders, and the public, in identifying areas of concern; collecting and developing water resources, environmental, and socioeconomic data; and developing tools to assist in decisions affecting water resources within the Basin. Scoping for this SEIS will continue to build upon the knowledge and information developed during the previous EIS process. Scoping meetings with agencies and stakeholder groups will be scheduled to identify any significant issues and data gaps, focus on the alternatives to be evaluated, and

to identify any appropriate updated tools to assist in the evaluation of alternatives and analysis of impacts.

Curtis M. Flakes,

Chief, Planning and Environmental Division. [FR Doc. 2018–09031 Filed 4–27–18; 8:45 am] BILLING CODE 3720–58–P

DEPARTMENT OF DEFENSE

Department of the Navy

[Docket ID USN-2018-HQ-0007]

Proposed Collection; Comment Request

AGENCY: Department of the Navy, DoD. **ACTION:** Information collection notice.

SUMMARY: In compliance with the Paperwork Reduction Act of 1995, the Department of the Navy announces a proposed public information collection and seeks public comment on the provisions thereof. Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed information collection; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the information collection on respondents, including through the use of automated collection techniques or other forms of information technology.

DATES: Consideration will be given to all comments received by June 29, 2018.

ADDRESSES: You may submit comments, identified by docket number and title, by any of the following methods:

Federal eRulemaking Portal: http://www.regulations.gov. Follow the instructions for submitting comments.

Mail: Department of Defense, Office of the Chief Management Officer, Directorate for Oversight and Compliance, 4800 Mark Center Drive, Mailbox #24 Suite 08D09, Alexandria, VA 22350–1700.

Instructions: All submissions received must include the agency name, docket number, and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at *http:// www.regulations.gov* as they are received without change, including any personal identifiers or contact information. Consumer Education and Engagement, Office of Consumer Response, 1700 G Street NW, Washington DC 20552, (855) 411–2372.

PURPOSE(S) OF THE SYSTEM:

The information in the system is being collected to enable the Bureau to receive, respond to, and refer complaints or inquiries regarding consumer financial products or services. The system serves as a record of the complaint or inquiry, and is used for collecting complaint or inquiry data; responding to or referring the complaint or inquiry; aggregating data that will be used to inform other functions of the Bureau and, as appropriate, other agencies and/or the public; providing related educational and informational content; and preparing reports as required by law. The information will also be used for administrative purposes to ensure quality control, performance, and improving management processes. This system consists of complaints or inquiries received by the Bureau or other entities and information concerning responses to or referrals of these complaints or inquiries, as appropriate.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Individuals covered by this system are individuals who submit complaints or inquiries to the Bureau (on their own or others' behalf), individuals on whose behalf complaints or inquiries are submitted by others (such as attorneys, members of Congress, third party advocates, and/or other governmental organizations); individuals who are the subjects of complaints by virtue of their engagement in business as a sole proprietor, and individuals from other Federal, State agencies, or the Bureau with whom the Bureau shares data. This includes complaints or inquiries received by prudential regulators, Federal Trade Commission, other Federal agencies, State agencies, or the Bureau. The term "prudential regulators" refers to any Federal banking agency, as that term is defined in section 3 of the Federal Deposit Insurance Act, and the National Credit Union Administration. Information collected regarding consumer products and services is subject to the Privacy Act only to the extent that it concerns individuals; information pertaining to corporations and other business entities and organizations is not subject to the Privacy Act. Other individuals covered by this system include employees, contractors, or others at the Bureau who work in or with the Office of Consumer Response.

CATEGORIES OF RECORDS IN THE SYSTEM:

Records in the system may contain: (1) Correspondence or other information received; (2) information from the entity or individual referring the inquiry or complaint; (3) records created of verbal communications by or with complainants or other individuals; (4) information regarding third party advocates or others who submit complaints or inquiries on another's behalf; (5) information identifying the entity that is the subject of the complaint or inquiry or its employees; (6) communication with or by the entity that is the subject of the complaint or inquiry or its employees; (7) unique identifiers, codes, and descriptors categorizing each complaint or inquiry file; (8) information about how complaints or inquiries were responded to or referred, including any resolution; (9) records used to respond to or refer complaints or inquiries, including information in the Bureau's other systems of records; (10) identifiable information regarding both the individual who is making the inquiry or complaint, and the individual on whose behalf such inquiry or complaint is made, and employees of the entity about which the complaint or inquiry was made, including name, Social Security number, account numbers, address, phone number, email address, date of birth; and (11) identifiable information regarding an employee, contractor, or others at the Bureau who access the system, including their name and any login information used to access the consumer response system.

POLICIES AND PRACTICES FOR RETRIEVAL OF RECORDS:

Records are retrievable by a variety of fields including without limitation the individual's name, Social Security number, complaint/inquiry case number, address, account number, transaction number, phone number, email address, date of birth, or by some combination thereof.

HISTORY:

79 FR 21440 (Apr. 16, 2014) (CFPB.005 CFPB Consumer Response System).

Dated: July 5, 2018.

Claire Stapleton,

Chief Privacy Officer, Bureau of Consumer Financial Protection.

[FR Doc. 2018–14990 Filed 7–12–18; 8:45 am]

BILLING CODE 4810-AM-P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Public Scoping Meetings for the Draft Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin

AGENCY: U.S. Army Corps of Engineers, DoD.

ACTION: Supplement to Notice of Intent.

SUMMARY: The U.S. Army Corps of Engineers (USACE), Mobile District, issued a Notice of Intent (NOI) in the Federal Register (83 FR 18829) published on April 30, 2018, to prepare a Supplemental Environmental Impact Statement (SEIS), pursuant to the National Environmental Policy Act (NEPA), to evaluate potential changes to the Water Control Manuals (WCMs) for three reservoirs in the Alabama-Coosa-Tallapoosa (ACT) River Basin and to the Master WCM for the ACT River Basin. The Draft SEIS will be prepared as an integrated document with the reallocation study. The USACE will hold five public scoping meetings during the months of July and August as part of its preparation to conduct the water supply storage reallocation study and update the WCMs for the Alabama Power Company's Weiss and Logan Martin reservoirs in the ACT River Basin.

DATES: The meeting dates and times are: 1. Monday, July 30, 2018, 4–8 p.m.

(EDT), Acworth, GA.

2. Tuesday, July 31, 2018, 4–8 p.m. (EDT), Rome, GA.

3. Wednesday, August 1, 2018, 4–8 p.m. (CDT), Gadsden, AL.

- 4. Thursday, August 2, 2018, 4–8 p.m. (CDT), Childersburg, AL.
- 5. Friday, August 3, 2018, 4–8 p.m. (CDT), Montgomery, AL.

ADDRESSES: The meeting locations are: 1. Acworth, GA—Cauble Park Beach

House, 4425 Beach Street, Acworth, Georgia 30101, (770) 917–1234.

2. Rome, GA—Forum River Civic Center, Berry/Shorter Room, 301 Tribune Street, Rome, Georgia 30161, (706) 291–5281.

3. Gadsden, AL—The Pitman Theater, 629 Broad St., Gadsden, Alabama 35901, (256) 549–4740.

4. Childersburg, AL—Friends on Eighth, 109 8th Ave. SW, Childersburg, Alabama 35044, (205) 296–2397.

5. Montgomery, AL—AUM Center for Lifelong Learning, 75 TechnaCenter

Drive, Montgomery, AL 36117, (334) 244–3343.

Following the scoping meetings, individuals who have not already submitted their comments should submit them by August 15, 2018, by either:

* Email to act-arc@usace.army.mil, or

* Mail to Mr. Mike Malsom, Inland Environment Team, Environment and Resources Branch, Planning and Environmental Division, USACE-Mobile, Post Office Box 2288, Mobile, AL 36628–0001.

FOR FURTHER INFORMATION CONTACT:

Direct questions about the NEPA process to Mr. Mike Malsom by mail at Inland Environment Team, Environment and Resources Branch, Planning and Environmental Division, USACE-Mobile, Post Office Box 2288, Mobile, AL 36628–0001; telephone at (251) 690– 2023; electronic facsimile at (251) 694– 3815; or email at ACT-ACR@ usace.army.mil. You can also request to be added to the mailing list for public distribution of notices, meeting announcements, and documents.

SUPPLEMENTARY INFORMATION:

Additional information on the ACT River Basin study will be posted as it becomes available on the Mobile District website at *http://*

www.sam.usace.army.mil/.

The USACE will hold five public scoping meetings during the months of July and August as part of its preparation to conduct the water supply storage reallocation study and update the WCMs for the Alabama Power Company's Weiss and Logan Martin reservoirs in the ACT River Basin. The public is invited to attend the scoping meetings, which will provide information on the study process and afford interested parties the opportunity to submit to USACE input about their issues and concerns regarding that process. Each of the public scoping meetings will be presented in an open house format, allowing time for participants to review specific information and to provide comments either on forms available at the meeting or to a court reporter on-site at the meeting.

Curtis M. Flakes,

Chief, Planning and Environmental Division. [FR Doc. 2018–14975 Filed 7–12–18; 8:45 am] BILLING CODE 3720–58–P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Notice of Intent To Prepare Supplement II to the Final Environmental Impact Statement, Mississippi River and Tributaries (MR&T) Project, Mississippi River Mainline Levees and Channel Improvement

AGENCY: Army Corps of Engineers, DoD. **ACTION:** Notice of Intent.

SUMMARY: The U.S. Army Corps of Engineers ("USACE"), Memphis District, Vicksburg District, and the New Orleans District, is announcing its intent to prepare Supplement II (SEIS II) to the Final Environmental Impact Statement, Mississippi River and Tributaries (MR&T) Project, Mississippi River Mainline Levees and Channel Improvement of 1976 (1976 EIS), as updated and supplemented by Supplement No. 1, Mississippi River and Tributaries Project, Mississippi River Mainline Levee Enlargement and Seepage Control of 1998 (SEIS I) to the 1976 EIS, to cover construction of remaining authorized work on the Mississippi River mainline levees (MRL) feature. Over the past twenty years since the finalization of SEIS I, USACE has determined that various sections (reaches) of the mainline levee system are deficient in varying amounts, and that certain remedial measures need to be undertaken to control seepage and to raise and stabilize the deficient sections of the levee to protect the lower Mississippi River Valley against the Project Design Flood (PDF) and maintain the structural integrity of the MRL system. The Proposed Action of SEIS II is to supplement and, as necessary, augment the 1976 EIS and SEIS I using the primary MR&T goals of: (1) Providing flood protection from the PDF; and (2) developing an environmentally sustainable project; formulating alternatives; identifying significant resources; assessing the direct, indirect, and cumulative impacts to those resources; investigating and environmentally assessing potential borrow areas; developing mitigation measures; and evaluating and selecting a preferred method for the construction of necessary authorized MRL Project features, which may include but are not limited to, implementing seepage control measures and the construction of various remediation measures for deficient levee reaches to bring these reaches to the project design grade. SEIS II will evaluate the potential direct,

indirect, and cumulative impacts for an array of alternatives, including a No Action alternative.

FOR FURTHER INFORMATION CONTACT: Comments and questions about SEIS II should be submitted to USACE by email to: *MRL-EIS-2@usace.army.mil;* or by regular mail to: U.S. Army Corps of Engineers, ATTN: CEMVN–PDC–UDC, 167 North Main Street, Room B–202, Memphis, Tennessee 38103–1894. For additional information, including but not limited to a copy of SEIS I and the 1976 EIS, please visit the Project website at: *http://*

www.mvk.usace.army.mil/MRLSEIS/.

SUPPLEMENTARY INFORMATION:

1. Project Background and Authorization. The MR&T Project (and the MRL feature) was authorized by the Flood Control Act of 1928, as amended. The 1976 EIS was filed with the Council of Environmental Quality on 8 April 1976. SEIS I, which was prepared to supplement the 1976 EIS to evaluate the effects of continued construction of the MRL levee enlargements, stability berms, seepage control, and erosion protection measures, was filed with the **Environmental Protection Agency on 31** July 1998. SEIS I focused on the levees of the MRL that were the most deficient in height and on seepage control measures for levee reaches with observable signs of seepage during previous high water events.

The MR&T Project is designed to manage flood risk damages in the alluvial valley between Cape Girardeau, Missouri and the Head of Passes, Louisiana. The goal of the MR&T Project is to provide an environmentally sustainable project for comprehensive flood damage control, protection, and risk reduction from the "Project Design Flood", in the alluvial valley beginning at Cape Girardeau, Missouri to the Head of Passes, Louisiana, by means of levees, floodwalls, floodways, reservoirs, banks stabilization and channel improvements in and along the Mississippi River and its tributaries. The mainline levee system, comprised of levees, floodwalls, backwater areas, floodways, and various control structures, is approximately 1,610 miles long. The PDF is a hypothetical flood that was developed to determine the design flood to be used in designing the MR&T levee system in the lower Mississippi River Basin, and is defined as the "greatest flood having a reasonable probability of occurrence? when the operable features of the entire MR&T Project are considered. The PDF upon which the current design for the construction of the mainline levee system and remaining unconstructed levees is based, is the "Refined 1973



US Army Corps of Engineers ® Mobile District Public Scoping Meetings for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa (ACT) River Basin



HOTO CREDITS: TETRATECH - CHILDERS JAMIE

July 2018

SACE wants your input on a water supply reallocation study and a flood storage analysis in the ACT River Basin.

Public scoping meetings (open house format) will be held by the U.S. Army Corps of Engineers (USACE), Mobile District. USACE is initiating a study to evaluate an increased allocation of storage to water supply at Allatoona Lake and potential flood operation changes for two Alabama Power Company (APC) reservoir projects, Weiss Dam and Lake and the Logan Martin Dam and Lake, in the ACT River Basin. The water supply study is part of USACE's evaluation of a March 30, 2018 request by the State of Georgia for a water supply storage reallocation. The flood storage analysis will evaluate APC's proposal to raise the winter water level and, at the same time, lower the upper limit of flood storage at the Weiss and Logan Martin projects that USACE has navigation and flood risk management oversight. USACE intends to prepare a supplemental environmental impact statement (SEIS) on these potential changes to the Water Control Manuals (WCM) for the three projects and to the overall Master WCM for the basin. The SEIS will be prepared as an integrated decision document capturing the analysis of the projects and the environmental impacts associated with the proposed federal action, pursuant to the National Environmental Policy Act.

Background. The water resources of the ACT River Basin serve several purposes, from northwest Georgia downstream through central Alabama and into Mobile Bay, over a distance of about 320 miles and encompassing an area of about 22,800 square miles. Eighteen major dams (six federal and twelve non-federal) are located on the mainstem rivers throughout the ACT River Basin.

Under Section 7 of the Flood Control Act of 1944, USACE operates projects in the basin in accordance with water control plans and manuals for their authorized purposes and non-federal projects that contain navigation and/or flood control (flood risk management). WCMs provide guidance to water managers in operating reservoirs. WCMs provide detailed information on managing the reservoirs under normal and extreme conditions (flood and drought), including ensuring dam safety during extreme conditions.

In May 2015, USACE completed an update to the Master WCM for the ACT River Basin but deferred WCM updates for the two APC reservoir projects, Weiss and Logan Martin. At that time, USACE determined that additional study of flood risk and necessary flood easements was required before those updates could be completed. A pending request for additional water supply storage and changes to storage accounting practices at Allatoona Lake was also not included.

In January 2018, the U.S. District Court for the Northern District of Georgia issued a judgment in Georgia et al. v. U.S. Army Corps of Engineers, No. 14-cv-03593 (Jan. 9, 2018). The judgement held that USACE had unreasonably delayed action on Georgia's water supply request and directed USACE to take final action by responding to that request by March 2021. The State of Georgia submitted an updated request to USACE on March 30, 2018. USACE intends to evaluate actions necessary to respond to Georgia's request, as well as one or more reasonable alternatives, in the integrated SEIS.

Specific questions may be directed to:Mr. Mike Malsom, Environment and Resources Branch, Planning and Environmental DivisionU.S. Army Corps of Engineers, Post Office Box 2288, Mobile, AL 36628-0001Telephone (251) 690-2023Fax: (251) 694-3815

Tetra Tech, Inc. 700 N. St. Mary's Street, Suite 300 San Antonio, TX 78205



Open House Public Scoping Meetings for water supply reallocation and flood storage studies Public Scoping Meetings will be held at the following locations and times:

GEORGIA

Monday, July 30, 2018 4:00 - 8:00 pm Eastern time Cauble Park Beach House (Acworth Beach) 4425 Beach Street Acworth, GA 30101 (770) 917-1234 Tuesday, July 31, 2018 4:00 - 8:00 pm Eastern time Forum River Civic Center Berry/Shorter Room 301 Tribune Street Rome, GA 30161 (706) 291-5281

Wednesday, August 1, 2018 4:00 - 8:00 pm Central time The Pitman Theater 629 Broad Street Gadsden, AL 35901 (265) 549-4740

ALABAMA

Thursday, August 2, 2018 4:00 - 8:00 pm Central time Friends on Eighth 109 8th Avenue SW Childersburg, AL 35044 (205) 296-2397

Friday, August 3, 2018 4:00 - 8:00pm Central time AUM Center for Lifelong Learning 75 TechnaCenter Drive Montgomery, AL 36117 (334) 244-3804

Public Scoping Comments:

USACE invites all interested parties to submit comments on natural and human resources concerns, potential environmental effects, and potential measures that USACE should consider associated with this reallocation study, WCM updates, and Integrated SEIS. Comments can be submitted by the following methods:

- Onsite at the scoping meetings via comment cards or court reporter
- By email to ACT-ACR@usace.army.mil
- By letter addressed to Commander USACE, Mobile District, ATTN: PD-EI (ACT-ACR), P.O. Box 2288, Mobile, AL 36628-0001

Please submit all scoping comments by August 15, 2018.





US Army Corps of Engineers®

Mobile District









US Army Corps of Engineers BUILDING STRONG®

USACE announces public scoping meetings in the Alabama-Coosa-Tallapoosa (ACT) River Basin

Posted 7/13/2018

Release no. 18-046

Contact

Chuck Walker 251-690-3241

charles.r.walker@usace.army.mil

MOBILE, Alabama – The U.S. Army Corps of Engineers (USACE), Mobile District will host five public scoping meetings between July 30, 2018 and August 3, 2018 at locations throughout the Alabama-Coosa-Tallapoosa (ACT) River Basin.

The open-house meetings are intended to introduce the public to a study to evaluate an increased allocation of storage to water supply at Allatoona Lake and potential flÂood operation changes for two Alabama Power Company (APC) reservoir projects, Weiss Dam and Lake and the Logan Martin Dam and Lake.

In January 2018, the U.S. District Court for the Northern District of Georgia issued a judgment in Georgia et al. v. U.S. Army Corps of Engineers, No. 14-cv-03593 (Jan. 9, 2018). The judgment held that USACE had unreasonably delayed action on Georgiaâ€TMs water supply request and directed USACE to take final action responding to that request by March 2021. The state of Georgia submitted an updated request to USACE on March 30, 2018.

The flÂood storage analysis will evaluate APC's proposal to raise the winter water level and, at the same time, lower the upper limit of flÂood storage at the Weiss and Logan Martin projects where USACE has navigation and flÂood risk management oversight.

Pursuant to the National Environmental Policy Act, USACE intends to prepare a supplemental environmental impact statement (SEIS) on these potential changes to the Water Control Manuals (WCM) for the three projects and to the overall Master WCM for the basin. The SEIS will be prepared as an integrated decision document capturing an analysis of the effects and the environmental impacts associated with the proposed federal actions.

Public Scoping Meetings will be held at the following locations and times:

Monday, July 30, 2018

4:00 - 8:00 pm Eastern time
Cauble Park Beach House (Acworth Beach)
4425 Beach Street
Acworth, GA 30101
(770) 917-1234
Â
Tuesday, July 31, 2018
4:00 - 8:00 pm Eastern time
Forum River Civic Center
Berry/Shorter Room
301 Tribune Street
Rome, GA 30161
(706) 291-5281

Â

Wednesday, August 1, 2018

4:00 - 8:00 pm Central time The Pitman Theater 629 Broad Street

Gadsden, AL 35901

(265) 549-4740 Â **Thursday, August 2, 2018** 4:00 - 8:00 pm Central time

4:00 - 8:00 pm Central time Friends on Eighth 109 8th Avenue SW

Childersburg, AL 35044

(205) 296-2397 Â

Friday, August 3, 2018

4:00 - 8:00pm Central time AUM Center for Lifelong Learning 75 TechnaCenter Drive Montgomery AL 36117

Montgomery, AL 36117

(334) 244-3804

USACE invites all interested parties to submit comments on natural and human resources concerns, potential environmental effects, and potential measures that USACE should consider associated with this reallocation study, WCM updates, and Integrated SEIS. Comments can be submitted by the following methods: • Onsite at the scoping meetings via comment cards or court reporter • By email to ACT-ACR@usace.army.mil • By letter addressed to Commander USACE, Mobile District, ATTN: PD-EI (ACT-ACR), P.O. Box 2288, Mobile, AL 36628-0001 Please submit all scoping comments by August 15, 2018. More information is available online at http://www.sam.usace.army.mil/

APPENDIX B NATIVE AMERICAN INDIAN TRIBAL NOTIFICATION AND RESPONSE



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable George Blanchard, Governor Absentee-Shawnee Tribe Oklahoma 2025 South Gordon Cooper Drive Shawnee, Oklahoma 74801

Dear Governor Blanchard:

EPLY TO

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

The USACE, Mobile District intends to prepare an SEIS to evaluate potential changes to the Water Control Manuals (WCM) for three reservoirs in the ACT River Basin and to the Master WCM for the ACT River Basin. The USACE, Mobile District intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request from the Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the Integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release action of Federal water managers and will evaluate the associated environmental impacts of the proposed Federal action pursuant to the National Environmental Policy Act. The USACE, Mobile District also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin. The effects of the Tentatively Selected Plan will also be evaluated pursuant to the National Historic Preservation Act.

A copy of the NOI to Prepare a SEIS, as published in the Federal Register, on April 30, 2018, in Vol. 83, No. 83 is enclosed. That document includes supplemental information and the formal points of contact for the study.

Address	Date	Time
Cauble Park Beach House, 4425 Beach Street, Acworth, Georgia 30101 (770) 917-1234	July 30, 2018	4-8 pm (EDT)
Forum River Civic Center, Berry/Shorter Room, 301 Tribune Street, Rome, Georgia 30161 (706) 291-5281	July 31, 2018	4-8pm (EDT)
The Pitman Theater, 629 Broad St., Gadsden, Alabama 35901 (256) 549-4740	August 1, 2018	4-8pm (CDT)
Friends on Eighth, 109 8th Ave SW, Childersburg, Alabama 35044 (205) 296-2397	August 2, 2018	4-8pm (CDT)
AUM Center for Lifelong Learning, 75 TechnaCenter Drive, Montgomery, Alabama 36117 (334) 244-3343	August 3, 2018	4-8pm (CDT)

Under Executive Order 13175, the USACE, Mobile District also offers your Tribe the opportunipty of information sharing alternatives to the public scoping meetings. If you wish to participate in an alternate format or would like to request the information to be provided at the public scoping meetings please contact the Mobile District Tribal Liaison at SAM_TribalLiaison@usace.army.mil.

The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Erin Thompson, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sett P.

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



CORPS OF ENGINEERS, MOBILE DISTRICT

REPLY TO ATTENTION OF

P.O. BOX 2288 MOBILE, AL 36628-0001

DEPARTMENT OF THE ARMY

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Carlos Bullock, Chairperson Alabama-Coushatta Tribes of Texas 571 State Park Road 56 Livingston, Texas 77351

Dear Chairperson Bullock:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

The USACE, Mobile District intends to prepare an SEIS to evaluate potential changes to the Water Control Manuals (WCM) for three reservoirs in the ACT River Basin and to the Master WCM for the ACT River Basin. The USACE, Mobile District intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request from the Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the Integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release action of Federal water managers and will evaluate the associated environmental impacts of the proposed Federal action pursuant to the National Environmental Policy Act. The USACE, Mobile District also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin. The effects of the Tentatively Selected Plan will also be evaluated pursuant to the National Historic Preservation Act.

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Under Executive Order 13175, the USACE, Mobile District also offers your Tribe the opportunity of information sharing alternatives to the public scoping meetings. If you wish to participate in an alternate format or would like to request the information to be provided at the public scoping meetings please contact the Mobile District Tribal Liaison at SAM_TribalLiaison@usace.army.mil.

The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Bryant J. Celestine, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sut P.

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Nelson Harjo, Chief Alabama-Quassarte Tribal Town Post Office Box 187 Wetumpka, Oklahoma 74883

Dear Chief Harjo:

REPLY TO ATTENTION OF

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

The USACE, Mobile District intends to prepare an SEIS to evaluate potential changes to the Water Control Manuals (WCM) for three reservoirs in the ACT River Basin and to the Master WCM for the ACT River Basin. The USACE, Mobile District intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request from the Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the Integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release action of Federal water managers and will evaluate the associated environmental impacts of the proposed Federal action pursuant to the National Environmental Policy Act. The USACE, Mobile District also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin. The effects of the Tentatively Selected Plan will also be evaluated pursuant to the National Historic Preservation Act.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Samantha Robinson, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sut P. Tr

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



REPLY TO ATTENTION OF DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Tamara Francis-Fourkiller, Chairperson Caddo Nation, Oklahoma Post Office Box 487 Binger, Oklahoma 73009

Dear Chairperson Francis-Fourkiller:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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Under Executive Order 13175, the USACE, Mobile District also offers your Tribe the opportunity of information sharing alternatives to the public scoping meetings. If you wish to participate in an alternate format or would like to request the information to be provided at the public scoping meetings please contact the Mobile District Tribal Liaison at SAM_TribalLiaison@usace.army.mil.

The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Phil Cross, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander

-2-

Enclosures



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001

REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Bill Harris, Chief Catawba Indian Nation 996 Avenue of the Nations Rock Hill, South Carolina 29730

Dear Chief Harris:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Dr. Wenonah G. Haire, Executive Director. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sut P.

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001

REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Bill John Baker, Chief Cherokee Nation, Oklahoma Post Office Box 948 Tahlequah, Oklahoma 74465

Dear Chief Baker:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sur P. W

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001

REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Bill Anoatubby, Tribal Governor The Chickasaw Nation Post Office Box 1548 Ada, Oklahoma 74821-1548

Dear Tribal Governor Anoatubby:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Karen Brunso, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sut P. 7

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures



REPLY TO ATTENTION OF DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable John Paul Darden, Chairman Chitimacha Tribe, Louisiana Post Office Box 661 Charenton, Louisiana 70523

Dear Chairman Darden:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Kimberly Walden, Cultural Resources Director, NAGPRA Representative. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Gary Batton, Chief Choctaw Nation of Oklahoma Post Office Drawer 1210 Durant, Oklahoma 74701

Dear Chief Batton:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Dr. Ian Thompson, RPA Director, Historic Preservation Department. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sur P. 9

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable David Sickey, Tribal Chairman Coushatta Tribe of Louisiana Post Office Box 818 Elton, Louisiana 70532

Dear Tribal Chairman Sickey:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Linda Langley, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Richard Sneed, Principal Chief Eastern Band of the Cherokee Nation Post Office Box 455 Cherokee, North Carolina 28719

Dear Principal Chief Sneed:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Russell Townsend, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Glenna J. Wallace, Chief Eastern Shawnee Tribe of Oklahoma Post Office Box 350 Seneca, Missouri 64865

Dear Chief Wallace:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Brett Barnes, Cultural Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sur P. R

Sebastien P. Joly Colonel, U.S. Army District Commander



Inland Environment Team Planning and Environmental Division

Honorable Cheryl Smith, Chief Jena Band of Choctaw Indians, Louisiana Post Office Box 14 Jena, Louisiana 71342

Dear Chief Smith:

REPLY TO ATTENTION OF

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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AUM Center for Lifelong Learning, 75 TechnaCenter Drive, Montgomery, Alabama 36117 (334) 244-3343	August 3, 2018	4-8pm (CDT)

The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Alina Shively, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sur P.S

Sebastien P. Joly Colonel, U.S. Army District Commander



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, MOBILE DISTRICT P.O. BOX 2288 MOBILE, AL 36628-0001 JUL 2 0 2018

REPLY TO ATTENTION OF

Inland Environment Team Planning and Environmental Division

Honorable Jeremiah Hobia, Chief Kialegee Tribal Town, Oklahoma Post Office Box 332 Wetumpka, Oklahoma 74883

Dear Chief Hobia:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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A copy of the NOI to Prepare a SEIS, as published in the Federal Register, on April 30, 2018, in Vol. 83, No. 83 is enclosed. That document includes supplemental information and the formal points of contact for the study.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. David Cook, Tribal Adminstrator. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sur P. 9

Sebastien P. Joly Colonel, U.S. Army District Commander

Enclosures

.



Inland Environment Team

REPLY TO ATTENTION OF

Planning and Environmental Division

Honorable Billie Cypress, Chairman Miccosukee Tribe of Indians of Florida HC 61, SR Box 68, Old Loop Road Ochopee, Florida 34141

Dear Chairman Cypress:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Fred Dayhoff, NAGPRA and Section 106 Representative. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sur P. 9

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Beasley Denson, Chief Mississippi Band of Choctaw Indians 101 Industrial Road Philadelphia, Mississippi 39350

Dear Chief Denson:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Kenneth H. Carleton, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

sur P. 9

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable James Floyd, Principal Chief Muscogee (Creek) Nation Post Office Box 580 Highway 75 at Loop 56 Okmulgee, Oklahoma 74447

Dear Principal Chief Floyd:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Corain Lowe-Zepeda, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

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Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Stephanie A. Bryan, Tribal Chair Poarch Band of Creek Indians 5811 Jack Springs Road Atmore, Alabama 36502

Dear Tribal Chair Bryan:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Carolyn M. White, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



Inland Environment Team Planning and Environmental Division

Honorable John Berrey, Chairman Quapaw Tribe of Indians, Oklahoma Post Office Box 765 Quapaw, Oklahoma 74363-0765

Dear Chairman Berrey:

REPLY TO

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Everett Bandy, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



ATTENTION OF

REPLY TO

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Ron Sparkman, Chairman Shawnee Tribe, Oklahoma Post Office Box 189 Miami, Oklahoma 74355

Dear Chairman Sparkman:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Tonya Tipton, Tribal Hisotirc Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

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Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Greg Chilcoat, Chief Seminole Nation of Oklahoma Post Office Box 1498 Wewoka, Oklahoma 74884

Dear Chief Chilcoat:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Thedore Isham, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sur P.

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Marcellus W. Osceola, Chairman Seminole Tribe of Florida 30290 Josie Billie Highway PMB 1004 Clewiston, Florida 33440

Dear Chairman Osceola:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Dr. Paul Backhouse, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

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Sebastien P. Joly Colonel, U.S. Army District Commander

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DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, MOBILE DISTRICT

P.O. BOX 2288 MOBILE, AL 36628-0001

REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable Ryan Morrow, Town King Thlopthlocco Tribal Town Post Office Box 188 Okemah, Oklahoma 74859

Dear Town King Morrow:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Terry Clouthier, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

Inland Environment Team Planning and Environmental Division

Honorable Earl Barbry, Sr., Chairman Tunica-Biloxi Indian Tribe of Louisiana Post Office Box 1589 Marksville, Louisiana 71351

Dear Chairman Barbry, Sr.:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

The USACE, Mobile District intends to prepare an SEIS to evaluate potential changes to the Water Control Manuals (WCM) for three reservoirs in the ACT River Basin and to the Master WCM for the ACT River Basin. The USACE, Mobile District intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request from the Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the Integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release action of Federal water managers and will evaluate the associated environmental impacts of the proposed Federal action pursuant to the National Environmental Policy Act. The USACE, Mobile District also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin. The effects of the Tentatively Selected Plan will also be evaluated pursuant to the National Historic Preservation Act.

A copy of the NOI to Prepare a SEIS, as published in the Federal Register, on April 30, 2018, in Vol. 83, No. 83 is enclosed. That document includes supplemental information and the formal points of contact for the study.

Address	Date	Time
Cauble Park Beach House, 4425 Beach Street, Acworth, Georgia 30101 (770) 917-1234	July 30, 2018	4-8 pm (EDT)
Forum River Civic Center, Berry/Shorter Room, 301 Tribune Street, Rome, Georgia 30161 (706) 291-5281	July 31, 2018	4-8pm (EDT)
The Pitman Theater, 629 Broad St., Gadsden, Alabama 35901 (256) 549-4740	August 1, 2018	4-8pm (CDT)
Friends on Eighth, 109 8th Ave SW, Childersburg, Alabama 35044 (205) 296-2397	August 2, 2018	4-8pm (CDT)
AUM Center for Lifelong Learning, 75 TechnaCenter Drive, Montgomery, Alabama 36117 (334) 244-3343	August 3, 2018	4-8pm (CDT)

The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Mr. Earl J. Barbry, Jr., Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

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Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable George C. Wickliffe, Chief United Keetoowah Band of Cherokee Indians in Oklahoma Post Office Box 746 Tahlequah, Oklahoma 74465

Dear Chief Wickliffe:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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The USACE looks forward to consulting with your Tribe through the life of this study. I am forwarding a copy of this letter to Ms. Karen Pritchett, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

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Sebastien P. Joly Colonel, U.S. Army District Commander



REPLY TO ATTENTION OF

JUL 2 0 2018

Inland Environment Team Planning and Environmental Division

Honorable George C. Wickliffe, Chief United Keetoowah Band of Cherokee Indians in Oklahoma Attention: Ms. Karen Pritchett Tribal Historic Preservation Officer Post Office Box 746 Tahleguah, Oklahoma 74465

Dear Chief Wickliffe:

In the spirit of communication early and often, the U.S. Army Corps of Engineers (USACE), Mobile District is providing you Notice of the Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for portions of the Alabama-Coosa-Tallapoosa (ACT) River Basin. At this time, the SEIS study is in its infancy but is anticipated to be completed in May 2021. The USACE, Mobile District will be in consultation with your Tribe throughout the process of developing the SEIS.

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Under Executive Order 13175, the USACE, Mobile District also offers your Tribe the opportunity to participate in an alternate format to the public scoping meetings. If you wish to participate in that format or would like to request the information to be provided at the public scoping meetings please contact the Mobile District Tribal Liaison at SAM_TribalLiaison@usace.army.mil.

The USACE looks forward to consulting with your Tribe through the life of this study. I am are forwarding a copy of this letter to Ms. Karen Pritchett, Tribal Historic Preservation Officer. If you have any questions about the study, please do not hesitate to contact the formal POCs identified in the Public Notice or the Mobile District Tribal Liaison.

Sincerely,

Sebastien P. Joly Colonel, U.S. Army District Commander PD-EI/Bulger PD-EI/Wilián PD-EI/Winter PD-EI/Malsom PD-E/Jacobson OPi OC/Givhan PD-FP/White PD-FP/White PD-D/Campbell PD/Flakes DE-D/Mullins DE-D/McCarron DE/Joly

Enclosures



Average Burden per Response: 30 minutes.

Annual Burden Hours: 246,000.

Needs and Uses: The information collection requirement is necessary to obtain PII information which is used by in-country U.S. Embassy approvers to grant country travel clearances, Geographical Combatant Commands approvers to grant theater travel clearances and by the Office of Secretary of Defense for Policy approvers to grant special area travel clearances. Aircrew PII information is used for verification, identification and authentication of travelers for aircraft and personnel travel clearances, as required by DoDD 4500.54E, DoD Foreign Clearance Program,

Affected Public: Individuals or households.

Frequency: On occasion.

Respondent's Obligation: Voluntary. OMB Desk Officer: Ms. Jasmeet Seehra.

You may also submit comments and recommendations, identified by Docket ID number and title, by the following method:

• Federal eRulemaking Portal: http:// www.regulations.gov. Follow the instructions for submitting comments.

Instructions: All submissions received must include the agency name, Docket ID number, and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at http:// www.regulations.gov as they are received without change, including any personal identifiers or contact information.

DOD Clearance Officer: Mr. Frederick Licari.

Written requests for copies of the information collection proposal should be sent to Mr. Licari at whs.mcalex.esd.mbx.dd-dod-informationcollections@mail.mil.

Dated: April 25, 2018.

Shelly E. Finke,

Alternate OSD Federal Register Liaison Officer, Department of Defense. [FR Doc. 2018–09009 Filed 4–27–18; 8:45 am] BILLING CODE P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Intent To Prepare Draft Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project Water Control Manuals in the Alabama-Coosa-Tallapoosa River Basin

AGENCY: U.S. Army Corps of Engineers, DoD.

ACTION: Notice of intent.

SUMMARY: The U.S. Army Corps of Engineers (USACE), Mobile District, intends to prepare a Supplemental Environmental Impact Statement (SEIS) to evaluate potential changes to the Water Control Manuals (WCMs) for three reservoirs in the Alabama-Coosa-Tallapoosa (ACT) River Basin and to the Master WCM for the ACT River Basin. The USACE intends to conduct a water supply storage reallocation study to evaluate a March 30, 2018 request by Georgia and Cobb County-Marietta Water Authority (CCMWA) for increased water supply usage at Allatoona Lake and changed storage accounting methodology. The Draft SEIS will be prepared as an integrated document with the reallocation study. The reallocation study with the integrated Draft SEIS will address the water supply storage request and updated operating criteria and guidelines for managing the water storage and release actions of Federal water managers and will evaluate the associated environmental impacts of the proposed federal action, pursuant to the National Environmental Policy Act (NEPA). The USACE also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River Basin.

ADDRESSES: Environment and Resources Branch, Planning and Environmental Division, U.S. Army Engineer District-Mobile, Post Office Box 2288, Mobile, AL 36628–0001.

FOR FURTHER INFORMATION CONTACT: Questions about the NEPA process should be directed to: Mr. Mike Malsom, Inland Environment Team, Environment and Resources Branch, Planning and Environmental Division, U.S. Army Engineer District-Mobile, Post Office Box 2288, Mobile, AL 36628–0001; Telephone (251) 690–2023; delivered by electronic facsimile at (251) 694–3815; or by electronic mail: ACT-ACR@usace.army.mil. You may also request to be included on the mailing list for public distribution of notices, meeting announcements and documents.

SUPPLEMENTARY INFORMATION:

Background. Eighteen major dams (six Federal and twelve non-Federal), which form sixteen reservoirs, are located in the ACT River Basin. The ACT River Basin provides water resources for multiple purposes from northwestern Georgia down through central Alabama and to the Gulf Coast at the mouth of Mobile Bay, extending a distance of approximately 320 miles and encompassing an area of approximately 22,800 square miles. Pursuant to Section 7 of the Flood Control Act of 1944, the USACE prescribes regulations for the operation of its projects in the ACT River Basin for their authorized purposes, and for the non-federal projects that contain storage for the purposes of navigation or flood control (flood risk management), through water control plans and manuals.

In May 2015, the USACE completed a long-term effort to update the Master WCM for the ACT River Basin, including updated WCMs for all five USACE projects (Allatoona Dam and Lake, Carters Dam and Lake, Robert F. Henry Lock and Dam, Millers Ferry Lock and Dam and Claiborne Lock and Dam) and two of four Alabama Power Company (APC) projects with navigation or flood control storage (H. Neely Henry Dam and Lake and R.L. Harris Dam and Lake). WCMs for the other two APC projects with navigation and flood control storage, Logan Martin Dam and Lake (Reservoir) and Weiss Dam and Lake (Reservoir), were not updated at that time. A pending request by the State of Georgia for additional water supply storage and changes to storage accounting practices at Allatoona Lake was also not included within the scope of the 2015 WCM update and EIS.

In January 2018, the U.S. District Court for the Northern District of Georgia issued a judgment in Georgia et al. v. U.S. Army Corps of Engineers, No. 14-cv-03593 (Jan. 9, 2018), holding that the USACE had unreasonably delayed action on Georgia's water supply request, and directing the USACE to take final action responding to that request by March 1, 2021. Following that court decision, the State of Georgia and CCMWA submitted an updated request to the USACE on March 30, 2018, and the USACE intends to evaluate actions necessary to respond to Georgia's request, as well as one or more reasonable alternatives, in the proposed SEIS.

The USACE did not include updates to the WCMs for the Weiss and Logan Martin Reservoirs in the 2015 ACT River Basin Master WCM because further study of flood risk management issues at both projects was required. The USACE intends to update the WCMs for two APC reservoir projects in the ACT River Basin, including evaluation of APC's proposal to raise the winter level for recreation and at the same time to lower the upper limit of the induced surcharge operation at the Weiss Dam and Lake (Reservoir) and the Logan Martin Dam and Lake (Reservoir). These projects will be evaluated for flood impacts, Current Water Control Plans for the Weiss and Logan Martin Reservoirs, originally issued in the 1960s, contain surcharge curves with elevations higher than the respective flood easements acquired by APC. The easement at the Weiss Reservoir is 572 feet mean sea level (msl) and the surcharge curve indicates flood control storage to 574 feet msl. At the Logan Martin Reservoir, the easement elevation is 473.5 feet msl and the surcharge curve indicates flood control storage to 477 feet msl. Due to the flood risk management operational responsibilities of the USACE, the APC proposals would be evaluated along with other alternatives in the FR/SEIS and those manuals may be updated.

Because the USACE is simultaneously considering proposals to modify operations and update WCMs at three different ACT River Basin projects, the USACE intends to evaluate the effects of these proposals through a single EIS, which would supplement the Final EIS for the ACT River Basin completed in May 2015. As part of this analysis, the USACE will consider the effects of the proposed changes on operations of the ACT system of projects for all purposes, and would revise the ACT Master WCM to incorporate the updated Allatoona Lake, Weiss Reservoir, and Logan Martin Reservoir WCMs and to reflect changes, if any, in overall system operations.

WCMs are guidance documents that assist Federal water managers in the operation of individual and multiple interdependent Federal reservoirs on the same river system. The manuals provide technical, historical, hydrological, geographic, demographic, policy and other information that guide the proper management of reservoirs during times of high water, low water, and normal conditions. The manuals also contain drought plans and zones to assist Federal water managers in knowing when to reduce or increase reservoir releases, and how to ensure the safety of dams during extreme

conditions. The authority and guidance for the USACE to prepare and update these manuals may be found, inter alia, in Section 7 of the 1944 Flood Control Act, the Federal Power Act, Section 9 of Public Law 436–83, and the following USACE Engineering Regulations (ER): ER 1110–2–240, ER 1110–2–241, ER 1110–2–1941 and ER 1110–2–8156.

The evaluations of the proposed water supply storage reallocation at the Allatoona Lake and the flood impacts at several APC projects in the Coosa Basin may require updates to the current WCMs. The updated WCMs would be provided as appendices to the SEIS. Public participation throughout the

water supply storage reallocation and flood pool evaluation process is essential. The USACE invites full public participation at all stages to promote open communication and better decision making. All persons, stakeholders, and organizations that have an interest in water-related resources in the ACT Basin, including minority, low-income, disadvantaged and Native American groups, are urged to participate in this NEPA analysis process. Assistance will be provided upon request to anyone having difficulty understanding how to participate. Dates and locations for public scoping meetings will be announced by future publication in the Federal Register and in the local news media. Tentative dates for publication of the Draft SEIS and other opportunities for public involvement will also be announced at that time. Public comments are welcomed at any time throughout the NEPA process.

Cooperating Agencies. The lead responsibility for this action rests with the USACE. USACE intends to coordinate and/or consult with an interagency team of Federal and State agencies during scoping and preparation of the FR/SEIS. A decision will be made during the scoping process whether other agencies will serve in an official role as cooperating agencies.

Scoping. The 2015 ACT WCM update involved the States (Alabama and Georgia), stakeholders, and the public, in identifying areas of concern; collecting and developing water resources, environmental, and socioeconomic data; and developing tools to assist in decisions affecting water resources within the Basin. Scoping for this SEIS will continue to build upon the knowledge and information developed during the previous EIS process. Scoping meetings with agencies and stakeholder groups will be scheduled to identify any significant issues and data gaps, focus on the alternatives to be evaluated, and

to identify any appropriate updated tools to assist in the evaluation of alternatives and analysis of impacts.

Curtis M. Flakes,

Chief, Planning and Environmental Division. [FR Doc. 2018–09031 Filed 4–27–18; 8:45 am] BILLING CODE 3720–58–P

DEPARTMENT OF DEFENSE

Department of the Navy

[Docket ID USN-2018-HQ-0007]

Proposed Collection; Comment Request

AGENCY: Department of the Navy, DoD. **ACTION:** Information collection notice.

SUMMARY: In compliance with the Paperwork Reduction Act of 1995, the Department of the Navy announces a proposed public information collection and seeks public comment on the provisions thereof. Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed information collection; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the information collection on respondents, including through the use of automated collection techniques or other forms of information technology.

DATES: Consideration will be given to all comments received by June 29, 2018.

ADDRESSES: You may submit comments, identified by docket number and title, by any of the following methods:

Federal eRulemaking Portal: http:// www.regulations.gov. Follow the instructions for submitting comments.

Mail: Department of Defense, Office of the Chief Management Officer, Directorate for Oversight and Compliance, 4800 Mark Center Drive, Mailbox #24 Suite 08D09, Alexandria, VA 22350–1700.

Instructions: All submissions received must include the agency name, docket number, and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at http:// www.regulations.gov as they are received without change, including any personal identifiers or contact information.

QUAPAW TRIBE OF OKLAHOMA

P.O. Box 765 Quapaw, OK 74363-0765 (918) 542-1853 FAX (918) 542-4694

August 6, 2018

Department of the Army Corps of Engineers, Mobile District Attn: Inland Environmental Team Planning And Environmental Division P.O. Box 2288 Mobile, AL 36628-0001

Re: USACE, providing a NOI to prepare a SEIS

To Whom It May Concern:

This project is outside of the current area of interest for the Quapaw Tribe; therefore, the Quapaw Tribe does not desire to comment on this project at this time. Thank you for your efforts to consult with us on this matter.

Sincerely,

Everett Bandy

Everett Bandy, THPO Quapaw Tribe of Oklahoma P.O. Box 765 Quapaw, OK 74363 (p) 918-238-3100

APPENDIX C INTERAGENCY WEB CONFERENCE

Malsom, Michael F CIV USARMY CESAM (US)

From: Sent: To: Malsom, Michael F CIV USARMY CESAM (US) Tuesday, July 03, 2018 1:46 PM

Cc:Jacobson, Jennifer L CIV USARMY CESAM (US); White, Jonas CIV USARMY CESAM (US);
Ladart, Meredith H CIV USARMY CESAM (US)Subject:Scoping Interagency Meeting for the Draft SEIS for the Allatoona Lake Water Supply Storage
Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project WCMs in the
ACT River BasinAttachments:Federal Register - 30 April 2018 - NOI to Prepare DSEIS for Allatoona Lake WS Storage
Reallocation Study & Update to Weiss & Logan Martin in ACT.pdf

Subject: Scoping Interagency Meeting for the Draft SEIS for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoir Project WCMs in the ACT River Basin

To all -

The U.S. Army Corps of Engineers, Mobile District (USACE) will host an interagency scoping meeting on Thursday, July 12, 2018 from 9 am to 12 am (Central Time). The meeting will be held at the USACE, Mobile District's downtown office (109 St. Joseph Street, Mobile, Alabama) in the Planning & Environmental Division Conference Room (3000B) on the third floor. You will have to go through our security and call me at 251-690-2023 or Ms. Elba Milian-Canales at 251-694-4106 to be escorted to the conference room. Your agency's participation is requested at this meeting but should you not be able to attend in-person, a webinar is available to join the meeting. I ask that you let me know if you plan to participate in person or by webinar prior to July 12th.

At this interagency scoping meeting, the USACE, Mobile District will discuss its intends to prepare a Supplemental Environmental Impact Statement (SEIS) to evaluate potential changes to the Water Control Manuals (WCMs) for three reservoirs in the Alabama-Coosa- Tallapoosa (ACT) River Basin and to the Master WCM for the ACT River Basin. The USACE intends to conduct a water supply storage reallocation study to evaluate increased water supply usage by the Georgia and Cobb County-Marietta Water Authority (CCMWA) from Allatoona Lake. At the time the Master WCM was finalized in 2015, WCMs for the two Alabama Power Company projects with navigation and flood control storage, Logan Martin and Weiss Reservoir, were not prepared. Those WCMs were to be prepared at a later date. The USACE, Mobile District also intends to update the WCMs for the Alabama Power Company's Weiss and Logan Martin Reservoirs in the ACT River. Additional details are included in the attached Notice of Intent (NOI) published in the Federal Register on 30 April 2018.

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WEBINAR INFORMATION: Toll free: 1-877-336-1274 Caller paid: (404) 443-6386 Access code:

Security code:

Webmeeting:

https://usace.webex.com/meet/ Access Code:

The USACE, Mobile District also requests your participation at one or all of its five public scoping meetings to be held during the months of July and August. The dates, venue locations, and times are included below.

PUBLIC SCOPING MEETINGS:

DATES: The meeting dates and times are:

1. Monday, July 30, 2018, 4–8 p.m. (EDT), Acworth, GA.

2. Tuesday, July 31, 2018, 4-8 p.m. (EDT), Rome, GA.

3. Wednesday, August 1, 2018, 4–8 p.m. (CDT), Gadsden, AL.

4. Thursday, August 2, 2018, 4–8 p.m. (CDT), Childersburg, AL.

5. Friday, August 3, 2018, 4-8 p.m. (CDT), Montgomery, AL.

ADDRESSES: The meeting locations are:

1. Acworth, GA - Cauble Park Beach House, 4425 Beach Street, Acworth, Georgia 30101, (770) 917-1234.

2. Rome, GA – Forum River Civic Center, Berry/Shorter Room, 301 Tribune Street, Rome, Georgia 30161, (706) 291-5281.

.3. Gadsden, AL – The Pitman Theater, 629 Broad St, Gadsden, Alabama 35901, (256) 549-4740.

4. Childersburg, AL – Friends on Eighth, 109 8th Ave SW, Childersburg, Alabama 35044, (205) 296-2397.

5. Montgomery, AL - AUM Center for Lifelong Learning, 75 TechnaCenter Drive, Montgomery, AL. 36117, (334) 244-3343.

Michael F. Malsom Inland Team Lead Planning Division U.S. Army Corps of Engineers, Mobile District Office:(251) 690-2023 Email: michael.f.malsom@usace.army.mil

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Memorandum for Record

Subject: Interagency Scoping Meeting for Allatoona-Coosa Reallocation (ACR) Study

Date: July 12, 2018, Time: 9:00 a.m.CT-11:00 a.m.CT

Location: USACE Mobile District Office, Planning Division Conference Room

Attendees

In pers	son:	On conference call:
•	Gail Cowie, GAEPD	Chris Johnson, ADEM
•	Brian Atkins, ADECA	Kimberly Minton ADEM
•	Micah Wiggins, Corps	Dow Johnson, AL OWR
•	Leo Cromartie, Corps	Herb Nadler, SEPA
•	Mike Creswell, Corps	Dixie Cordell, SEPA
•	Chuck Walker, Corps	J.W. Smith, SEPA
•	Mike Malson, Corps	Leon Jerolman, SEPA
•	Jenny Jacobsen, Corps	Wayne King, FERC
•	Meredith Ladart, Corps	John Burgess, FERC
•	Alex Smith, Corps	Jamie Childers, Tetra Tech

- Jonas White, Corps
- James Hathorn, Corps
- Kris Mullins, Corps
- Memphis Vaughan, Tetra Tech

The meeting began with a welcome from Kris Mullins, Chief of Staff at the Corps and introductions by all the attendees in person and on the phone. A PowerPoint presentation was prepared showing the posters that would be presented at the series of Open House Public Scoping Meetings to be held July 30 to August 3 in five cities: Acworth, GA: Rome, GA; Gadsden, AL; Childersburg, AL; and Montgomery, AL. The presentation was also made available to the participants on the phone via web meeting.

Ms. Mullins gave an overview of the project purposes and uses of the river system beginning upstream and working downstream. She described what was not done in the previous Master Water Control Manual update. She stated that the State of Georgia's water request was not considered in that effort. At that time and currently, the Corps is establishing a policy for handling water supply returns in storage accounting The Water Control Manuals (WCM) for Weiss and Logan Martin projects were also not included because Alabama Power Company (APC) was going through their FERC relicensing process for those two projects and APC had not purchased flood easements. APC didn't want to let that process derail the other efforts to update the WCM manuals for their other Alabama River projects.

The Allatoona Reallocation effort and the update of the APC manuals were expected to be two separate efforts but given the timing, they will be combined into one effort. The overall scope is to update the manuals, perform a reallocation study at Allatoona Lake and will consider changes to flood operations and consider raising the winter pool at the APC projects. It is expected to have one NEPA document, one project delivery team and one study document. However, the results could be very individual to the particular projects.

As Ms. Mullins described the basin, its purposes and background on how Corps became involved with APC projects, there was clarification made about the status of navigation on the Coosa River portion of the system. It was confirmed that navigation from Montgomery to Rome had been de-authorized by Congress years ago on the Coosa River.

Discussion returned to the proposed water supply rule and what its effects on storage accounting. Since it is handled as a national policy, a change to the storage accounting won't be considered specifically for this effort. Mike Creswell stated that the Corps isn't sure what national change will occur given the current administration and how the final rule would affect it.

The Corps stated that they will model Georgia's request using their storage accounting method as well as model it with the current Corps method.

Brian Atkins of ADECA stated that the goal of modeling the storage is to be more explicit with the storage accounting. He also asked about whether the Corps could address all the alternatives that they have initially identified and would some of them be taken off the table. Ms. Mullins stated that we will carry them through full analysis. At the end, it would be a matter of determining whether the Corps can meet or grant those requests.

Gail Cowie of GAEPD asked whether the Corps would carry them forward if APC meet their commitments to provide modeling results for their requests. Ms. Mullins stated that they have agreed to do the work and provide the Corps with the results. Their alternatives would be evaluated alongside the other Corps alternatives.

Meredith Ladart discussed the Plan Formulation process and the SMART process and how the two work together and what some of the common milestones are for each process.

Mr. Hathorn discussed the Indian Creek Reservoir and the Russell Creek Reservoir. He stated that there will be some discussion of the impacts of those reservoirs within the SEIS. These two reservoirs are in the permitting process with the USACE Savannah District.

Mr. Hathorn walked the group through the slide displaying how induced surcharge works.

A question was raised about how often induced surcharge occurs at APC projects and James Hathorn stated that it occurs about very two years. He stated that there is a tainter gate that allows you to keep water in the reservoir. Limited flood storage is gained by inducing additional space – gates are raised

and pool is allowed to rise but to do that you have to release water; water is released at a slower rate. The top of induced surcharge operation occurs when the tainter gate is fully opened.

The green line equals current operation - revise operation so it coincides with the easement. Another part is to raise winter level consistent with requests of home owners. The result is you have to increase the releases. You'll have higher releases from these projects and the study will evaluate the impact of these higher releases.

The orange line is the pool elevation (assumes higher flood elevation if USACE allows to operate at a lower flood easement.

Blue dash line is the proposal (more water sooner, more water, more often) – how often the induced surcharge operation will kick-in.

It was shared that the evaluation of the State of Georgia's request may require updating the water control manuals if significant changes occur.

Mr. Atkins asked about the proposed new Georgia reservoirs and Ms. Cowie responded with a description of the current plan shifting from five reservoirs to the current plan.

Mr. Atkins asked about water quality and Mr. Hathorn stated that the Corps will use HEC-5Q to evaluate impacts. Comments from Alabama addressed water quality modeling and whether any consideration would be given to comments from EPA, ADEM and the use of TMDL models. The Corps responded saying that it is something being considered and if other agencies want to run their own models, their results will be fully considered.

It was also suggested that climate change impacts we looked at using the with- and without-project conditions. Ms. Ladart indicated that an apples to apples comparison will be made.

Another suggestion was made to consider other new reservoirs as a least costly alternative.

In conclusion, the location and times of the public scoping meetings were discussed and all agencies were invited to attend the location that was most convenient for them.

APPENDIX D PUBLIC SCOPING MEETING MATERIALS

The U.S. Army Corps of Engineers (USACE) is currently SCOPING to obtain feedback on (1) reallocation of water storage at Allatoona Lake for water supply and (2) Water Control Manual (WCM) Updates for the Weiss and Logan Martin Reservoir Projects for flood risk management. Efforts will be combined into an integrated report and Supplemental Environment Impact Statement (SEIS).

Comments will be collected through August 15, 2018 for consideration in the next phase of the study process.

STEP 1: Please sign in at the information table **STEP 2:** Visit displays placed around the room in any order to learn more **STEP 3:** Provide comments on the Allatoona Lake water supply storage reallocation study and the updates to the Weiss and Logan Martin reservoir project WCMs by one of the following means: Submit comments on comment forms. Provide input on posters where specified. Provide verbal comments at the court reporter station. Email comments to ACT-ACR@usace.army.mil. Mail comments to the USACE Mobile District Commander.



terminates where it meets the Etowah River (flowing in from the left at the top of the photo).







Purpose:

- changes in operations

Need:

- and flood operations
- **Company Projects**

Purpose and Need

Evaluate the 2018 water supply request from the State of Georgia seeking to reallocate water storage out of Allatoona Lake Evaluate proposed revised operations at two Alabama Power Company (APC) projects: Weiss and Logan Martin projects Update any Water Control Manuals (WCMs), as necessary, as a result of

Respond to the State of Georgia's request for water supply by March 1, 2021 pursuant to the Northern District of Georgia's January 9, 2018 Order Produce a Feasibility Report* with an Integrated Supplemental Environmental Impact Statement (SEIS) addressing water supply storage

Produce updated project water control manuals as required by regulation Produce an updated Memorandum of Agreement for Alabama Power

* Though not required to meet all requirements of a cost-shared feasibility study, this study utilizes aspects of the SMART Planning Feasibility Study









What Are Water Control Manuals?

The operations at each federal reservoir managed by the U.S. Army Corps of Engineers (USACE) are described in water control manuals (WCMs). These manuals outline regulation schedules for each project (including operating criteria, guidelines and guide curves for varying conditions) and specifications for storage and releases from the reservoirs. USACE approved the current Master WCM and individual WCMs for the Alabama-Coosa-Tallapoosa (ACT) River Basin, except Weiss and Logan Martin, in May 2015.

Why Are Water Control Manuals Updated/Revised? To comply with existing federal laws and regulations and established

USACE policy

To capture:

- New legislation

Mater Control Manuals

— Changes in basin hydrology and consumptive demands — Changes made in project operations or downstream of projects — Improvements in technology

— New environmental requirements





Study Process and Schedule

- and the second s





ROD – Record of Decision

Legend:

EPA – U.S. Environmental Protection Agency



Mobile District







Allatoona Dam

Weiss Dam

Carters Dam

ACT River Basin





Logan Martin Dam



3% –

7%

R.F. Henry Lock and Dam

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	USA	CE Pro	jects				
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* USACE has oversight of these four Alabama Power Company projects pursuant to Public Law 83-436, approved June 28, 1954.



Conservation Storage (acre-feet)





Millers Ferry Lock and Dam

Claiborne Lock and Dam



Water Supply Storage Reallocation Considerations

What is a municipal and industrial (M&I) water supply?

Who are M&I water supply users?

What is a water supply storage reallocation study?

- Addresses a water supply request

 - of quantity and cost

A water that is provided for consumption by residential, commercial, institutional, and industrial users

Residential users — single- and multi-family dwellings Commercial and industrial users — retailers, restaurants, manufacturing plants, and agricultural plants (processing plants)

Institutional users — schools, universities, and hospitals

Other users — public water needs (fire fighting and street cleaning)

An investigation of various water supply measures to reallocate storage under the authority of the 1958 Water Supply Act

Identifies the most likely- least costly water supply alternative compared to reallocation out of the reservoir

Provides a tentative recommendation for reallocation in terms









SMART Planning Feasibility Study Milestones* and the second second

Scoping (3–6 months)

Alternative **Formulation &** Analysis (6–13 months)

Alternatives Milestone USACE Vertical Team concurrence on array of alternatives

SMART planning is: S: Specific M: Measurable A: Attainable R: Risk Informed T: Timely

*Though not required to meet all requirements, this study utilizes aspects of the SMART Planning Feasibility Study Process Framework







Tentatively Selected Plan (TSP)



36 Months





Social Effects

Allatoona and Carters projects provide benefits for the surrounding social environment through project purposes such as recreation, navigation, hydropower, municipal and industrial water supply, and flood control.



Carters Lake

Recreation

The Allatoona and Carters projects provide significant benefits through recreational opportunities such as boating, camping, fishing, hunting, picnicking, sightseeing, and waterskiing. The ACT River Basin federal projects had approximately 7.4M project visits in 2016.

Navigation

There are no specific regulation requirements to support navigation at the Allatoona or Carters projects. The seasonal variation in reservoir storage does redistribute downstream flows, however, and other operations at Allatoona provide a benefit to downstream navigation south of Montgomery, Alabama.

Socioeconomics



Carters Dam

Hydropower

Electricity is generated from the projects during periods of high usage to assist in meeting peak power demands, reducing the cost of power generation, and reducing the need for additional sources of power production. In 2017, the ACT River Basin federal projects (Allatoona was online for a partial year) produced 1.1M mega watt hours representing \$50 million in revenue.

Municipal and Industrial Water Supply

- Water storage from Allatoona Lake is allocated for withdrawal for the City of Cartersville, Georgia, and the Cobb County-Marietta Water Authority.
- Water storage from Carters Project is allocated for withdrawal for the City of Chatsworth, Georgia.



Flood Risk Management

A major benefit of the Allatoona and Carters projects is their capacity to store water and later release it in moderate amounts to prevent downstream flooding impacts.

Flood Damages Prevented Downstream from Allatoona and **Carters Projects**

Year	Allatoona w/Rome	Carters w/Rome
1987	\$10,504,000	\$0
1990	\$58,480,400	\$219,100
1991	\$1,014,276	\$1,037,157
1992	\$1,646,639	\$1,076,319
1993	\$5,063,316	\$5,076,316
1994	\$878,077	\$736,434
1995	\$13,554,749	\$10,207,062
1996	\$148,249,653	\$148,161,613
1997	\$26,155,013	\$26,155,013
1998	\$89,575,134	\$84,483,008
2003	\$1,077,822	\$144,401
2004	\$11,405,309	\$425,559
2009	\$8,721	\$3,364
2010	\$20,330,262	\$285,474
2013	\$27,195,304	\$255,367
2014	\$10,794,432	\$1,104,165
2015	\$4,402,686	\$324,055
2016	\$16,164,471	\$273,497
2017	\$540,273	\$307,337
Total	\$465,395,428	\$280,303,526
Average	\$15,012,756	\$9,042,049







State of Georgia's Updated Water Supply Request



Hickory Log Creek Reservoir

Received March 30, 2018

- 2050 water supply need from Allatoona Lake is 94 million gallons per day (mgd), including current water supply contract amounts:
 - 57 mgd for Cobb County-Marietta Water Authority
 - 37 mgd for City of Cartersville
- Assumes full credit for Hickory Log Creek Reservoir releases





Allatoona Dam

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		Utiliza
		Provid

Allatoo

- hat USACE consider:
- native storage accounting odology
- ation of pass-through conveyance
- ding full credit for return flows















Weiss and Logan Martin Projects

Has oversight of four Alabama Power Company projects for the authorized purposes of navigation and flood risk management:

— Harris Dam (Water Control Manual [WCM] updated in 2015) — H. Neely Henry Dam (WCM updated in 2015) — Logan Martin Dam (WCM update required) — Weiss Dam (WCM update required)

Alabama Power Company

Proposes to lower top of flood control level at Weiss and Logan Martin projects

Proposes to raise winter level at Weiss and Logan Martin projects

> Current reservoir easements at Weiss and Logan Martin projects are below the required maximum surcharge elevations







Water Supply at Allatoona Lake

- Conservation
- **Groundwater**
- Desalination and pumping to service areas
- Other existing surface water sources
 - **Reallocation from Allatoona Lake** flood storage pool
 - **Reallocation for Allatoona Lake** inactive storage
 - **Reallocation from Allatoona Lake** conservation storage
 - Hickory Log Creek Reservoir
- Other new reservoir construction

Preliminary Identified Measures¹

(APC) projects





¹Measure = A solution that addresses a problem; a component of an alternative

Flood Operations at **APC Projects²**

Raise winter pool levels Lower top of flood pool levels Modify induced surcharge operations

Acquire additional property interests

²Only non-structural measures are being considered for Alabama Power Company





Summary of Current Operations

- Control Manual (WCM).
- H. Neely Henry
- provide for reduced levels of service
- Minimum Flows:

 - Carters
 - Carters Lake
 - Zone 2 minimum flow releases would be 240 cfs
- storage agreements

Alabama Power Company (APC): Projects operate pursuant to the current operations, current approved USACE WCMs at APC projects, and the current approved Alabama, Coosa, Tallapoosa (ACT) River Basin Master Water

• Guide Curves: Operate using existing guide curves, includes Allatoona fall step-down and higher winter level at

Action Zones: Operate using existing action zones: Allatoona (Zone 4), Carters (Zone 2)

Drought Operations: Defined drought intensity levels and associated drought triggers, dam releases/flow targets

Navigation: Seasonal navigation releases to support commercial navigation (9.0-ft or 7.5-ft channel depth), provided sufficient basin inflow above the APC projects is available

Allatoona continues to provide for a 240-cubic-feet per second (cfs) minimum flow.

— Zone 1 – minimum flow releases equal to the seasonal minimum flow based on the mean monthly flow upstream of

Hydropower: Typical hydropower peaking hours vary by action zone

Federal Water Supply: 19,511 acre-feet allocated to water supply

Fish & Wildlife: Seasonal minimum flow when Carters is in Zone 1







What is the Supplemental Environmental Impact Statement?

The Supplemental Environmental Impact Statement (SEIS) will:

- etc.
- evaluated

"Supplement" the existing Final Environmental Impact Statement (EIS) Update of the Water Control Manual for the Alabama-Coosa-Tallapoosa (ACT) River Basin in Georgia and Alabama (October 2014)

Consider additional environmental impacts in the natural environment or communities based upon a water supply storage reallocation at Allatoona Lake and a flood operation analysis at Alabama Power **Company's Weiss and Logan Martin Reservoirs**

Include an analysis of effects of the proposed action (s) and alternatives on resources such as: natural resources (water, air and wildlife), cultural resources, land use, recreation, aesthetics, and socioeconomic impacts,

Include a description of the baseline conditions of the affected environment against which effects of the proposed action are









Opportunities for public involvement in the feasibility study* and integrated SEIS process: Public Scoping Meetings (2018) Public Review of Draft SEIS (2019) State and Agency Review of Final SEIS (2020)



Major NEPA Milestones



Evaluate Env. Impacts

Compare Alternatives & Solutions

Identify Preferred Alternative







Authorized Purposes	Wate
in ACT River Basin	Gro
Fish and Wildlife Conservation	Hist Fut
Flood Risk Management	Nee
Hydropower	Sur
Navigation	Wat
Recreation	

- Water Quality
- Water Supply

Environmental Considerations and the second of the second o

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ter Quality

Natural and **Biological Resources**

- Air Quality
- Cultural Resources
- Fish and Aquatic Resources
- Land Use
- Terrestrial and Wetland Vegetation
- Threatened & Endangered Species
- Wildlife

Socioeconomic Resources

- Environmental Justice and Protection of Children
- Flood Risk Management Concerns
- Population





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and the second second



Current Storage Allocation

CORPS OF ENGINEERS

U.S. ARMY



Guide Curve

APPENDIX A PLATE 3-1











ACT Basin Project Overview Map



Allatoona Dam and Lake

- Reservoir with full summer conservation pool at elevation 840 feet msl
- 82.2 megawatt (MW) power plant









Alabama Power Company Proposed Changes

Weiss Proposal

- 1. Raise Winter Level from 558 to 561
- 2. Lower Top of Flood Control from 574 to 572
- 3. Results in 30% reduction in Winter Flood Control Storage
- 4. Results in 24% reduction in Summer Flood Control Storage
- 5. During Surcharge Operation, Increase releases at same reservoir elevations



Logan Martin Proposal

- 1. Raise Winter Level from 460 to 462
- 2. Lower Top of Flood Control from 477 to 473.5
- 3. Results in 35% reduction in Winter Flood Control Storage
- 4. Results in 35% reduction in Summer Flood Control Storage
- 5. During Surcharge Operation, Increase releases at same reservoir elevations





Reservoir System Simulation (HEC-ResSim) Software Developed by the U.S. Army Corps of Engineers



Coordinates: 1979461 east, 1029265 north	Local Workspace ACT-HLC_WCM_24Apr2014_HRPlansDFG opened

Reservoir Allatoona	 Description Allato 	ona Reservoir	
Physical Operations Observ	ed Data		
Operation Set Burkett D + Wit	ndrawals ~	Description Burkett D with (diverted outlets for CCMWA
Zone-Rules Rel. Alloc. Outa	ages Stor. Credit Dec. S	ched. Projected Elev	
Top of Dam	Operates Release From	: Allatoona-Power Plant	
CCMWA Qo	Hydropower - Power Gui	de Curve Rule: PowerGC Z	1_4hrs_Seasonal
Cartersville_Qo_wR	Description: Concrete n	ower for 4 hours while in Co	on (weekdays only)
InducedSurch-Emer	Generate p	ower for 4 nours while in Co	(weekdays only)
Elood Control	Zone at Top of Power Po	ol: Conservation	~
MinQ_SmallUnit_21	Zone at Bottom of Power	Pool: Zone2	~
CCMWA_Qo	0/ Davida Otara a	Diant Canta	- (0() 120 T
Cartersville_Qo_wR	% Power Storage	e Plant Facto	16.67 100-
MaxCC_9500		100.0	16.67 <u>0</u>
Max@Cartersville_1:			-08 g
Max@Kingston_997			전 60-
PowerGC FC 4hrs			8 40-
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CCMWA_Qo			ł
Cartersville_Qo_wR			16
Max@Cartersville 1:			
Max@Kingston_997			Po
Max@RomeCoosa_			
PowerGC Z1_4hrs_1			
B I Fishspawning			

W	Release Decision	Report: Allatoona	

<

Alternative: HRPlanG---0:HRPlanG Run: HRPlanG---0

– 🗆 X

>

Lookback: 06 Jan 1939, 0000 Start Time: 20 Jan 1939, 0000 End Time: 31 Dec 2012, 0000

File Options

Rule Key: GC=Guide Curve, RO=Release Override, EO=Elevation Override, ZB=Zone Boundary

Date-Time					
	Active Zone	Net Inflow (cfs)	Allatoona	-Dam	-Dam L&O
	Elev (ft)		Active Rule	Active Rule	Uncontrolled
			Flow (cfs)	Flow (cfs)	Flow (cfs)
					Unc 🔨
19Jan1939, 24:00	823.80	1,809.33	1,727.94	1,657.15	C
	Zone3		MinRelease	MinRelease	Unc
20Jan1939, 24:00	823.88	1,466.06	1,174.87	1,104.07	75
	Zone3		MinRelease	MinRelease	Unc
21Jan1939, 24:00	824.12	1,306.57	360.79	290.00	75
	Zone3		GC	GC	Unc
22Jan1939, 24:00	824.28	1,193.11	517.13	446.34	75
	Zone3		MinRelease	MinRelease	Unc
23Jan1939, 24:00	824.27	1,115.16	1,176.56	1,105.77	75
	Zone3		MinRelease	MinRelease	Unc
24Jan1939, 24:00	824.27	1,203.56	1,176.54	1,105.75	75
	Zone3		MinRelease	MinRelease	Unc
25Jan1939, 24:00	824.38	1,617.00	1,176.77	1,105.98	75
	Zone3		MinRelease	MinRelease	Unc 🗸





Sample Output Variables		
Pool Elevation	Streamflow	
Inflow	Stage	
Discharge	Storage	
Hydropower	Net Withdrawal	
Evaporation	State Variable	









Water Supply Storage Agreements







Proposal for Storage Accounting and the second second

Storage Accounting Example

Formula: End Storage = Beginning Storage + Inflow Share – Loss Share – User's Usage







ACT River Basin

and a second second







ACT River Basin

and a second second







ACT River Basin Profiles

and the second second







The **river profile** shows how a river's gradient (or slope) changes as it flows from its source to its mouth. The river profile is created by plotting the elevation of the river above sea level at various points over its entire course. These river profiles also depict key locations and features along the length of the river, such as







reservoirs, dams, cities, state lines, and confluences with other major tributaries and rivers.

station Mail comments to: P.O. Box 2288

Submit Comments

Submit your scoping comments on the Allatoona Lake Water Supply Storage Reallocation Study and the Updates to the Weiss and Logan Martin Reservoirs Project WCMs by August 15, 2018, in one of the following ways:

Submit comments on comment forms

Provide verbal comments at the court reporter

Email comments to ACT-ACR@usace.army.mil

USACE Mobile District Commander ATTN: PD-EI (ACT-ACR)

Mobile, AL 36628-0001





If you would like your verbal comments to become part of the public record, please make your statement to the court reporter. If you prepared a written statement, please leave it with the court reporter.

Court Reporter






ACT Projects



* USACE has oversight of these four Alabama Power Company projects pursuant to Public Law 83-436, approved June 28, 1954.



- Reservoir with full summer power pool at elevation 465 feet msl
- 128.25 MW power plant





What is induced surcharge, and why do I care?

Induce means to force, and *surcharge* means extra. So, in an *induced surcharge operation*, you are forcing extra storage to be created in the reservoir by opening the spillway, or tainter, gates. With the top of the spillway gates at a higher elevation, additional storage is created and, with the gates open, more water is released from the reservoir.

For more information, visit <u>https://hec-ressim.blogspot.</u> <u>com/2016/03/induced-surcharge.html</u>.

In reservoir operations, there is a *tainter gate* that keeps water in the reservoir. Flood easements, land with little to no development maintained natural in case of flooding, are held, by reservoir managers, around the reservoir to allow the lake level to rise from the *conservation pool* to the *flood control pool* during flood operations.

An induced surcharge operation allows more water to be held in the *induced surcharge pool*. Raising the tainter gate to release water can allow for additional space for flood storage. Water is released at a slower rate to allow water to fill behind the gate. The top of the induced surcharge pool occurs when the tainter gate is opened all the way.

This type of operation will occur during moderate to major flood events at Weiss Dam and Logan Martin Dam.

If you live near a reservoir or downstream from a reservoir, induced surcharge operations effect the timing and volume of water levels. The USACE flood study will look at how proposals, or *measures*, would be expected to change water levels in reservoirs and downstream and the duration of higher flows downstream.



TYPICAL INDUCED SURCHARGE OPERATION GATES IN CLOSED POSITION



TYPICAL INDUCED SURCHARGE OPERATION Flood Easement, GATES IN OPEN POSITION



Alabama Power Company Proposed Changes



Green is the current level, and blue is the proposed level. Shaded areas = Loss in flood storage







INDUCED SURCHARGE OPERATION WITH LOWER EASEMENT GATES IN OPEN POSITION

Weiss Project Proposal

- 1. Raise winter level from **558** feet to **561** feet.
- 2. Lower top of flood control from **574** feet to **572** feet.
- 3. Results in 30% reduction in winter flood control storage.
- 4. Results in 24% reduction in summer flood control storage.
- 5. During induced surcharge operation, increase releases at the same reservoir elevations.



Orange is the current level, and blue is the proposed level.

Logan Martin Project Proposal

- 1. Raise winter level from 460 feet to 462 feet.
- 2. Lower top of flood control from 477 feet to 473.5 feet.
- 3. Results in 35% reduction in winter flood control storage.
- 4. Results in 35% reduction in summer flood control storage.
- 5. During induced surcharge operation, increase releases at same reservoir elevations.

Ultimately this proposal would lower the induced surcharge pool. The study will look at how this proposal, and any other feasible measures identified during scoping, would be expected to change water levels in reservoirs and downstream and the duration of higher flows downstream.



Logan Martin Lake

Project Description

Logan Martin Lake is located in Alabama on the Coosa River, about 13 miles upstream from the City of Childersburg, Alabama. Operated by Alabama Power Company (APC), the reservoir is used for hydropower generation, flood risk management, navigation flow augmentation, maintenance of water quality, industrial and municipal water supply, irrigation withdrawals, recreation, and habitat for fish and wildlife conservation. The project consists of a dam with a concrete gated spillway section with earth-fill abutment dikes. The spillway has six tainter gates and one trashbay gate. The powerhouse has three units with a total generating capacity of 128.25 megawatts. The lake has 275 miles of shoreline and a maximum depth of 69 feet at the dam.

Quick Facts

Location: River Mile 99.5; Coosa River; Saint Clair, Talladega, and Calhoun Counties, AL

Drainage area above damsite: 7,770 square miles

Construction completed: 1964

Project purposes: Flood risk management, hydropower, navigation, recreation, water supply, water quality, and fish and wildlife

Area of reservoir: 15,269 acres

Full summer pool level: 465 feet NGVD29

Full winter pool level: 460 feet NGVD29

Flood storage capacity: 245,300 acre-feet

Conservation storage capacity: 144.383 acre-feet

Number of generating units: 3

Total generating capacity: 128.25 megawatts

Dam: Concrete gated spillway section with earth-fill abutment dikes

Spillway crest: 432 feet NGVD29

Spillway gates: 6 tainter gates, 1 trash gate

Owner: Alabama Power Company





Water Control Operations

APC usually operates the Logan Martin Dam and Lake project in a peaking mode for several hours per day during the week, depending on electrical power demand. Discharges from the Logan Martin Dam powerhouse enter the upper reaches of Lay Lake immediately downstream from the Logan Martin Lake.

APC operates Logan Martin Dam and Lake in coordination with its other hydropower projects on the Coosa River for flood risk management and navigation in accordance with regulations prescribed by the Secretary of the Army. The APC and the U.S. Army Corps of Engineers (USACE) adopted a Memorandum of Understanding (MOU) in December 1965 concerning the operation of the Logan Martin Lake project, which, along with the USACE 1968 Water Control Manual (WCM) for the project, guides implementation of the regulations. The MOU and the associated WCM clarify the responsibilities of the two agencies for operation of the project for flood risk management and other purposes and provide for the orderly exchange of hydrologic data.

Whenever the basin inflow causes the Logan Martin Lake reservoir to rise above the guide curve elevation all inflow up to a total of 50,000 cubic feet per second is passed through the power plant until its discharge capacity is exceeded. After that, as inflows and pool levels increase, excess flows are passed through the spillway until the pool levels recede to the guide curve elevation and within the discharge capacity of the powerhouse, in accordance with specific operational procedures detailed in the project's WCM.





Weiss Lake

Project Description

Weiss Lake, located mostly in northeastern Alabama, is the farthest upstream of the seven Alabama Power Company (APC) reservoirs on the Coosa River. It has a surface area of 30,027 acres and extends about 52 miles upstream from Weiss Dam, including about 11 miles that extend into northwestern Georgia. The reservoir has 447 miles of shoreline and a maximum depth of 62 feet, and is relatively shallow at a depth of about 10 feet at normal pool elevation. Weiss Lake is used for hydropower generation, flood risk management, navigation flow augmentation, maintenance of water quality, industrial and municipal water supply, irrigation withdrawals, recreation, and habitat for fish and wildlife conservation. The generating capacity of the project is 87.75 megawatts.



Quick Facts

Location: River Mile 226; Coosa River; Cherokee County, AL

Drainage area above damsite: 5,270 square miles

Construction completed: 1960

Project purposes: Flood risk management, hydropower, navigation, recreation, water supply, water quality, irrigation withdrawals, and fish and wildlife

Area of reservoir: 30,027 acres

Full summer pool level: 564 feet NGVD29

Full winter pool level: 558 feet NGVD29

Flood storage capacity: 397,000 acre-feet (Pool level 564 feet to 574 feet)

Conservation storage capacity: 263,417 acre-feet

Number of generating units: 3

Total generating capacity: 87.75 megawatts

Dam: Concrete gated spillway section with earth-fill abutment dikes

Spillway crest: 532 feet NGVD29 Spillway gates: 6 Owner: Alabama Power Company



Water Control Operations

APC usually operates the Weiss Dam and Lake project to produce hydropower as needed by the electrical grid. Typical operation for power generation ranges from 1 to 6 hours per day during the week, with no generation on the weekend. The dam's operation is coordinated with releases from H. Neely Henry Lake to keep the pool levels in balance and fairly stable. Discharges through the Weiss Dam powerhouse flow into a 1,300-foot-long, man-made tailrace canal to reenter the Coosa River at the downstream end of the bypass reach. Discharges from the powerhouse tailrace enter the upper reaches of APC's downstream H. Neely Henry Lake, which has a normal full-pool elevation of 508 feet. The H. Neely Henry Lake pool inundates the Weiss Lake tailwater at the power plant.

APC operates Weiss Dam and Lake in coordination with its other hydropower projects on the Coosa River for flood risk management and navigation in accordance with regulations prescribed by the Secretary of the Army. The APC and the U.S. Army Corps of Engineers (USACE) adopted a Memorandum of Understanding (MOU) in December 1965 concerning the operation of the Weiss Lake project, which, along with the USACE 1965 Water Control Manual (WCM) for the project, guides implementation of the regulations. The MOU and the associated WCM clarify the responsibilities of the two agencies for operating the project for flood risk management and other purposes and provide for the orderly exchange of hydrologic data.

Whenever the basin inflow causes the Weiss Lake reservoir to rise above the guide curve elevation, APC operates the power plant at full-gate capacity around the clock until the reservoir recedes to the level of the guide curve. When the reservoir level reaches elevation 564 feet, all inflow is passed through the power plant until its discharge capacity is exceeded. After that, as inflows and pool levels increase, excess flows are passed through the spillway until the pool levels recede to the guide curve elevation and within the discharge capacity of the powerhouse, in accordance with specific operational procedures detailed in the project's WCM.





Reservoir System Simulation (HEC-ResSim) Software Developed by the U.S. Army Corps of Engineers





Reservoir Modeling and Analysis



US Army Corps of Engineers Mobile District

What's covered under the NEPA umbrella?

The National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.)

NEPA requires federal agencies to consider impacts on the human environment from proposed actions and document environmental impacts during project planning. The Council on Environmental Quality (CEQ) regulations (40 CFR parts 1500-1508) and Engineering Regulation 200-2-2 [33 CFR part230] govern how NEPA is implemented by the U.S. Army Corps of Engineers (USACE).

The NEPA process also provides a framework for compliance with other environmental statutory requirements. The most commonly applicable laws and policies for water resource projects are listed here.

Anadromous Fish Conservation Act of 1965, as amended (16 U.S.C. 757 et seq.) (AFC) Authorizes the Secretary of Commerce and the Secretary of the Interior to enter into cooperative agreements with states and other nonfederal interests for the conservation, development, and enhancement of the fishery resources of the U.S. for species that migrate from salt to fresh water to spawn.

Antiquities Act of 1906, as amended

(16 U.S.C. 433) Regulates salvage of any object of antiquity in marine protected areas in which the U.S. has the authority to protect submerged cultural resources.

Archaeological and Historic Preservation Act, as amended (16 U.S.C. 469) (AHPA) Requires federal agencies to identify and recover data from archeological sites threatened by their actions, and to preserve historical and archaeological data that might be lost specifically through dam construction.

Archeological Resources Protection Act, as amended (16 U.S.C.

470aa-470mm) (ARPA) Requires permits and provides for civil and criminal penalties for persons disturbing archaeological resources on federal and tribal land without a permit.

Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c) Prohibits the take of bald and golden eagles (including parts, nests, and eggs) without a federal permit.

Clean Air Act (42 U.S.C. 7401 et seq.) (CAA) Requires agencies to comply with state air quality standards set in state implementation plans.

Clean Water Act (33 U.S.C. 1251 et seq.), also known as the Federal Water Pollution Control Act of 1948, as amended (CWA) Protects, restores, and enhances the quality of the nation's waters. Requires federal agencies to consider, during the planning for any reservoir, storage to regulate streamflow for water quality control.

Coastal Barrier Resources Act of 1982 (16 U.S.C. 3501-3510)

Protects undeveloped coastal barriers and related areas by prohibiting direct and indirect federal funding of various projects in these areas that might support development. **Coastal Zone Management Act (16 U.S.C. 1451-1456) (CZMA)** Federal agency activity within or outside the coastal zone that affects any land or water use or natural resource of the coastal zone shall be carried out in a manner that is consistent to the maximum extent practicable with the enforceable policies of approved state management programs.

Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C.

9601-9675) (CERCLA) Requires reporting of releases and cleanup of releases of hazardous substances; also assigns liability for cleanup.

Emergency Wetlands Resources Act of 1986 (16 U.S.C. 3901-3932) Promotes the

conservation of wetlands to maintain the public benefits they provide and to fulfill international obligations contained in various migratory bird treaties and conventions.

Endangered Species Act (16 U.S.C. 1531) (ESA) Requires consultation with the U.S. Fish and Wildlife Service (USFWS) to ensure that actions do not jeopardize threatened or endangered species or their critical habitat.

Federal Water Project Recreation Act of 1965, as amended (16 U.S.C. 4601-12 et seq.) Requires federal agencies to consider potential outdoor recreational opportunities and fish and wildlife enhancement when planning navigation, flood control, reclamation, hydroelectric, or multipurpose water resource projects.

Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*) **(FWCA)** Requires consultation with the USFWS on actions affecting stream modifications.

Flood Control Act of 1944, as amended (16 U.S.C. 460) Authorizes the USACE to construct, maintain, and operate public park and recreational facilities at water resource development projects.

Food Security Act of 1985 (16 U.S.C. 3811 et seq.) Denies federal farm program benefits to producers who converted wetlands after December 23, 1985, and creates a system for inadvertent violations allowing farmers to regain lost federal benefits if they restore converted wetlands.

Historic Sites Act of 1935 (16 U.S.C. 461-467) Provides for the preservation of historic American sites, buildings, objects, and antiquities of national significance and for other purposes.

Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996 (16 U.S.C. 1801) Requires federal agencies to notify National Oceanic and Atmospheric Administration Fisheries regarding a proposed action that might adversely affect essential fish habitat.

Migratory Bird Treaty Act (16 U.S.C. 703-712) (MBTA) Decrees that all migratory birds and their parts (including eggs, nests, and feathers) are fully protected.

National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 et seq.) (NHPA) Requires agencies to identify historic properties subject to effect by their actions, and to consult with the State Historic Preservation Officer and others about alternatives and mitigation.

Native American Graves Protection and Repatriation Act (25 U.S.C. 3001-3013) (NAGPRA) Provides protection of Native American graves and for other purposes, including to clarify the right of ownership of artifacts.

Noise Control Act of 1972 (42 U.S.C. 4901 *et seq.*) Directs federal agencies to comply with applicable federal, state, and local noise control regulations.

Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901 *et seq.*) **(RCRA)** Regulates the collection, storage, transport, and disposal of hazardous and solid waste and regulates underground storage tanks.

Rivers and Harbors Act of 1899, as amended and supplemented (33 U.S.C. 401 *et seq.*) Authorizes USACE to regulate the construction of any structure or work within navigable waters. Further amendments and supplements prohibit the construction of any bridge, dam, dike, or causeway over or in navigable waterways of the U.S. without congressional approval and provide that storage may be included for present and future municipal or industrial water supply in USACE or U.S. Bureau of Reclamation projects.

Safe Drinking Water Act (42 U.S.C. 300f *et seq.***) (SDWA)** Protects the quality of drinking water the public receives from public water systems.

Water Resources Development Act of 1986, as amended (33 U.S.C. 2201

et seq.) Provides for the conservation and development of water and related resources and the improvement and rehabilitation of the nation's water resources infrastructure.

Watershed Protection and Flood Prevention Act (16 U.S.C. 1001 et seq.) Provides for cooperation with state and local constituents for the purpose of preventing erosion, floodwater, and sediment damages in the watersheds of the rivers and streams of the U.S. and furthering the conservation, development, utilization, and disposal of water and the conservation and utilization of land thereby preserving, protecting, and improving the nation's land, and water resources and the quality of the environment.

Executive Order (E0) 11514: Protection and Enhancement of Environmental Quality Federal agencies shall initiate measures needed to direct their policies, plans, and programs to meet national environmental goals. The CEQ, through the Chairman, shall advise and assist the President in leading this national effort.

EO 11593: Protection and Enhancement of the Cultural Environment

Directs federal agencies to preserve, restore, and maintain federally owned sites, structures, and objects of historical, architectural, or archaeological significance.

E0 11988: Floodplain Management Directs all federal agencies to avoid, if possible, development and other activities in the 100-year base floodplain.

EO 11990: Protection of Wetlands Directs all federal agencies to avoid, if possible, adverse effects on wetlands and to preserve and enhance the natural and beneficial values of wetlands.

EO 12088: Federal Compliance with Pollution Control Standards Delegates responsibility to the head of each executive agency for ensuring that all necessary actions are taken for the prevention, control, and abatement of environmental pollution.

EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations Requires each federal agency to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

EO 13045: Protection of Children from Environmental Health Risks and Safety Risks Requires each federal agency to make it a high priority to identify and assess environmental health risks and safety risks that could disproportionately affect children and ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health or safety risks.

EO 13175: Consultation and Coordination with Indian Tribal Governments Requires agencies, in formulating or implementing policies that have tribal implications, to consult with tribal officials regarding the need for federal standards and any alternatives that would limit the scope of federal standards or otherwise preserve the prerogatives and authority of Indian tribes.

EO 13186: Responsibilities of Federal Agencies to Protect Migratory Birds Directs federal agencies to promote the conservation of migratory birds. Created a Council for the Conservation of Migratory Birds, of which USACE is a member.

EO 13693: Planning for Federal Sustainability in the Next Decade Directs federal agencies to improve environmental performance and federal sustainability by promoting facility energy and water conservation and efficiency, and reducing greenhouse gas emissions.

EO 13751: Safeguarding the Nation from Impacts of Invasive Species Directs federal agencies to prevent the introduction of invasive species and to detect, control, and monitor invasive species to minimize their negative ecological, economic, and human health impacts.



Environmental Resource Maps

Critical Species Habitat



Land Use





Allatoona Lake

Project Description

Allatoona Lake is located in Georgia on the Etowah River, about 32 miles northwest of Atlanta and 26 miles east-southeast of Rome, Georgia. The 1,122-squaremile drainage area lies on the southern slope of the Blue Ridge Mountains. Operated by the U.S. Army Corps of Engineers (USACE), Allatoona Dam and Lake is a multiple-purpose project, originally authorized for hydropower, flood risk management, and navigation. Later congressional legislation added public recreation, water quality, fish and wildlife conservation, conservation of federally listed threatened and endangered species and their critical habitat, and water supply. The Allatoona Project is generally operated as a peaking plant for producing hydroelectric power, and, during off-peak periods, maintains a continuous flow of 240 cubic feet per second through the small unit. Reservoir releases required for conservation, or flood risk management operations will normally be used to produce hydropower. Such production is scheduled during peak energy demand hours throughout the week.

Quick Facts

Location: River Mile 47.86; Etowah River; Bartow County, GA

Drainage area above damsite: 1,122 square miles

Construction completed: 1949

Project purposes: Flood risk management, hydropower, navigation, recreation, water supply, water quality, and fish and wildlife

Area of reservoir: 11,862 acres

Full summer pool level: 840 feet NGVD29

Full winter pool level: 823 feet NGVD29

Flood storage capacity: 302,574 acre-feet

Conservation storage capacity: 284,580 acre-feet

Number of generating units: 3—2 @ 40 megawatts and 1 @ 2.2 megawatts

Total generating capacity: 82.2 megawatts



Dam: Concrete gravity-type structure with curved axis, top elevation of 880 feet NGVD29, and length of 1,250 feet

Spillway crest: 835 feet NGVD29

Operating action zones: 4

Owner: U.S. Army Corps of Engineers



Water Control Operations

Water levels in Allatoona Lake remain fairly stable during normal operating conditions. Lake levels vary only several inches, except during high inflows to the basin and flood storage drawdown in the winter, which reduces the pool from 840 feet to 823 feet. Flood flows captured in the reservoir are generally released slowly over subsequent weeks, unless additional flood flows are anticipated. Power releases from USACE's Allatoona Lake during the low-flow season augment flows at the Alabama Power Company's projects along the Coosa River. The hydropower releases also provide water for municipal and industrial needs in the Rome, Georgia, area and for navigation on the Alabama River downstream of Montgomery, Alabama during the dry season.

Current Allatoona Dam and Lake project operations are governed by *action zones* that define general operating principles and parameters when lake-level conditions are below the top of the conservation pool at any point during the year. The action zones for the project are shown in the figure. The line between zones is a guideline that does not dictate any mandatory, absolute change in outflow policy.

The existing guide curve at Allatoona Lake was revised in 2015 to implement a phased fall drawdown period from early September through December. Refined operations at Allatoona Lake include use of four action zones shaped to mimic the seasonal demands for hydropower. Modifications to the hydropower schedule are in place to provide greater operational flexibility to meet power demands while conserving storage.

USACE also manages fish spawning operations at Allatoona Lake. During the largemouth bass spawning period, from March 15 to May 15, USACE seeks to maintain generally stable or rising reservoir levels at Allatoona Lake. Generally stable or rising levels are defined as not lowering the reservoir levels by more than 6 inches, with the base elevation generally adjusted upward as levels rise from increased inflows or refilling of the reservoir.



Allatoona Lake action zones for project operation.



APPENDIX E SCOPING COMMENT SUMMARY TABLE

Number	Scoping Comment
NEPA Pro	cess (NEPA)
NEPA1	The No Action Alternative should assume current water supply demands. The No Action Alternative is the alternative that represents the de facto status quo with regard to agency action. In other words, the No Action Alternative must represent how the U.S. Army Corps of Engineers (USACE) is currently operating Allatoona Lake. Georgia understands that the USACE is considering two options for water supply demands under the No Action Alternative. The first option is to use a water demand that caps withdrawals at contract amounts as determined by the USACE current storage accounting methodology. The second option is to use a water demand that represents the actual amount of water withdrawn from the lake without an artificial cap. The USACE must choose the second option because it is the true No Action Alternative—that is, actual withdrawals represent the current status quo at Allatoona Lake and are consistent with how USACE is operating Allatoona Lake. The USACE, however, should also model the first option—capped withdrawals—not as the No Action Alternative but as an alternative baseline. The USACE should model both a No Action Alternative and an alternative baseline to address the disconnect the USACE created when it failed to consider water supply while updating the Alabama-Coosa-Tallapoosa (ACT) Basin Water Control Manual. The Record of Decision for the Manual adopts an alternative that implicitly caps Cobb County-Marietta Water Authority (CCMWA) withdrawals yet, in practice, USACE is not capping CCMWA. (GAEPD)
NEPA2	The Future Without Project Alternative should assume Georgia's 2050 water supply demands. The Georgia's Updated Request demonstrates that the State's water demand will increase in the future. This increased future need is the reason Georgia is requesting additional storage. (GAEPD)
NEPA3	The USACE April 30, 2018 Federal Register Notice states that the Supplemental EIS will include two separate studies: the reallocation Study that USACE is under Court order to address and the Flood Study that USACE is choosing to address. Georgia understands that USACE plans to address each study separately. USACE will perform the Reallocation Study, evaluate all Reallocation Study alternatives, and then choose a preferred Reallocation Study alternative. USACE will separately follow the same process for the Flood Study, that is, all Flood Study alternatives will be evaluated against each other before USACE selects a preferred Flood Study alternative. Only after selecting the preferred alternative for each separate Study will the Corps evaluate the overall impacts of the combination of the two alternatives. Georgia maintains that this is the correct sequencing. (GAEPD)
NEPA4	Based on decades of interaction, APC, FERC, and USACE have worked on this flood easement elevation issue and established release rates which should serve as the baseline for the USACE to use in the SEIS. With all the information provided to (and the interaction with) USACE by APC over the past 14 years, Alabama does not understand the need for the Weiss and Logan Martin projects being included in the USACE SEIS and formally encourages USACE to accept FERC's environmental assessment and "finding of no significant impact." This result seems appropriate considering USACE's involvement as a cooperating agency. If USACE cannot or will not exclude the Weiss and Logan Martin projects from the USACE SEIS, Alabama requests that USACE accelerate the review of the proposed changes after APC submits the additional requested hydrologic and hydraulic engineering analyses and approve the longstanding operations at Weiss and Logan Martin by APC. (ALOWR)
NEPA5	USACE must evaluate the effects of the action against the appropriate baseline condition. The No Action Alternative should be the status quo, including current levels of water supply use. USACE has suggested that the "baseline" for its analysis is USACE existing operations under the 2015 ACT Water Control manual with "current demand (up to limits of available storage)." The USACE "No Action Alternative" should not include a "cap" on CCWMA's withdrawals based on the disputed USACE storage accounting rules. (WSP)

Number	Scoping Comment
NEPA6	While the correct No Action Alternative is the status quo, the USACE failure to address water supply issues when it updated the ACT Master Water Control Manual creates some ambiguity regarding the proper baseline. Some have suggested that using uncapped withdrawals as the baseline condition hides the effects of water supply withdrawals that purportedly exceed what the storage contracts allow. To address these claims, and to ensure that any EIS fully analyzes and discloses the effects of the USACE actions, USACE should consider including an "alternative baseline" in the SEIS in which water supply withdrawals are capped under the disputed storage accounting rules. This alternative baseline could then be compared against both the No Action Alternative and the other alternatives under consideration. (WSP)
NEPA7	The No Action Alternative and the Future Without Project Condition should be analyzed using the same hydrology. In the USACE interagency scoping meeting presentation, USACE stated that the "baseline condition" (or No Action Alternative) would be analyzed using a hydrologic time series covering the period from 1939 to 2012. However, in discussing the Future Without Project Condition, USACE did not specify the hydrologic period that would be used, but instead stated only that it "includes climate change analysis." If USACE is suggesting that the No Action Alternative and the Future Without Project Condition would be analyzed using different hydrologic records, we do not concur. All project alternatives should be analyzed using the same hydrologic conditions, as that is the only way to isolate and discern the impacts of any actions USACE or others might take. In contrast, analyzing future conditions using a changed hydrology would confound the analysis, making it impossible to determine whether the projected effects are due to the actions under consideration or the changes in the hydrologic record. (WSP)
NEPA8	USACE should consider potential climate change effects. However, this should be a separate analysis designed to show the potential effects of the alternatives under possible future climate scenarios. (WSP)
NEPA9	Disaggregate the NEPA analysis for the Logan Martin and Weiss dams from the analysis necessary to support the State of Georgia's water supply request. Although the efficiency of combining the review for these three different proposed actions would appear logical, as all three actions would involve the ACT River basin, a legal challenge in connection with the hydropower license issued to Alabama Power Company (APC) by the Federal Energy Regulatory Commission (FERC) calls into question the operational paradigm for these two projects. As a consequence, it appears that the legal status of these projects remains subject to further administrative proceedings which may affect the underlying action that the USACE proposes to examine with the Notice of Intent. (SeFPC)
NEPA10	It is paramount that USACE honor the authorized project purposes to establish the proper baseline from which to measure whether there may be an adverse impact on authorized project purposes or whether a major operational change may be required. It remains important to establish for the record the authorized project purposes and the source of the authorization for purposes of the USACE analysis. (SeFPC)

Number	Scoping Comment
NEPA11	The scope of the NEPA analysis must originate with a proper baseline from which to measure the impact to authorized project purposes. Start from the premise of the water supply that is authorized and reflected in the current contracts rather than the withdrawals that have occurred and exceeded the available storage in the contract. This is the appropriate starting point from a legal perspective to determine not only the impacts for consideration of the Water Supply Act of 1958 (WSA) but also the amount of storage that should be brought under contract. If USACE utilizes the actual withdrawals of 47.1 mgd that occurred in 2006 as the baseline for evaluating a reallocation of storage, the baseline for measuring impacts against authorized project purposes will already include a withdrawal level that USACE has admitted violates the terms of the 1963 contracts. Furthermore, it will build into the subsequent storage contracts an amount of "free" storage, a highly prejudicial outcome for hydropower customers in light of the fact that the CCMWA has been using more storage than its contract allows for many years. For the proper analysis for the reallocation of required storage, the baseline must start with the legally permitted withdrawals of 34.1 mgd rather than the 47.1 mgd that USACE relied upon in the final EIS for the ACT Water Control Manual. (SeFPC)
NEPA12	The scope of the USACE analysis of the proposed Allatoona water supply storage reallocation must address the legal basis of—as well as the need for—any reallocation and fully and accurately assess its potential impacts, including downstream impacts to water quality, hydropower, flood control, navigation, and recreation. (APC)
NEPA13	Given the history of USACE/FERC/APC coordination of flood risk management considerations for Weiss and Logan Martin lakes, any additional evaluation of the potential environmental impacts of APC's proposed changes based on new information should not itself require an EIS. An Environmental Assessment (EA) alone should be adequate to satisfy NEPA requirements. The scope of any such EA would necessarily be narrower than the proposed SEIS, which would include the evaluation of unrelated changes proposed at Allatoona Lake. The current USACE proposal to prepare a single SEIS for all three projects will only further delay the proposed changes to APC's flood operations and guide curves at Weiss and Logan Martin. (APC)
NEPA14	Since the ACT water control manual has so recently been updated, explain why this study is being conducted.
NEPA15	Public scoping meetings should be held closer to the affected lakes.
NEPA16	Notify lake neighbors of scoping meetings through flyers or postings (physical, not electronic).
NEPA17	The "vote by dots" board used at the scoping meetings was confusing because it listed three overlapping categories: wildlife; threatened and endangered species; and fish and aquatic resources. This will make findings less accurate.
NEPA18	Have concerns in relation to dropping Allatoona Lake by 6 feet, starting months earlier than normal. Are there other alternatives to this?
NEPA19	The canvasing exercise environmental considerations at the public scoping meetings will yield misleading results without qualifier descriptions of each category.
NEPA20	More information is needed on what is planned for Allatoona Lake. Information provided to date does not provide a clear indication about the proposed action or what alternatives may exist. The information at the scoping meeting did not provide a clear and concise picture on what is being planned and has been translated by many as a lack of transparency. The Allatoona community requests a seat at the table as a key stakeholder of the future planning for the lake, similar to CCMWA and APC.

Number	Scoping Comment
NEPA21	There is no transparency in the planning process until the USACE sees fit to drop its proposal and, while we can add comments, we would be commenting blind because the Corp has not disclosed its plan for Allatoona Lake. Recommend a follow up scoping meeting once more concrete plans concerning Carters Lake and Allatoona Lake are developed.
NEPA22	Concerned that the USACE will give in to political and corporate pressure so that CCMWA and APC are made happy at the expense of others. Concerned that this process may have a foregone conclusion.
NEPA23	Provide specific information about potential impacts on wildlife, water costs, water quality impacts, and pros/cons of different options, including the options of "no change."
NEPA24	Consider selecting Pell City as a location for future hearings on this matter. As a centrally located municipality, the City would provide an easily accessible location for homeowners in the City, as well as many surrounding areas. The City also offers access to those in the Birmingham area, who may be more prone to attend the meetings at our location.
Water Su	pply (WS)
WS1	Recommend continued implementation of efficiency or conservation measures as a mechanism to minimize water supply withdrawal or storage use. (USEPA)
WS2	In determining its authority to reallocate storage at Allatoona Lake, USACE should follow the process outlined in the 2012 legal memorandum authored by the USACE Office of the Chief Counsel when USACE was determining its authority to reallocate storage at Lake Lanier. The 2012 legal memorandum recognized that USACE must focus on how a reallocation might affect the other congressionally authorized purposes for the project instead of determining whether a given reallocation is "major" based on an arbitrary percentage established without any analysis. Georgia maintains that the appropriate method for determining whether the USACE has the legal authority to allocate storage in Allatoona Lake under the WSA is for USACE to examine the impact of Georgia's Updated Request in the context of the original congressional authorization for the project. (GAEPD)
WS3	Georgia's updated water supply request provides the total projected demand for the Water Supply Providers (WSP). In the USACE interagency scoping meeting presentation, USACE stated that Georgia's March 2018 update to the water supply requests "assumes full credit for Hickory Log Creek Reservoir releases." The meaning of the USACE statement is unclear. To clarify, Georgia's March 2018 submittal stated that the total year 2050 projected demand for CCMWA and the City of Cartersville is 94 mgd. This demand remains unchanged regardless of how it is satisfied. While the request asked USACE to evaluate alternatives that would credit releases from Hickory Log Creek Reservoir and other made inflows, as described above, the projected future demands in that submission—57 mgd for CCMWA and 37 mgd for the City of Cartersville—reflect the total projected gross demand in the year 2050 for these jurisdictions. The projections are not dependent upon assumptions regarding the treatment of releases from the Hickory Log Creek Reservoir or on the availability of supplies from that project, but rather reflect the total demand expected to be supplied from existing and/or reallocated storage in Allatoona Lake. (WSP)

Number	Scoping Comment
WS4	USACE is not obligated to approve additional water supply to Georgia or CCMWA, since Allatoona Lake does not have water supply as a federally-authorized purpose. (ALOWR)
WS5	CCMWA's history of illegal withdrawals supports the denial of the water supply request or the establishment of strong enforcement mechanisms. CCMWA itself has admitted as much, taking the position that CCMWA's repeated violations have created a status quo whereby Georgia should be granted <i>more</i> storage. In open court, CCMWA's counsel admitted it has exceeded its contractual limits for water diversion every year since 1986—including multiple exceedances in 2016, a drought year when Coosa River flows at the Alabama-Georgia state line were at historic lows. (ALOWR)
WS6	Grant of any additional water supply storage space in Allatoona Lake to CCMWA must be accompanied by enforcement mechanisms that will do something to prevent CCMWA from acting illegally in the future. Any new water supply contract must be accompanied by assurances that the U.S. Department of Justice (DOJ) will act in the event of any exceedances. If it will not act, then interested parties such as Alabama must be given the independent right to enforce relevant contractual limits against Georgia and CCMWA. To facilitate enforcement, USACE must hinge any acceptance of the water supply request on the condition that any water withdrawal exceedances be automatically reported to DOJ, Alabama, and the general public. USACE should provide that Georgia must pay severe fiscal penalties in the event of a breach and lose its easement to withdraw water from Allatoona Lake. (ALOWR)
WS7	USACE should set objectively recognizable limits on its authority to reallocate storage space at Allatoona Lake under the WSA. Allatoona Lake does not have water supply as an authorized purpose. The congressional delegation of authority under the Act is predicated on meaningful limits on its reallocation authority, such as the ones that currently are present in USACE's engineering regulations. USACE also must define the term "project," in the context of assessing whether a reallocation would seriously affect "project" purposes, to include only Allatoona Lake. If the scope of a project's original authorizing legislation was limited to a single dam-and-reservoir facility, USACE has no authority to artificially lessen the hydrologic impact of its water allocation decisions by referring to effects on project purposes at other facilities in the basin. This improperly holistic approach is contrary to the WSA's text, which requires congressional authorization if a modification "of a <i>reservoir project</i> " would "seriously affect the purposes for which <i>the project</i> was authorized or would involve major structural or operational changes." (ALOWR)
WS8	The analysis behind Georgia's water supply request is not thorough enough. The request seeks a diversion of storage capacity in Allatoona Lake to sustain <i>annual daily average</i> withdrawals, when USACE allocations are traditionally done as a <i>percentage of conservation storage</i> or a total volume of water. Georgia's request therefore necessarily involves an estimate of an estimate, in that the <i>projected</i> need for Georgia users is stated in terms of a yield figure, itself an estimate of a sustainable rate of withdrawal. The potential for inaccuracies in the estimation of yield from a given storage, is just one example of the potential inaccuracy brought on by Georgia's approach. Using an annual daily average figure rather than acre-feet in storage accounting also leads to seasonal inefficiencies because total inflows and losses change throughout the seasons, meaning that the rate at which any user (or group of users) can safely withdraw water is much different in January than in, say, August. (ALOWR)
WS9	Another problem with Georgia's move away from using acre-feet elevation of conservation storage as the unit by which to evaluate its 2018 water supply request is that, according to ER 1105-2-100, USACE's congressional authority to manage the ACT River Basin is discretionary only insofar as no more than 15 percent of total storage capacity, or 50,000 acre-feet of elevation, whichever is less, is affected by any proposed change. ER 1110-2-240 states that USACE management of a multipurpose reservoir such as Allatoona Lake must strike a balance between the use of water storage for all project purposes. USACE must provide details as to how it will consider Georgia's request for an annual average daily amount as a percentage of conservation storage. (ALOWR)

Number	Scoping Comment
WS10	Paulding County presently receives about 10.6 MGD from CCMWA. However, Paulding County is constructing a pumped storage reservoir (Richland Creek Reservoir). Once completed, the Richland Creek Reservoir will supply the County its primary water supply, freeing up roughly 10.6 MGD for the CCMWA. The effects of Richland Creek Reservoir are not addressed within Georgia's March 2018 water supply request. Moreover, Paulding County obtained a permit to build a reservoir at Richland Creek with a yield that far exceeds Paulding County's projected needs. The excessive storage available in Richland Creek should be deducted from Georgia's water supply request. Richland Creek's impact on Allatoona Lake water releases (and, ultimately, the flow at the Alabama-Georgia state line) must be included in the USACE evaluation. (ALOWR)
WS11	Georgia's March 2018 water supply request fails to consider the option of incremental allocations of storage for water supply. By requesting storage reallocation today for millions of gallons per day in withdrawals to meet projected 2050 demands, Georgia is over-asking for whatever its needs are in 2018. None of Georgia's modeling for its 2018 water supply request allowed for the more sensible possibility of incremental allocations that increase with Georgia's more short-term demand projections. The necessary over-asking in every year prior to 2050 is exacerbated by the uncertainty factor applied by Georgia on a scale of 3 percent in 2018 to 13 percent by 2050. (ALOWR)
WS12	Georgia's technical analysis of its March 2018 water supply request does not appear to include any consideration of the effects of its requested allocation of "made inflows." An analysis of the effects of the "made inflow" concept is necessary in order to truly predict and evaluate the overall effect of the Georgia's request on downstream users such as Alabama. The inclusion of these "made inflows" into the model would necessarily reveal a significant impact to Allatoona Lake and the quantity of water available for downstream users like Alabama. In this sense, "made inflows" is not water created by CCMWA. This water exists in the Basin and would move through the project with or without any interference by CCMWA. In the 2018 request, however, Georgia refers to "made inflows" as somehow augmenting natural inflows. "Made inflows" are nothing more than <i>natural</i> inflows that have been impounded, redirected, or otherwise utilized before being released again into Allatoona Lake. (ALOWR)
WS13	The demand projections in the Georgia 2018 water supply request are flawed. Georgia's 2018 request is supported partly with a memorandum by the Director of the Metropolitan North Georgia Water Planning District (MNGWPD). The memo outlines Georgia's anticipated water supply demands from and returns to Allatoona Lake through 2050. As part of the calculations, the memo states that water conservation in the MNGWPD has reduced per capita water usage by 34 percent from 2000 to 2015, with a corresponding 10 percent decrease in water supply withdrawals over the same period. Using this reduced rate as a constant, the memo projects that 2050 demand will be around 25 percent lower than the 2009 report's projections (for 2050). Closer analysis shows that most of this overall decline in per capita water use occurred between 2000 and 2009, and much less of the decline occurred between 2009 and 2015. The 2009 report provided the basis of Georgia's 2013 water supply request, but this 2015 memo provides the basis for the present 2018 request. However, there is a <i>significant</i> difference in the MNGWPD's 2009 and 2015 demand projections. The latter memo states that MNGWPD jurisdictions are newly projected to use about twenty-five percent less water in 2050 than they were when the MNGWPD's plans were updated in 2009. If over eighty-five percent of the per capita water usage decline occurred before 2009, there is no justification for the significant reductions in demand due to conservation as applied to the 2018 request. (ALOWR)

Number	Scoping Comment
WS14	The current storage contract at Allatoona Lake that is held by CCMWA is insufficient to meet current needs and is entirely inadequate for future demands. Materials released by USACE in connection with the ACT water control manual updates unequivocally admit that CCMWA has made withdrawals that exceed current storage contracts. Because excess withdrawals are not covered by contract, delays in the evaluation of the water storage study accrue to the detriment of not only water supply stakeholders but also hydropower customers that rely upon the Allatoona project for capacity and energy. (SeFPC)
WS15	USACE must measure the water supply storage to be allocated by the same measurement standards authorized under the WSA of 1958 rather than the withdrawal levels that have exceeded the current storage contract held by the CCMWA. (SeFPC)
WS16	As the original authorization and subsequent public laws expressed congressional commitment to hydropower production at the time of construction, no such authorization exists for water supply at Allatoona Lake. Rather, water supply has been added as an authorized project purpose through the application of the WSA of 1958. The amount of water supply that may be available from Allatoona Lake remains confined to the restrictions of the WSA of 1958 and the limitations on reallocations that would adversely affect authorized project purposes or require major operational changes. Because USACE has exercised the authority provided by the WSA of 1958 to add storage for water supply for CCMWA in 1963, water supply is an authorized project purpose at Allatoona Lake. The extent of this authorization, however, is set forth in the current contract CCMWA has with USACE. (SeFPC)
WS17	USACE should consider the practical impacts of its water supply operations in Allatoona Lake, which have often gone beyond the legal limits provided under the WSA and existing water supply contracts with CCMWA and the City of Cartersville. Data made available by USACE indicates that CCMWA and Cartersville have both routinely exceeded their contractual water withdrawal limitations. Apparently, CCMWA has withdrawn at least 80 percent more than its storage contract allotment in every year since 1998. USACE has never undertaken any action to enforce contract limitations and has, in fact, tailored its reservoir operations to facilitate these excessive withdrawals. Any consideration of reallocation must also include enforcement mechanisms for violations. USACE should consider contract terms with explicit, meaningful penalties; otherwise blatant disregard of contract terms will likely continue. (APC)
WS18	It is unclear how USACE intends to analyze the totality of water supply operations in the upper Coosa Basin. APC understands that USACE intends to consider "pass through" operations from Hickory Log Creek reservoir as if those operations did not impact storage at Allatoona. Any inflows to Allatoona— regardless of source—should be treated as normal inflows to the lake and should not be credited to any particular user. Any water passed through to Allatoona for water supply purposes should be accounted for as part of any water supply agreement subject to the WSA. (APC)
WS19	The scope of the USACE evaluation of Georgia's March 30, 2018 reallocation request for Allatoona should include the option of denying the request. USACE evaluation of the reallocation request must recognize the legal limits of USACE authority under the WSA. Allatoona Lake was not originally authorized for either recreation or water supply. The only possible authority the USACE has to operate Allatoona for water supply derives from the WSA. The WSA only allows USACE to reallocate storage to water supply so long as the authorization would not "seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed." (APC)
WS20	If water flow into Weiss Lake is decreased, it may adversely affect the use of the lake for municipal and industrial (M&I) water supply.
WS21	Concerns that increased Georgia withdrawals from Allatoona Lake will decrease water availability for water supply in Alabama and result in shortages.

Number	Scoping Comment
WS22	USACE decision criteria should be governed by the principle that each major river basin should live within its existing watershed basin means, outside true emergency conditions, or should pay the injured locale for the right to remove capacity from one region to another. The northwest Georgia region should not have its assets (water) stripped to support the aggressive and oftentimes unbridled growth practices of, in particular, Fulton and Gwinnett Counties.
WS23	Consider several feasible long-term natural water supply storage alternatives. To bring these to reality you need foresight, patience, pumps, pipes and proactive-cooperative cross-governmental management, and money (likely much less money than the economic penalty that the State seeks to thrust upon us). Our metro area neighbors in the Lanier/Chattahoochee Basin should be mandated to care for their own drought supply needs routinely, instead of seeking to take from Etowah River resources for their solution. Initial prospective water storage sites for USACE consideration: Hurricane Hollow at the dam, Marble Road Quarry adjacent to Little River, Pumpkinvine Creek below Allatoona Pass, Vulcan Quarry off McKaskey Creek; Paga Mines below the dam; downstream Etowah Reregulation Dam; etc.
WS24	It is not clear how much water would be taken for water supply, particularly in the winter months, and the resulting effect on Allatoona Lake levels.
WS25	Metro Atlanta needs to look at the Tennessee River again as a potential source of future water supply.
WS26	Concerned about reallocation of Allatoona Lake storage for water supply. Governing bodies of Atlanta and Georgia have not planned for adequate water supply for the growth of the Atlanta area. It has been common knowledge for decades on how fast the Atlanta area has grown and continues to grow. Instead of investing taxpayers' money into basic infrastructure requirements such as water reservoirs, water supply infrastructure and sewage treatment facilities, they have placed priorities elsewhere. They should not be allowed to take resources from other cities, states and watersheds to reduce their own problems due to poor planning and management. Atlanta and Georgia must invest into new reservoirs and related infrastructure to supply their current needs and future growth.
WS27	Recognize that there may be an increased withdrawal from Allatoona by Georgia or Atlanta, but it doesn't necessarily have to equal the full amount they are requesting. Atlanta has reduced the amount they are using per capita. Unfortunately, they are growing to the point where the reduced per capita rate is offset by the increased numbers of people requiring water.
WS28	These is a lack of a long-range plan for water supply in the Atlanta area. What is under consideration will only take us to 2050, essentially a generation. A long-range plan is needed so future generations are not forced to fight over water.
WS29	Areas that wish to pull water from Allatoona Lake are not doing enough to conserve water to limit taking more resources. Build more reservoirs locally and in Alabama.
WS30	Concerned about the additional water consumption request from CCMWA and how the additional water would be used. Will there be contracts to sell water to Fulton or metro Atlanta interests? Concerned about the effects of additional withdrawals on recreation, water quality, and shoreline management of Allatoona Lake.
WS31	Do not allow the state of Georgia, Acworth, CCMWA, Cartersville, and others to take water from Allatoona to sell to other cities and deplete the lake.

Number	Scoping Comment
WS32	Oppose the proposal to increase the allocation to Allatoona Lake Reservoir which would effectively increase the ability of Atlanta to draw off an additional 44 million gallons per day. Their allocation of 50 million gallons per day is already high considering that it is unlikely any of the water drawn by Atlanta is returned to Allatoona to be available downstream. To increase that amount to almost double would have significant effects downstream in terms of reduced flow.
W\$33	Using Allatoona Lake water for water supply in order to sell it to other municipalities is not appropriate. Those municipalities should be addressing their own needs.
Flood Risl	< Management (FRM)
FRM1	USACE also plans to study potential changes to existing flood management operations at the Weiss and Logan Martin reservoirs on the Coosa River ("Flood Study"). APC operates these projects subject to a license from FERC. A recent court decision from the U.S. Court of Appeals for the D.C. Circuit, however, overturned FERC's decision and vacated APC's license. Despite the court decision and the license vacatur, if USACE decides to proceed with the Flood Study, it must consider whether the statutory limits placed on APC's ability to modify flood operations at the Coosa River projects prevent USACE from decreasing available flood storage. In Public Law 83-436, Congress expressly limited the ability of future project developers on the Coosa River, such as APC, to alter flood control storage for the projects. USACE must determine whether APC's requested changes to <i>minimize flood control storage</i> are consistent with Public Law 83-436. (GAEPD)
FRM2	Georgia understands that USACE is considering factoring in available flood storage at Allatoona Lake to determine whether proposed changes at the Weiss and Logan Martin projects comply with Public Law 83-436. This statute, however, does not reference or contemplate flood control storage in Allatoona Lake. Instead, it is specifically and expressly limited to the "Alabama-Coosa River and tributaries." Therefore, it would be inappropriate for USACE to consider available flood storage at Allatoona Lake in connection with the Flood Study. (GAEPD)
FRM3	Alabama understands that (1) materials presented at the USACE public scoping session were not accurate, (2) actual flood impacts from APC's proposed changes will not significantly change APC's current project operations at Weiss or Logan Martin projects. (ALOWR)
FRM4	USACE public scoping meeting materials suggest the USACE may consider a variety of different water supply scenarios at Allatoona, some of which could impact flood control operations at Allatoona or downstream at other ACT projects, including APC projects. USACE must consider any such impacts on flood risk. (APC)
FRM5	Any change in winter pool level should seriously consider impact on flooding downstream, especially in Rome, and increase sewer system overflow.
FRM6	Aware that raising the Weiss Lake pool in winter requires a lot of study. In favor of raising winter pool level as long as flood risk management can be maintained.
FRM7	Numerous people would like to see the winter pool elevation increased at Weiss and Logan Martin lakes. Others are concerned that doing so would cause flooding issues at Weiss Lake and Logan Martin lakes (both in lake and/or downstream).

Number	Scoping Comment
FRM8	Commission an objective Flood Retention Risk Assessment Update (for Allatoona Lake) based on the now 120 years of weather history to work toward a goal of reduced required winter drawdown levels flood storage needs.
FRM9	While the City of Pell City advocates for ample consideration of this modification to the winter pool level at Logan Martin Lake, that support is lent with the understanding that it can be obtained without increasing the risk of flooding in the area. Based on the materials presented, the City understands that the flood control aspects of this modification will be closely studied, and that the modification will only proceed if the results are favorable. The City is not in favor of increasing the risk of property loss or endangering its residents in this regard, and fully supports the thorough examination of these impacts.
FRM10	Local discussions about Allatoona Lake levels seem to not focus on fact that Allatoona is a flood control reservoir. Water supply for ever growing population is important, but not the primary reason for Allatoona. Metro Atlanta needs to consider more reservoirs for water supply. The lake should be below full pool for flood control all year with few fluctuations.
FRM11	Stronger flood easement enforcement is needed at Weiss Lake. Currently, the easements are filled with RVs and campers that are more permanent than movable. Once a year, the RVs and campers should be removed from their location. This will prevent the permanent campers that have been in the easement for years and to the point that they cannot be moved if a flood is coming. This will not be popular, but the guidelines call for it and they need to be enforced.
Hydropov	ver (HP)
HP1	Georgia's 2018 water supply request fails to include "made inflows" into its calculation of hydropower generation losses at Allatoona Lake. (ALOWR)
HP2	The legislative history for the Allatoona project clearly demonstrates that it was authorized for hydropower production, flood control, and navigational support. Specifically, Congress authorized the construction and operation of the Allatoona project in the Flood Control Act of 1941 "in accordance with the recommendation of the Chief of Engineers in House Document Numbered 674, Seventy Sixth Congress, third session" (SeFPC)
НРЗ	APC relies on the upstream flows from the Allatoona and Carters projects in determining how much flow it may depend on to generate electricity from its hydroelectric dams in order to assure that the electricity needs of its customers are met. USACE has estimated that, for every kilowatt hour of electric energy generated at the Allatoona project, three additional kilowatt hours are generated at the downstream power plants. Accordingly, lower flows from reduced hydro-generation at the Allatoona project result in reduced hydro-generation at APC's Weiss project and the other APC projects downstream on the Coosa River. (APC)
HP4	The USACE should consider the potential impacts of water supply operations on downstream hydropower generation. The USACE analysis of hydropower operations should consider the potential increasing value of hydropower generation in the future, including forecasted energy prices available from the Southeastern Power Administration (SEPA). USACE should also examine impacts to hydropower during seasonably sensitive times when low flows could have the most severe impacts on hydropower value. (APC)
HP5	If Georgia draws more water from the water supply of the Coosa River, it leaves less available water in Alabama lakes for hydropower and other uses.

Number	Scoping Comment
Navigatio	n (NV)
NV1	Any analysis of Allatoona water supply operations should take impacts to navigation into account. Navigation is not only a primary authorized purpose of the USACE projects in the ACT River Basin; it is also historically important for commerce in Alabama. Historically, commercial navigation supported timber, wood products, mining activities, and agriculture, peaking at 4.1 million tons in 1986. (APC)
NV2	Provide better markers to navigate the river channel in Weiss Lake.
Water Ma	anagement Practices/Recommendations (WM)
WM1	Recommend that the USACE include information regarding how the proposed modification to the winter pool levels at the Weiss and Logan Martin may affect downstream flows in the Basin and impact the overall operations of the preferred alternative. (USEPA)
WM2	The storage capacity needed to support average annual withdrawals of 94 mgd will depend upon the assumptions the USACE makes about the storage accounting rules USACE will apply at Allatoona Lake. Those assumptions include: (1) how to account for "made inflows" and (2) other storage accounting issues. Made inflows are flows allocated by the State of Georgia to CCMWA and include both releases made by CCMWA from Hickory Log Creek Reservoir and return flows of treated wastewater into Allatoona Lake or its tributaries on behalf of CCMWA. Consistent with Georgia law, USACE should credit 100% of these made inflows directly to CCMWA's storage account (provided CCMWA has available storage space). Other storage accounting issues include decisions as to when CCMWA's and Carterville's accounts reset to full and the percentage of inflows (separate from made inflows) to which CCMWA and Cartersville are entitled. USACE should consider and resolve these outstanding storage accounting issues as part of the Reallocation Study when determining how much additional storage USACE must reallocate to meet Georgia's 2050 needs. Resolving these issues is a critical first step because it is possible that if USACE credits made inflows to CCMWA and resolves the other storage accounting issues as specified in the Updated Request, CCMWA may not need any additional storage to meet its projected 2050 demand. (GAEPD)
WM3	Evaluate an alternative that corrects the USACE storage accounting rules at Allatoona Lake, which have been disputed since 2007 when USACE first proposed them. These accounting rules are the subject of separate litigation by CCMWA. USACE has acknowledged that disputes regarding storage accounting at Allatoona Lake and the treatment of water released from storage in Hickory Log Creek Reservoir were not addressed in 2015 update to the ACT Master Manual and need to be resolved. (WSP)

Number	Scoping Comment
WM4	USACE storage accounting rules deny CCMWA credit for made inflows to Allatoona Lake from two sources: (1) engineered return flows from two water reclamation facilities and (2) water released from storage in the Hickory Log Creek Reservoir for transfer to CCMWA storage account in Allatoona Lake. This position effectively preempts CCMWA state-granted water rights. Pursuant to Georgia law, the State has granted CCMWA the exclusive right to impound and withdraw certain made inflows to Allatoona Lake Without either acknowledging CCMWA's water rights or explaining the USACE legal authority to allocate water in direct contravention of an allocation by the State of Georgia, the storage accounting rules allocate all inflows to the reservoir <i>pro rata</i> based on each user's percentage of conservation storage at full summer pool. Because CCMWA owns 4.61 percent of the conservation storage at full-summer pool, USACE allocates CCMWA 4.61 percent of any inflows to the project. The effect of the USACE rule is to deprive CCMWA of 95.39 percent of the made inflows granted to it by the State of Georgia and to transfer that water instead to other users (most notably, the USACE itself). Recognizing the right to use made inflows consistent with state law is also good policy. Doing so will encourage return flows and reduce consumptive uses of water; allow water users to integrate storage in existing federal reservoirs into their water supply systems by providing the ability to transfer water among projects, while protecting the water rights needed to meet growing water supply demands; and maximize the use of existing infrastructure, thereby avoiding needless environmental and economic impacts from constructing unnecessary and redundant projects to access this same water. (WSP)
WM5	The current storage accounting rules incorrectly define the conservation storage at Allatoona Lake by ignoring the rule curve adopted in the ACT Master Manual and the resulting seasonal variations in the volume of the conservation pool. USACE should conform the storage accounting rules to the ACT Master Manual by recognizing that the rule curve defines conservation storage in Allatoona Lake and, accordingly, that all user accounts located in the conservation pool must be full whenever the reservoir is at or above the rule curve. Water supply storage held by CCMWA and the City of Cartersville is in the conservation pool. USACE also agrees, as it has previously recognized, that all storage accounts must be full whenever conservation storage is full. This is a matter of common sense and physics, because if a void exists in any portion of any water supply storage account, that same void must also exist within the conservation pool. Yet the USACE storage accounting rules regularly show CCWMA's account as being "empty" at times when the reservoir is above the rule curve, the conservation pool is full, and the project is in flood operations. This error is the result of the storage accounting rules' failure to acknowledge the rule curve and the seasonal variations in conservation storage. (WSP)
WM6	USACE should correct the formula used to allocate inflows <i>pro rata</i> so it reflects each user's actual share of conservation storage under the rule curve. The USACE storage accounting rules fail to acknowledge the rule curve and the seasonal variations in the volume of conservation storage. Specifically, the current accounting rules purport to assign inflows <i>pro rata</i> based on each user's share of the conservation storage pool. In making this calculation, the rules incorrectly use a fixed volume of conservation storage corresponding to the volume of conservation storage at full summer pool, when in fact the volume of conservation storage varies dramatically. (WSP)
WM7	The effects of the errors in the USACE storage accounting rules are significant. The errors deprive users of a sizable portion of the yield to which they are entitled and have significant implications for the WSP. In fact, if the USACE storage accounting rules are corrected per specific comments provided by the WSP, CCMWA will not require any additional storage capacity in Allatoona Lake because the yield of its existing storage will suffice to meet its year 2050 projected needs. (WSP)

Number	Scoping Comment
WM8	USACE must not adopt Georgia's proposed return credits and storage accounting system. USACE should adhere to its longstanding practice of proportionally crediting return flows to the storage accounts of all users, regardless of source. This system reflects a logical, time-tested approach. This system continues to provide predictability to both USACE and water users during periods of drought and will ensure that all authorized project purposes are consistently and equitably met. USACE's retention of its current approach is prudent because individual users' return flows can be uncertain, meaning that projecting future inflows from individual users can be a guessing game. This reflux of water is subject to social, economic, environmental, political, and other conditions that factor in to how (and where) users consume, store, and allocate their water. (ALOWR)
WM9	APC relies on flows from the Allatoona project to meet certain downstream flow obligations and commitments for navigation, species conservation and protection, water quality, municipal and industrial use, and recreation. (APC)
WM10	While APC's Tallapoosa projects are not directly downstream of any USACE projects, reduced flows in the Coosa River increase demands for additional releases from APC's Tallapoosa projects to support flows on the Alabama River. (APC)
WM11	APC's proposed revisions to the flood operation plans for the Weiss and Logan Martin projects include revising the Weiss and Logan Martin rule curves to raise the winter pool levels and to lower the upper limit of the induced surcharge operations at each reservoir. The current WCMs for both reservoirs contain surcharge curves with elevations higher than the respective flood easements acquired by APC and approved by FERC following consultation with USACE in the context of the original licensing of the upper Coosa River. APC is concerned that USACE has not accurately represented its proposed changes at Weiss and Logan Martin. Materials presented at the USACE public scoping open houses suggested that APC proposed to reduce actual flood storage in the winter and summer. While there is a reduction of flood storage at both projects in the winter due to an increased winter pool, there would be no reduction in the flood storage during summer pool periods compared to current baseline operations at Weiss and Logan Martin. APC is not proposing to change existing easements at either project. APC and USACE have both long recognized that surcharge curves at both projects do not reflect the best flood control operations in light of the FERC-approved and USACE-concurred flood easement elevations at the two reservoirs. (APC)
WM12	Some portion of the water supply withdrawals made from the Upper Coosa in Georgia are returned to the Chattahoochee River basin rather than to the Coosa River Basin. Any reallocation study should consider the extent of any interbasin transfers out of the Upper Coosa Basin that result from any water supply operations at Allatoona or the Richland Creek Reservoir. Interbasin transfers out of the Coosa Basin will further harm downstream flows. USACE must consider any such impacts in its analyses. (APC)
WM13	Make sure the man-made inflows back into Allatoona Lake are made part of the storage reallocation study. The study should recommend a water storage accounting methodology that accounts for man-made inflows to Allatoona Lake. All withdrawals by CCMWA should be offset gallon for gallon by wastewater return flows and releases into Allatoona Lake by Hickory Log Creek Reservoir. Establish a consistent nation-wide policy for accounting for man-made releases.
WMI4	With today's accurate and constantly improving weather forecasting capability, APC can proactively manage lake levels to mitigate extreme flooding and drought possibilities at all times of the year. APC has demonstrated that capability over the past few years when granted temporary variances to raise lake levels by 2 feet to address drought situations. Effective flood and drought control can be achieved in the future without having to rely on huge lake water level buffers. The USACE continually strives to improve water management technology or to utilize the best available information.

Number	Scoping Comment
WM15	Weather forecasting today is much better than it was 50 years ago. USACE and APC operators can drop these lakes much quicker and can manage them more efficiently.
WM16	Technology investments in water management and weather forecasting should be mandatory for all agencies/companies involved in local, state and federal water management practices. For example, APC should invest in automated water level monitors at many points in the Coosa River (not just at the dams) and at all major tributaries of the various lakes. Then use improved modeling software to allow the collected data to be proactively used. Other agencies should be investing in weather forecasting and how to coordinate population/business growth with potential water usage/needs. Coordinated National and State water management programs are critical to prevent future water management crisis.
WM17	The Etowah River Channel Capacity cap should be restored to 12000 cfs. Within this overall context, the cost to purchase a handful of Cartersville area flood easements would be insignificant compared to the added flood discharge flexibility from the added 3000 cfs from 9000 cfs.
WM18	The Allatoona Lake Rule Curve should be further revised to extend its Zone 2 at 840 into November.
WM19	USACE should work with SEPA, CCMWA, and Cartersville to develop seasonal market-based power and water supply pricing formulas. Each of those utilities charge their end users on an inverted price schedule, and USACE should apply a similar approach considering the much higher value of summer water and power.
WM20	Raise winter pool levels by 3 feet in Weiss Lake.
WM21	Rather than release more water to the Gulf in winter, retain more water in Weiss and Logan Martin lakes in case drought conditions are encountered the following spring and summer. More water in Weiss and Logan Martin would allow the flow out of Georgia to slow down some.
WM22	APC does an excellent job in controlling the water levels (on Weiss Lake) and the new proposal to raise the winter pool level would not be a problem for them.
WM23	Logan Martin Lake is normally kept at elevation 459 feet, sometimes at 458 feet, and is rarely kept at elevation 460 feet.
WM24	Lower the winter levels of Lay, Mitchell, and Jordan lakes by one foot and raise the level of Weiss and Logan Martin lakes by three feet.
WM25	Lower winter water levels at lakes below Logan Martin to offset allowing winter levels to be raised on Logan Martin Lake.
WM26	Concerned about low flow in Neely Henry Lake (APC) and potential lower lake levels due to increased withdrawal and usage of water by the Atlanta area.
WM27	Thoroughly examine impacts on the Tallapoosa River Basin since the ACT is operated as a unified system, changes on the Coosa River will impact the Tallapoosa River.
WM28	Do not drop water level (at Weiss Lake) by six feet in winter, or at least do not drop levels by six feet until the end of November each year. Weiss Lake levels are dropped too low and too fast in the fall.
WM29	During some seasons of the year, the flow in the Coosa River is reduced as the level of Allatoona Lake is held up at a higher elevation for recreational purposes. We are concerned that the lower flows can impact Neely Henry, Weiss, and other reservoirs.

Number	Scoping Comment
WM30	Delay the drawdown (at Weiss Lake) until October 1st and raise the pool faster in the spring. Prefer a minimum drawdown; for example, no drawdown for two years, and then the third year, draw it down so people can get on land and work on their docks and perform other maintenance.
WM31	Increase the winter pool level for Logan Martin by 2 feet to elevation 462. The 2 extra feet will have enormous benefits to the many people that reside on the lake and for non-property owners that use the lake for recreational purposes year-round. Logan Martin has many large shallow areas that are inaccessible when the lake is at winter pool level of 460 ft. Raising the winter level by 2 ft. will allow most of these shallow areas to be used year-round by the residents that call Lake Logan Martin home.
WM32	Consider increasing the Allatoona Lake summer pool by two feet and reducing the drawdown for the winter pool to eight feet.
WM33	Individual expressed concern about flooding impacts experienced two years ago (2016) at Weiss Lake. Water was not released quickly enough from Weiss Dam to preclude flooding.
WM34	In April 2017, Weiss Lake was dropped two and a half feet in the middle of the spawning season for crappie, exposing all the fish eggs. This drawdown also occurred during a fishing tournament, causing economic impact. Concern was expressed about APC lake management policies and practices during fish spawning season each year.
WM35	APC should publish a schedule during fall drawdown so that the public knows when the pool will be dropped to various levels of drawdown and can better prepare to minimize impacts on their activities.
WM36	Weiss Lake storage is being impacted by heavy siltation from tributaries. Recommend consideration of dredging to restore storage capacity and access to restricted areas on the lake.
WM37	Raise the winter pool on Weiss Lake if it does not increase flood risk in the winter.
WM38	Commenter expressed concern about the amount of water that would be drawn out of Allatoona Lake and the impact on downstream flow (at Weiss Lake), both the quality and the quantity of the flow of the Coosa River, and how may affect the area economically and environmentally.
WM39	Increases in water withdrawals at Allatoona Lake should be matched with increase in wastewater returns.
WM40	We should not cause adverse effects to one lake (Weiss) and the Coosa River by making additional lakes (presumed reference to Richland Creek Reservoir).
WM41	Do not concur with Georgia taking more water and affecting the water quality and lake levels in Alabama lakes.
WM42	Since the pool level on Neely Henry is staying higher in the winter, more weeds and grasses are present. The tall grass is a deterrent for swimmers and boat propellers. Consider lowering the pool by an additional amount for a brief period in the winter months to deter weed growth.
WM43	Allatoona Lake levels have been raised for recreation, resulting in reduced Coosa River flows. Historically, flows have been dropping for the last 20 years, under all conditions.
WM44	Increase the winter pool level at Logan Martin Lake to elevation 462 feet.
WM45	Raise water levels in Allatoona Lake during all months. Store additional water during winter months to meet the water needs of both Georgia and Alabama. Maintain or raise the full pool levels during peak recreation months.

Number	Scoping Comment
WM46	Concern expressed that Allatoona Lake levels could be lower as much as six additional feet because of the request for additional water supply withdrawals.
WM47	Maintain a more consistent level at Allatoona Lake instead of drawing down during the winter months.
WM48	Implement a dredging operation year-round. This will allow for more storage capacity to be used for flood control, plus generation, water supply, and recreation.
WM49	The recent change at Allatoona Lake to move the planned drawdown to October 1 was a good move. Move the drawdown to a later date near year's end.
WM50	Consider leaving Allatoona Lake at full pool year-round or at least only draw down between January and March.
WM51	The ACT study to reallocate Allatoona's watershed is an ill-advised idea. What is needed is another reservoir between Allatoona and Weiss that can catch Allatoona's winter run-off and mid-season releases in greater abundance and better regulate the rest of the system downstream. Reapportionment or reallocation of storage for water supply is a temporary stop gap measure.
WM52	Maintain the same pool level at Weiss Lake year-round. This would improve fish habitat, boating, and property values.
WM53	Support the APC proposal to lower the top of the flood storage to 473.5 in lieu of 477. APC has continued to improve flood management techniques technologies and there have been no excursions into the flood easement in more than two years even with starting lake levels near full pool and sustained heavy rains upstream.
WM54	Consider changes to the Zone 4, as presented in Section 7 of the current Water Control Manual for Allatoona Lake, while holding the other zones as currently ordered by the water control manual published in 2015 to compensate for any additional water diversion from the lake and/or Etowah River.
WM55	Consider implementing a higher low pool elevation for the duration of the extended window if USACE proposes to change the full pool window via an earlier drawdown or later refill. If USACE proposes to implement a new lower low pool elevation, then it should only occur during a shorter window (i.e. the full pool lasts longer).
WM56	Allatoona Lake is drawn down 17 feet below summer pool level at the lowest point in winter. Do not allow the lake to be drawn down any lower than that. The Allatoona Yacht Club has big docks and big boats and floating houses. They must get pushed further into the lake when water level goes down. If the water level was to go down further than the 17 feet, we could have boats and floating houses sitting on rocks. We would have to push them out further, which would decrease the enjoyment of our members. We just want to make sure the water levels do not go any lower in the winter than it does now.
WM57	Recommend dropping Allatoona Lake by no more than 12 feet in the winter months.
WM58	Consider increasing Allatoona Lake levels by two to three feet year-round. USACE should be able to continue to operate for flood risk management and keep the lake higher for recreational use.

Number	Scoping Comment	
Water Qu	Water Quality (WQ)	
WQ1	Recommend that USACE ensure that the Water Control Manual operations meet water quality standards including downstream uses. (USEPA)	
WQ2	Downstream impacts to water quality in Alabama are of particular concern. USACE has an obligation under the Clean Water Act and its own regulations and guidance to protect downstream water quality. Historic measurements of chlorophyll <i>a</i> in Weiss Lake show that the nutrient standards for Weiss Lake have been exceeded during several years, particularly during drought years. In 2004, the USEPA approved a Total Maximum Daily Load (TMDL) for nutrients in Weiss Lake. USEPA determined the source of the nutrients and eutrophication levels in Weiss Lake were nonpoint source discharges originating mostly in Georgia. Four reservoirs in the Coosa River downstream from Weiss Lake (Lake Neely Henry, Lake Logan Martin, Lay Lake, and Lake Mitchell) have also been identified by the Alabama Department of Environmental Management (ADEM) as impaired by nutrients. Decreasing either the amount or quality of inflow from Allatoona to Weiss Lake can only exacerbate the nutrient issues in Weiss Lake, which will in turn deplete DO further, making it more burdensome for APC to ensure DO at or above 4 mg/l in the tailrace at Weiss during generation. The USACE should evaluate whether any water supply operations at Allatoona Lake will interfere with attainment of downstream water quality standards. (APC)	
WQ3	The proposed water supply request (at Allatoona Lake) will further reduce flows in the ACT basin causing a variety of environmental concerns and impacts to the Montgomery Water Works and Sanitary Sewer Board (MWWSSB) and others in Alabama. This harm includes the overall degradation of water quality, impairment of the Montgomery Board's ability to adequately treat wastewater, and impairment of the Board's ability to conduct and rely upon long range planning and analysis. (MWWSSB)	
WQ4	Further reductions in water flow may occur that will further affect the MWWSSB's cost to comply with its National Pollutant Discharge Elimination System (NPDES) permits. (MWWSSB)	
WQ5	Any withdrawn Allatoona water should be returned to the Lake at a higher quality than that withdrawn.	
WQ6	We are especially concerned with how water quality (at Allatoona Lake) may be impacted in the future. The large outflows, inflows, and fluctuations to the lake are all problematic to the quality of the water in the lake. Once the water quality falls apart, all the other authorized purposes of the lake become compromised. It is paramount that the quality of the water be maintained with the limitations of massive inflows and outflows. Any change to the Allatoona Lake, Allatoona Lake water quality (in Allatoona Lake).	
WQ7	Clean water is very important (at Weiss Lake) and must be maintained.	
WQ8	APC cannot be trusted to manage the water (in Weiss Lake) in an environmentally friendly state or we would not be where we are today. APC has allowed raw sewage from the town of Cedar Bluff to be dumped into the lake for years. They know about it, everybody in the area knows about it, and they know it happens when the town sewage system has an overflow.	
WQ9	Have some serious concerns that water quality on Weiss and Neely Henry has dropped tremendously. The serious issues with water quality are due to inadequate flow to Weiss Lake from Georgia reservoirs (Allatoona, Hickory Log, etc.).	
WQ10	Concerned about the pollution entering Weiss Lake from Georgia, including the carpet mills and the other different pollutants coming down the Coosa River into Weiss Lake. This has been a problem for years.	

Number	Scoping Comment
WQ11	Higher winter pool levels at Weiss and Logan Martin will benefit water quality – more water equals dilution of pollution.
WQ12	Individual concerned about water quality at Weiss Lake, specifically warnings to not eat the fish due to high polychlorinated biphenyl (PCB) content and a standing order for "swim at your own risk" due to contamination from a flesh-eating disease that a person got last year. The source of the disease is not clear if the disease is coming from people who are not maintaining their RV (recreational vehicle) disposal tanks on their RV lots. Not clear if this proposal would make conditions worse.
WQ13	Water quality (e-coli) is way out of allowable levels – 400 times allowable levels at Allatoona Lake. The data is available. What is the USACE plan to address this issue?
WQ14	Concerns expressed about the effects of lower water levels in Allatoona Lake on water quality in the lake.
WQ15	Consider assessing the water quality impact to any changes proposed. Like south Florida, if anything catastrophic happens to the waters in Allatoona Lake, the impact will be felt throughout the entire ACT River basin.
WQ16	Water quality on Weiss Lake is the major concern that should be addressed in your study. Water quality will be improved with: 1) more water in the lake, especially in the winter. Winter water level should be raised to 561; 2) no reduction in the easement elevation, as doing so would reduce wetlands that filter water into the lake.
WQ17	Water quality in Allatoona Lake may suffer with longer pool retention, lower flood levels, longer recreation time, and lower "flush" frequency,
Biological Resources (BR)	
BR1	Recommend that USACE provides adequate downstream flows to maintain the physical integrity of the habitat. (USEPA)
BR2	Actively engage the U.S. Fish and Wildlife service on issues related to the protection of threatened and endangered species. (USEPA)
BR3	Reduced outflow from the upstream USACE projects could also impact threatened and endangered species in the Coosa River below Weiss Dam. (APC)
BR4	Protection of fish and other wildlife in the Etowah and Oostanaula Basins is important relative to minimum and maximum flows.
BR5	Concerns expressed about the effects of lower water levels in Allatoona Lake on eagles and osprey.
BR6	A higher winter level at Weiss Lake would benefit Cherokee County along with the surrounding areas by providing a better quality of habitat for both fish and wildlife in and around the lake.
BR7	The Weiss Lake fishery has never recovered after the last drought. The crappie catch has decreased.
BR8	Reduced flows will result in more vegetation encroaching in Weiss Lake and downstream reservoirs, some of which is invasive species. Reduce flows affects some of the protected species as well. Also, when the flow is impacted, it will affect the extent of bacteria in the water.
BR9	Higher winter pool levels at Weiss and Logan Martin will benefit fish and wildlife habitat.
BR10	More water supply withdrawals because of Georgia's request would impact Weiss Lake, causing it to go stagnant and experiencing more fish kills than currently occur, especially during low rainfall periods.

Number	Scoping Comment
BR11	Concerns expressed about the effects of lower water levels in Allatoona Lake on fish habitat in the lake.
BR12	Lower lake levels in Allatoona Lake results in increased temperatures, depletion of oxygen levels in the water, and distress for fish and other aquatic wildlife, perhaps even fish kills. These conditions may also promote algae blooms.
BR13	Do not reduce the flood plain easement at Weiss Lake; it needs to stay at 574 to protect the wetlands.
Recreation Resources (REC)	
REC1	USACE should consider potential impacts to recreation interests downstream as part of any Allatoona water supply analysis. APC's downstream lakes, from Weiss Lake to Jordan Dam, provide valuable recreational opportunities. The recreational value of APC's projects largely depends on elevation and available flows. Increased water supply operations could negatively impact lake elevations and flows, particularly during the peak recreational season. USACE should fully disclose any such potential impacts and any related economic impacts. USACE consideration of recreation impacts should also not favor recreation at Allatoona over recreation at APC's lakes downstream. (APC)
REC2	During winter draw down at Weiss and Logan Martin lakes, many lake access boat ramps are dry and unusable, most coves and creeks are blocked from the river without access due to low water and sedimentation.
REC3	The State's use of "average" water level conditions to present its case is misleading at best and possibly an intentional misrepresentation of facts. Refer to the State's 2013 application as a precedent in reaching this opinion. In that submittal, the State hid the likelihood that Allatoona Lake's recreational season water levels would be decrease by many feet by submitting that "average" conditions would be minimal with hardly any impact on recreational uses. Their latest submittal repeats this misleading pattern and does not identify what the water level drawdowns would be under adverse drought conditions.
REC4	Increase in the winter pool at Logan Martin Lake would provide easier and more frequent access to the lake and would improve the sport fishing at the lake at more desirable fishing times.
REC5	Current Weiss Lake winter pool levels impact boat use and limit access to coves.
REC6	Under current winter pool level condition at Weiss Lake, the three boat ramps that the county operates below the Lock and Dam (Mayo's Bar) are basically inaccessible and unusable.
REC7	Raising winter pool levels at Weiss Lake will make more of the lake accessible, allowing more uses of the lake. Higher winter water levels will introduce more possibilities of waterfowl hunting, increasing visitors to the lake and boosting local businesses and the local economy.
REC8	Raising the winter pool at Logan Martin Lake would provide a better and longer use period for recreational use and a safer experience.
REC9	The Cherokee Allatoona Waterfall area (a poorly managed USACE "party" area), is worse during higher lake levels. Seeking closure of this area until USACE can manage/monitor properly with rules and postings, no motors in swim area, no guns, fires, disorderly conduct, trespassing, camping, trash/littering, and drugs. This area could be great with host/manager living there.
Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment					
Socioecor	Socioeconomic Resources (SR)					
SR1	Consider impacts to affected communities including low-income and minority populations. (USEPA)					
SR2	The NEPA analysis requires proper consideration of socio-economic impacts. While the NEPA analysis will require consideration of panoply of Federal laws of which many are directed at underlying environmental impacts, NEPA also requires USACE to consider the socio-economic impacts associated with a proposed action. With the reallocation of storage, the loss of hydropower and related pricing of storage remain important considerations for the scope of the NEPA review for the study of reallocating storage. Because Congress specified that the Allatoona project would generate hydropower, the scope of the NEPA study must include an analysis of impacts associated with the loss of hydropower that will occur with the reallocation of storage. Furthermore, the pricing of storage must at a minimum reflect the loss of the hydropower benefits that are provided by the Allatoona project. The proper scope of socio-economic impacts should specify the amount of OMRR&R expenses which will be borne by water supply and no longer assigned to hydropower. In this regard, the study should recommend the proper adjustment of the cost allocation studies to ensure that joint costs are appropriately shared by the authorized project purposes at Allatoona Lake. (SeFPC)					
SR3	Request a longer season of higher water (at Weiss Lake). Tourism related to the lake is important to Cherokee County.					
SR4	Higher winter pool at Weiss Lake would help small boat navigation and reduce damage to watercraft.					
SR5	Recreation is important, and lower (winter) water levels (at Weiss Lake) and less water supply would impact recreation.					
SR6	Concerned about the effects of lower water levels in Allatoona Lake on use of boat docks and marinas.					
SR7	Concerned about the effects of lower water levels in Allatoona Lake on property values around the lake.					
SR8	Sloughs on Logan Martin Lake are mud flats at winter pool. Increasing the winter pool by two feet would substantially raise property values in these areas.					
SR9	At current winter pool levels, people with four wheelers ride on the Logan Martin Lake bed and stir up/disrupt the lake bed, disrupting property owners and causing environmental damage.					
SR10	Increase in winter pool level at Logan Martin Lake would improve the economy of all the business associated with the lake.					
SR11	Increasing the winter pool level at Weiss Lake would benefit Cherokee County along with the surrounding areas by increasing tourism, recreational activities, and tax revenue.					
SR12	Sufficient flow from Georgia is a concern downstream in Alabama. Gadsden is so dependent economically on the Coosa River, with fishing and the tournaments and the businesses. Reduced flows would have an enormous impact economically and the quality of the water would be affected.					
SR13	Higher winter pool levels in Weiss Lake would improve conditions for businesses in Centre and increase business revenue and tax revenue. Full year recreation access would be a significant benefit to local businesses.					
SR14	Reduced flows to Weiss Lake resulting from increased upstream withdrawals at Allatoona Lake would have a negative effect on safe use of the lake, community water supplies, tourism, and the local economy in general.					
SR15	Cherokee County (Alabama) relies on revenue collected through tourism. Weiss Lake and its resources need to be protected.					

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment					
SR16	Concern expressed about potential effects of increased withdrawals at Allatoona Lake on lake levels, property values, and recreation on the lake.					
SR17	The proposed plan to take water from Allatoona Lake and lower lake levels will have far-reaching economic impacts in this area.					
SR18	Further lowering lake levels at Allatoona Lake because of increased water supply withdrawals would further increase the adverse impacts on boat access and property values around the lake.					
SR19	Further reduction in Allatoona Lake levels will impact the economics of the region. Less water means less recreation, impacting several counties surrounding the lake.					
SR20	Modification of the winter pool level at Logan Martin Lake would have a decidedly positive impact on property values, as many buildable lots and existing homes would gain access to year-round water.					
Other Env	vironmental Resources (OR)					
OR1	Need a plan better control rubbish, trash, and litter that gets dumped into Weiss Lake.					
Data/Mo	dels and Studies (DS)					
DS1	Recommend further consultation with USEPA regarding modeling efforts prior to the development of the SEIS. (USEPA)					
DS2	Georgia's ResSim model analysis should be reconstructed to include drought and non-drought runs. No changes from the "made inflow" concept seem to have been incorporated into Dr. Zeng's model analysis, although this cannot be determined absent Georgia EPD's model or their supporting data. Alabama hereby requests the opportunity to attempt to re-create Dr. Zeng's results when accounting for these various withdrawals and discharges. (ALOWR)					
DS3	Georgia's model analysis in support of their water supply request does not account for reduced state line flow from Georgia to Alabama. Dr. Zeng's analysis attempts to portray how little the state line flow from Georgia to Alabama would be decreased by its March 2018 water supply request, measuring the decrease in cubic feet/second and then providing the long-term average flow at the state line for context. However, this calculation is misleading in that the long-term average flow rate is not representative of flow rate during a serious drought. USACE needs to carefully create the proper baseline conditions and scenarios to model in order to properly evaluate Georgia's water supply request and its effect on the flows at the Alabama-Georgia state line. These conditions must be shared with Alabama to ensure that the critical issues identified above are properly considered. (ALOWR)					
DS4	APC understands that USACE intends to include the new Richland Creek Dam as either part of the NEPA baseline or the USACE impact analysis. USACE should clearly explain how it intends to do so. Richland Creek operations in combination with Allatoona water supply operations could exacerbate downstream harm to Weiss Lake and the Coosa River in Alabama. USACE must thoroughly consider any such impacts. (APC)					
DS5	Closely examine the downstream water quality issues identified by the MWWSSB with reliable modeling and tools and fully evaluate the impacts of the pending water supply request. (MWWSSB)					
DS6	Please ensure that modeling considers the actual withdrawals by CCMWA in developing a baseline for comparison.					

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Acronyms and Abbreviations

ACT – Alabama-Coosa-Tallapoosa
ADEM – Alabama Department of Environmental Management
ALOWR – Alabama Office of Water Resources
APC - Alabama Power Company
CCMWA – Cobb County-Marietta Water Authority
DO – Dissolved Oxygen
DOJ – U.S. Department of Justice
EA – Environmental Assessment
EIS – Environmental Impact Statement
FERC – Federal Energy Regulatory Commission
GAEPD – Georgia Environmental Protection Division
M&I – municipal and industrial
mgd – million gallons per day
MNGWPD – Metropolitan North Georgia Water Planning District
MWWSSB – Montgomery Water Works and Sanitary Sewer Board
NEPA – National Environmental Policy Act
NPDES – National Pollutant Discharge Elimination System
PCB – polychlorinated biphenyl
RV – recreational vehicle
SeFPC – Southeastern Federal Power Customers, Inc.
SEIS – Supplemental Environmental Impact Statement
SEPA – Southeastern Power Administration
TMDL – Total Maximum Daily Load
USACE – U.S. Army Corps of Engineers

USEPA – U.S. Environmental Protection Agency WSA – Water Supply Act (of 1958) WSP - Water Supply Providers (Georgia) Page intentionally blank

Attachment 2. Agency and Public Notifications



US Army Corps of Engineers® Mobile District Release of the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona-Coosa Reallocation Study in the Alabama-Coosa-Tallapoosa River Basin

November 2019

The U.S. Army Corps of Engineers (USACE), Mobile District, has officially released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Control Manuals in the Alabama-Coosa-Tallapoosa (ACT) River Basin (also known as the Allatoona-Coosa Reallocation Study or ACR Study). The ACR Study, initiated in April 2018, addresses two specific actions that were deferred from consideration during the process to update the Master Water Control Manual (Master Manual) for the ACT River Basin pending further detailed study.

USACE approved the updated ACT River Basin Master Water Control Manual and signed the Record of Decision on the Final Environmental Impact Statement in May 2015. The ACT River Basin Master Manual, and associated individual project water control manuals, guides operation of USACE reservoirs for multiple federally authorized purposes and certain Alabama Power Company (APC) reservoirs that were constructed to support federally authorized flood risk management and navigation purposes.

The two deferred actions that have been addressed by the ACR Study Draft FR/SEIS are: 1) a pending request from the State of Georgia for USACE to reallocate multipurpose reservoir storage in Allatoona Lake to water supply to meet future demands in the region; and 2) a request from APC to modify currently approved flood operations at their Weiss and Logan Martin reservoir projects.

The Draft FR/SEIS evaluated multiple alternatives to address Georgia's water supply request at Allatoona Lake and APC's request to modify current flood operations at the Weiss and Logan Martin reservoir projects, both as individual requests and in various combinations. Based upon legal, policy, engineering, economic, and environmental considerations, USACE has identified a Tentatively Selected Plan to address these requests.

The Draft FR/SEIS and appendices are available to the public for review in the following formats:

 Online as PDF documents at www.sam.usace. army.mil/Missions/Planning-Environmental/ Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/Document-Library; As a CD when requested in writing to Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mobile, AL 36628

Public Review and Comment

USACE invites all interested parties to submit comments on the Draft FR/SEIS. The public comment period will commence with the publication of the Notice of Availability (NOA) of the Draft FR/SEIS in the Federal Register, which is expected on November 15, 2019, and will end 45 days after publication of the NOA. Comments may be submitted via the following methods:

- Onsite at open house style public meetings by comment cards or verbally to a court reporter;
- Digitally by email to act-acr@usace.army.mil;
- By letter addressed to Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mobile, AL 36628.

Open Houses

Open house public meetings will be held at the following locations and times:

- Monday, December 9, 2019 4:00 pm-8:00 pm EST Acworth Community Center 4361 Cherokee Street Acworth, GA 30101
- Tuesday, December 10, 2019 4:00 pm-8:00 pm EST Forum River Civic Center: Berry/Shorter Room 301 Tribune Street Rome, GA 30161
- Wednesday, December 11, 2019 4:00 pm-8:00 pm CST The Pitman Theater 629 Broad Street Gadsden, AL 35901
- **Thursday, December 12, 2019** 4:00 pm-8:00 pm CST Friends on Eighth 109 8th Avenue SW Childersburg, AL 35044

1899 Powers Ferry Road, Suite 400 Atlanta, GA 30339

The information contained herein is for general informational purposes only and is subject to change.



Expected Timeline for the Allatoona-Coosa Reallocation Study FR/SEIS:

April 2018: USACE published Notice of Intent to prepare Draft Supplemental EIS

August 2018: Scoping meetings

2018

September 2018: Final Scoping Report released

November 2019: Draft FR/SEIS published

December 2019: Draft FR/SEIS public meetings

December 2019: Draft FR/SEIS public comment period ends

■ Fall 2020: Publish Final FR/SEIS

 Spring 2021: Record of Decision signed and WCM updates approved.

For the most recent updates on the project, visit

www.sam.usace.army.mil/Missions/Planning-Environmental/Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals

US Army Corps of Engineers



News Release

USACE Mobile District Announces Public Meetings for ACT River Basin

Published Nov. 15, 2019

MOBILE, Ala. --

The U.S. Army Corps of Engineers Mobile District is scheduled to host four open-house public meetings Dec. 9 – Dec. 12, 2019, at various locations throughout the Alabama-Coosa-Tallapoosa River Basin in Georgia and Alabama. This is part of the public review and comment process for the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Alabama and Georgia, to be released on Nov. 15, 2019.

The Draft FR/SEIS and appendices will be available for download at <u>go.usa.gov/xVHN9</u> starting Nov. 15, 2019. The digitized files on compact discs may be requested by writing to:

Commander, USACE Mobile District

Attn: PD-EI (ACT-ACR DSEIS)

P.O. Box 2288

Mobile, AL 36628

"We invite the community to attend our ACT public meetings, which will provide information on the Feasibility Study and Draft Supplemental Environmental Impact Statement" said Cesar Yabor, chief of Public Affairs, USACE Mobile District. "The Corps team looks forward to answering any questions the public may have."

The open-house public meetings will be held at the following locations, dates and times:

Monday, Dec. 9	Tuesday, Dec. 10
4:00 – 8:00 p.m. EST	4:00 – 8:00 p.m. EST

Acworth Community Center	Forum River Civic Center / Berry Shorter Room
4361 Cherokee Street	301 Tribune Street
Acworth, GA 30101	Rome, GA 30161
(770) 917-1234	(706) 291-5281
Wednesday, Dec. 11	Thursday, Dec. 12
4:00 – 8:00 p.m. CST	4:00 – 8:00 p.m. CST
The Pitman Theater	Friends on Eighth
629 Broad Street	109 8th Avenue SW
Gadsden, AL 35901	Childersburg, AL 35044
(265) 549-4740	(205) 296-2397

Comments should be received no later than **Dec. 30, 2019**, by submission to one of the following:

- Onsite at the public meetings, via comment forms or the attending court reporter
- By e-mail to: <u>ACT-ACR@usace.army.mil</u>
- By letter to:

Commander, USACE Mobile District Attn:

PD-EI (ACT-ACR DSEIS)

P.O. Box 2288 Mobile, AL 36628

"The FR/DSEIS presents the results of USACE's environmental analysis for our Tentatively Selected Plan for a potential water supply reallocation in Allatoona Lake," said Yabor. "It also includes proposed revisions to flood operations for the two Alabama Power Company reservoir projects at Weiss Dam and Lake and Logan Martin Dam and Lake. The Tentatively Selected Plan includes the following changes:

Allatoona Lake

- Water Supply reallocation of 33, 872 acres
- Raise Summer guide curve from 840 feet to 841 feet
- Raise Winter guide curve from 823 feet to 824.5 feet

Weiss Lake

- Raise Winter level from 558 feet to 561 feet
- Lower Top of Flood Pool from 574 feet to 572 feet
- Modify Surcharge Operation

Logan Martin Lake

- Raise Winter level from 460 feet to 462 feet
- Lower Top of Flood Pool from 477 feet to 473.5 feet
- Modify Surcharge Operation

For more information, contact (251) 690-2505 or visit: <u>go.usa.gov/xVHN9</u>.

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With an area of operation across Alabama, Mississippi, Georgia, and northern Florida, and a vast military region that includes operations across Central and South America, the Mobile District's award- winning teams of engineering, construction, regulatory and emergency management professionals are nationally recognized for their leadership in delivery of the U.S. Army Corps of Engineers' civil works and military programs missions to the Nation.

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Contact

Public Affairs 251-690-2505 CESAM-PA@usace.army.mil 109 Saint Joseph Street, Mobile, AL 36608 Cesar Yabor 251-690-2505 Cesar.Yabor@usace.army.mil 109 Saint Joseph Street, Mobile, AL 36608

Release no. 19-048



Abstract: Section 3 of the Natural Gas Act (NGA) (Pub. L. 75–688) (15 U.S.C. 717–717w) provides, in part, that . . . no person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured and order from the Commission authorizing it to do so. The 1992 amendments to Section 3 of the NGA concern importation or exportation

from/to a nation which has a free trade agreement with the United States, and requires that such importation or exportation: (1) Shall be deemed to be a first sale, *i.e.*, not a sale for a resale, and (2) Shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay.

With the ratification of the North American Free Trade Agreement and the Canadian Free Trade Agreement, the Federal regulatory focus on construction, operation, and siting of import and export facilities increased significantly.

*Estimate of Annual Burden.*² The Commission estimates the annual public reporting burden and cost³ for the information collection as:

FERC-539,	GAS PIPELINE	CERTIFICATES:	IMPORT &	EXPORT	RELATED	APPLICATIONS
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Number of respondents	Number of responses per respondent	Total number of responses	Average burden hours & average cost per response (\$)	Total annual burden hours & total annual cost (\$)	Cost per respondent (\$)
(1)	(2)	(1) × (2) = (3)	(4)	$(3) \times (4) = (5)$	(5) ÷ (1) = (6)
6	2	12	15 hours; \$1,200	180 hours; \$14,400	\$2,400

Comments: Comments are invited on: (1) Whether the collection of information is necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency's estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility and clarity of the information collection; and (4) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

Dated: November 5, 2019.

Kimberly D. Bose,

Secretary.

[FR Doc. 2019-24568 Filed 11-14-19; 8:45 am] BILLING CODE 6717-01-P

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-9047-9]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information 202-564–5632 or https://www.epa.gov/nepa/. Weekly receipt of Environmental Impact Statements

Filed 11/04/2019 10 a.m. ET Through 11/11/2019 10 a.m. ET Pursuant to 40 CFR 1506.9.

Notice

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: https:// cdxnodengn.epa.gov/cdx-enepa-public/ action/eis/search.

- EIS No. 20190270, Final, NMFS, LA, Reduce the Incidental Bycatch and Mortality of Sea Turtles in the Southeastern U.S. Shrimp Fisheries, Review Period Ends: 12/16/2019, Contact: Michael Barnette 727-551-5794
- EIS No. 20190271, Final, USACE, CA, Lower Elkhorn Basin Levee Setback Project, Review Period Ends: 12/16/ 2019, Contact: Tanis Toland 916–557– 6717
- EIS No. 20190272, Draft Supplement, USACE, AL, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Comment Period Ends: 12/30/2019, Contact: Jennifer Jacobson 251-690-2724

Dated: November 12, 2019.

Robert Tomiak,

Director, Office of Federal Activities. [FR Doc. 2019-24810 Filed 11-14-19; 8:45 am]

BILLING CODE 6560-50-P

FEDERAL RESERVE SYSTEM

Formations of, Acquisitions by, and Mergers of Bank Holding Companies

The companies listed in this notice have applied to the Board for approval, pursuant to the Bank Holding Company Act of 1956 (12 U.S.C. 1841 et seq.) (BHC Act), Regulation Y (12 CFR part 225), and all other applicable statutes and regulations to become a bank holding company and/or to acquire the assets or the ownership of, control of, or the power to vote shares of a bank or bank holding company and all of the banks and nonbanking companies owned by the bank holding company, including the companies listed below.

The applications listed below, as well as other related filings required by the Board, if any, are available for immediate inspection at the Federal Reserve Bank indicated. The applications will also be available for inspection at the offices of the Board of Governors. Interested persons may express their views in writing on the standards enumerated in the BHC Act (12 U.S.C. 1842(c)). If the proposal also involves the acquisition of a nonbanking company, the review also includes whether the acquisition of the nonbanking company complies with the standards in section 4 of the BHC Act (12 U.S.C. 1843), and interested persons may express their views in writing on the standards enumerated in section 4. Unless otherwise noted, nonbanking activities will be conducted throughout the United States.

² Burden is defined as the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. See 5 CFR

¹³²⁰ for additional information on the definition of information collection burden.

³ The Commission staff estimates that industry is similarly situated in terms of hourly cost (for wages

plus benefits). Based on the Commission's FY (Fiscal Year) 2019 average cost (for wages plus benefits). \$80.00/hour is used.

8000	Legals
4M2ZU66E3YUJ05955	
07 MITSUBISHI	GALANT
4A3AB36F07E059796	DO CDODT
	RU SPURT
1A4LX41G33U056677	OTEANDER
03 NISSAN	ALTIMA
1N4AL11D63C310326	
09 NISSAN	MAXIMA
1N4AA51E69C802269	
12 NISSAN MAXIMA	
UN8A708T04W206841	MORANO
01 NISSAN PATHFINDER	2
JN8DR07X71W502601	
97 NISSAN PICKUP	
1N6SD16S8VC378209	
12 NISSAN SENTRA	
3N1CN7AP0CL 898371	
01 OLDS ALERO 1G3NL5	2T31C182682
92 OLDS	CUTLASS
1G3AL54N0N6373073	
82 PONTIAC FIREBIRD	
IG2AW8/H0CL534/03	
1C07557N17E115007	AUKA
98 SATURN SC2 1G87G12	73W7240371
00 SATURN SLI 1G8ZH52	82YZ110579
03 TOYOTA	CAMRY
4T1BE32K53U658237	
06 TOYOTA	CAMRY
411BE32K06U12/130	CAMPY
	CAMRI
07 WABASH	TRAILER
1JJV532W77L54065	
14 YONG TRAILER	4X8 UTIL.
L4WC1H817EA051825	
11:8,15-2019	

MDJ-3410

GPN-17 PUBLIC AUCTION On November 22, 2019 at 12:30 pm or thereafter, this auction will be held at thereafter, this auction will be held at www.selfstorageauction.com for Ken-nesaw Self Storage(770)422-412 the property will auction the contents of the following units to satisfy the own-er's lien as provided for by the Georgia Self Storage Facility Act Georgia Code 104-210.

10-4-210. All units will be awarded to the highest bidder. Cash will be the only form of acceptable payment for winning bids. Kennesaw Self Storage reserves the right to withdraw any unit from sale. Any RV, Boat, or other type of Motor Vehicles are sold "AS IS", for 'PARTS ONLY', no titles or registrations are given.

GOLL , ... GO22 - Heather Harris Bed frame, toys, crockpot, kitchen-ware, boxes, bags, side tables, lamp, bins, pictures, toy barn, housewares. 11:8,15-2019

MDJ-3412

GPN17 GPN17 NOTICE OF ABANDONED VEHICLES Pursuant to OCGA Subsection 40-11-2, HOWARD'S WRECKER SERVICE, through its agents, states that the fol-lowing vehicles are abandoned and will be sold at a later date if not picked up as stated.

as stated. 465 Ventura Place, Smyrna, GA 30080 1984 Pontiac Firebird 1GZA58719CL552888 No Tag 1638 Reflections Trail SW 11:8,15-2019

MDJ-3422

MDJ-3422 GPN-20 PETITION TO QUIET TITLE Comcast Cable Communications, LLC V. All that track or parcel of land lying and being in Land Lot 1137 of the 16th District, 2nd Section, Cobb County, Georgia, known as 111 Fairview Street, Marietta, Georgia; Tax Parcel No. 16113700750; All persons known or un-known in the world claiming interest in 111 Fairview Street, Marietta, Geor-gia.

CIVIL ACTION FILE NO. 19103375 SUPERIOR COURT OF COBB COUN-

Civil ACTION FILE NO. 19103375 SUPERIOR COURT OF COBB COUN-TY PETITIONER: Comcast Cable Com-munications, LLC RESPONDENTS: All that track or parcel of land lying and being in Land Lot 1137 of the 16th District, 2nd Sec-tion, Cobb County, Georgia, known as 111 Fairview Street, Marietta, Geor-gia; Tax Parcel No. 16113700750; All persons known or unknown in the world claiming interest in 111 Fairview Street, Marietta, Georgia Pursuant to Order of Superior Court of Cobb County Judge Mary Staley Clark, dated November 4, 2019, you are here-by notified that Comcast Cable Com-munications, LLC ("Petitioner") filed a Petition to Quiet Title (Quia Timet) Against All the World with the above-referenced style on May 8, 2019, in the Superior Court of Cobb County. The Petition seeks to quiet title to the ref-erenced property that is the subject of the Petition. You are hereby com-manded to be and appear at the Court in this action within 30 days of the date of the Courts November 4, 2019 Order for Service by Publication and are en-titled to file any pleading you desire in response to the Petition within 60 days of the date of the Courts November 4, 2019 Order for Service by Publication, by serving said pleading on Petitioner's Bird LLP, 1201 W. Peachtree St., At-lanta, GA 30309, and filing said plead-ing with the Clerk of the Superior Court of Cobb County. A hearing on this matter will be held before the Court-Appointed Special Master, J. Michael Treadaway, at 9:00 a.m. on January 9, 2020, at the offices of Treadaway & Treadaway, 399 Wash-ington Avenue, NE, Marietta, Georgia 30060. This 4th day of November, 2019. **WITNESS the Honorable**

8000 8000 Legals REQUIRED R/W: 0.788 acres of land; and certain easement rights PROPERTY OWNERS: Morning View Baptist Church Inc. of Acworth, GA; Bank of the Ozarks; Cobb County Water System; Tax Com-missioner of Cobb County. All that tract or parcel of land lying and being in Land Lot 78 of Land Dis-trict 20 of Cobb County, Georgia, being more particularly described as follows:

and being in Land Lor /8 or Land Dis-tricit 20 of cobb County, Georgia, being more particularly described as follows: <u>Right of Way</u> BEGINNING at the point of intersection on the existing south-western right of way line of SR 92 with the northwestern property line of the condemnees, said point being 33.37 feet right of and opposite Station 270-f88.25 on the construction centerline of SR 92 on Georgia Highway Project No. CSSTP-0006-00(866); running thence N 31°24'02.0" E a distance of 481.57 feet to a point 51.24 feet right of and opposite station 275+49.81 on said construction centerline laid out for SR 92; thence N 88°57'07.0" E a distance of 18.96 feet to a point 185.00 feet right of and opposite station 276+35.69 on said construction centerline laid out for SR 92; thence S 76°05'33.1" W a distance of 78.09 feet to a point 150.00 feet right of and opposite station 275+00.00 on said construction centerline laid out for SR 92; thence S 81°50'55.6" W a distance of 78.010 feet to a point 90.00 feet right of and opposite station 275+30.00 on said construction centerline laid out for SR 92; thence S 32°52'23.6" W a distance of 235.05 feet to a point 85.00 feet right of and opposite station 275+15.000 on said construc-tion centerline laid out for SR 92; thence S 32°52'23.4". W a distance of 235.05 feet to a point 85.00 feet right of and opposite station 275+15.000 on said construc-tion centerline laid out for SR 92; thence S 32°26'4.2" E a distance of 96.18 feet to a point 170.00 feet right of and opposite station 272+15.00 on said construction centerline laid out for SR 92; thence S 31°32'15.4" W a distance of 51.76 feet to a point 170.00 feet right of and opposite station 272+70.00 on said construction centerline laid out for SR 92; thence S 31°32'15.4" W a distance of 51.26.9 feet back to the point of BE-GINNING. Said described land sensy the required right of way and as shown described within on the attached plats marked Annex 1-A. The title, ostate or interest in the above described lands, required by cond

on March 22, 2018; Sheet No. 70 on Au-gust 15, 2018 and attached hereto as Annex 1-A. Driveway Easement BEGINNING at a point 85 feet right of and opposite Sta-tion 273+15.00 on the construction cen-terline of SR 92 on Georgia Highway Project No. CSSTP-0006-00(866); run-ning thence N 32*22'3.6" E a distance of 25.01 feet to a point 85.53 feet right of and opposite station 273+40.00 on soid construction centerline laid out for SR 92; thence S 8*20'44.4" E a dis-tance of 36.47 feet to a point 122.00 feet right of and opposite station 273+40.00 on said construction centerline laid out for SR 92; thence S 31*39'15.6" W a dis-tance of 36.4.59 feet to a point 122.00 feet right of and opposite station 273+40.00 on said construction centerline laid out for SR 92; thence S 31*39'15.6" W a dis-tance of 44.59 feet to a point 122.00 feet right of and opposite station 272+95.41 on said construction centerline laid out for SR 92; thence N 30*26'54.2" W a dis-tance of 4.87 feet back to the point of BEGINNING. Said described land be-ing a temporary easement for the construction of a driveway and is shown as described within on the dt-tached plats marked Annex 1-A. A temporary easement is condemned for the right to construct a driveway purposes. Said easement will expire on August 1, 2030, and is shown as described within on the attached plats marked Annex 1-A. A. Upon completion of this project, the driveway will remain in place for use by the condemnees. **11:15,22-2019**

by the condemnees. 11:15,22-2019

MDJ-3426

MDJ-3426 GPN-14 CITATION IN THE SUPERIOR COURT OF COBB COUNTY, GEORGIA DEPARTMENT OF TRANSPORTATION V5. 0.452 acres of land; and certain ease-ment rights; and Tax Four Points Church Incorporated; Highland Com-mercial Bank; Commissioner of Cobb County, individually The said named persons and any and all other persons known and unknown claiming any right, tille, power, inter-est, ownership, equity, claim or de-mand in and to the lands hereinafter described, and all occupants, tenants, lessees, licensees and all holders, own-ers and users of ways and easements in, across, over and under the provi-sions of the Official Code of Georgia Annotated Sections 32-34 through 32-3-19, providing for the exercise of the power of eminent domain by the State of Georgia, or any of its subdivisions, or by any county of such State, as fol-lows: That the above stated case, being a condemnation in rem against the prop-erty hereinafter described, was filed in said Court on the 14th day of October, 2019; That, in accordance with provi-sions of the aforesaid Official Code, a Declaration of Taking, duly authorized and properly executed as provided by the Official Code, has been made and filed in soid case, declaring the neces-

8000Legals $\delta^{9^\circ}57^{\circ}01.7"$ E a distance of 120.02 feet to
a point 80.00 feet left of and opposite
station 252+00.00 on said construction
centerline laid out for SR 92; thence N
 $\delta^{9^\circ}22^{\circ}32.7"$ E a distance of 170.50 feet to
a point 80.00 feet left of and opposite
station 253+70.50 on said construction
centerline laid out for SR 92; thence N
55^{\circ}20^{\circ}54.2" E a distance of 77.71 feet to
a point 71.00 feet left of and opposite
station 254+72.50 on said construction
centerline laid out for SR 92; thence N
45^{\circ}22^{\circ}32.7" E a distance of 77.18 feet to
a point 71.00 feet left of and opposite
station 254+427.50 on said construction
centerline laid out for SR 92; thence N
45^{\circ}25^{\circ}563.7" E a distance of 17.48 feet to
a point 65.00 feet left of and opposite
station 256+15.21 on said construction
centerline laid out for SR 92; thence N
50^{\circ}56^{\circ}05.7" E a distance of 15.62 feet to
a point 65.00 feet left of and opposite
station 256+20.95 on said construction
centerline laid out for SR 92; thence s
 $\delta^{5}474.36."$ E a distance of 15.62 feet to
a point 60.01 feet left of and opposite
station 256+20.95 on said construction
centerline laid out for SR 92; thence s
 $\delta^{5}474.37."$ W) to the point 49.96 feet
left of and opposite station 256+37.37" W) to the point 49.96 feet
left of and opposite station 255+37.39
on said construction centerline laid out
for SR 92; thence s 46'32'32.5" W a distance of 106.209 feet on a bearing of 5
45'347'33.7" W) to the point 49.96 feet
left of and opposite station 255+10.209 feet on a bearing of 5
45'347'33.7" W) to the point 49.96 feet
left of and opposite station 255+10.209 feet on a bearing of 5
45'347'33.7" W) to the point 49.96 feet
left of and opposite station 255+10.200.7" E a distance of 106.209 feet on a bearing of 5
45'347'33.7" W) to the point 49.96 feet
left of an

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Cube Cube Cube Cube Cube Cube Cube Cube

Cub Cube

Drivewa Easement Beginning at a point 80.00 feet left of and opposite Station 252+45.00 on the construction centerline of SR 92 on Georgia Highway Project No. CSSTP-0006-00(866); running thence N 43° 37'27.3" W a distance of 20.00 feet to a point 100.00 feet left of and opposite station 252+45.00 on said construction centerline laid out for SR 92; thence N 46°22'32.7" E a distance of 74.00 feet to a point 100.00 feet left of and opposite station 253+19.00 on said construction centerline laid out for SR 92; thence S 43°37'27.3" E a distance of 20.00 feet to a point 80.00 feet left of and opposite station 253+19.00 on said construction centerline laid out for SR 92; thence S 43°37'27.3" E a distance of 74.00 feet to a point 80.00 feet left of and opposite station 253+19.00 on said construction centerline laid out for SR 92; thence S 46°22'32.7" W a distance of 74.00 feet back to the point of beginning. A temporary easement for the right to construct a driveway to connect the newly constructed road and right of vay to the condemnees remaining land for driveway purposes. Said easement will expire on January 1, 2030, and is shown as described within on the dri-completion of this project, the drive-way will remain in place for use by the condemnees. 11:15,22-2019 Driveway Easement Beginning at a point 80.00 feet left of

condemnees.

11:15,22-2019

11:15,22-2019 MDJ-3427 GPN-14 CITATION IN THE SUPERIOR COURT OF COBB COUNTY GEORGIA DEPARTMENT OF TRANSPORTATION VS. 0.082 acres of land; and Damian Marcel Pressley; Pennymac Loan Services, LLC; Mortgage Electronic Registration Systems, Inc.; Tax Commissioner of Cobb County, individually The said named persons and any and and other persons known and unknown claiming any right, title, power, inter-est, ownership, equity, claim or de-mand in and to the lands hereinafter described, and all occupants, tenants, lessees, licensees and all holders, own-ers and users of ways and easements in, across, over and under said land are hereby notified, under the provi-sions of the Official Code of Georgia Annotated Sections 32-3-4 through 32-3-19, providing for the exercise of the power of eminent domain by the State of Georgia, or any of its subdivisions, or by any county of such State, as fol-lows: That the above stated case, being a

of Georgia, or any of its subdivisions, or by any county of such State, as fol-lows: That the above stated case, being a condemnation in rem against the prop-erty hereinafter described, was filed in said Court on the 14th day of October, 2017; That, in accordance with provi-sions of the aforesaid Official Cade, a Declaration of Taking, duly authorized and properly executed as provided by the Official Cade, has been made and filed in said case, declaring the neces-sity for and exercising the power of taking the said described lands for State-aid public road purposes, thereby vesting the title to same in the Depart-ment of Transportation; and, in pur-suance of such authority, the Depart-ment of Transportation has deposited with the Clerk of the Superior Court of said County \$73,400.00 as the iust com-pensation for the said lands described; and all persons claiming such fund or any interest therein, are hereby re-quired to make known their claims to the Court; In accordance with the pro-visions of the Official Cade of Georgia Annotated, the plaintiff-Condemnor has prayed the Court for Immediate posquired to make known their claims to the Court; In accordance with the pro-visions of the Official Code of Georgia Annotated, the plaintiff-Condemonor has prayed the Court for Immediate pos-session of said property, and all per-sons having any interest in or claim against such property, as above set forth, are required by the Order of the Judge of said Court to surrender pos-session of the property to the Depart-ment of Transportation no later than 30 days from filing of the Declaration of Taking. That in accordance with the Official Code of Georgia Annotated Section 32-3-13 through 32-3-19, if the owner, or any of the owners, or any person having a claim against or inter-est in said property, shall be dissatis-fied with the compensation, as estimat-ed in the Declaration of Taking and de-posited in Court, such person or per-sons, or any of them, shall have the right, at any time subsequent to the fil-ing of the Declaration and the deposit of the fund into Court but not later than 30 days following the date of ser-vice as provided for in the Official Code of Georgia Annotated Sections 32-38 through 32-3-10 to file with the Court a notice of appeal, the same to be in writing and made o part of the record in the proceedings. The said property, as thus affected, is described as follows: SEE PAGE 20-A;20-B; FOR DESCRIPTION This 14th day of October, 2019 **Rebecca Kedton Clerk Superior Court COBB COUNTY** PROJECT NO:: CSSTP-0006-00(866), PJ.10006866 COUNTY: Cobb County PARCEL NO.: 150

8000 Legals Cube #1115 Chalise Taylor Cube #1140 Christopher Askew Cube #1607 Ariel Johnson Cube #2022 Sheila Sommavilla Cube #2164 Annette Henderson Cube #2501 Oneki Huckaby 11:15,22-2019

8000

Legals

MDJ-3454 GPN-17 NOTICE OF PUBLIC SALE The following self-storage Cube con-tents containing household and other goods will be sold for cash by CubeSmart 340 Franklin Gateway SE, Marrietta GA 20067 to satisfy a Jian on Marietta GA 30067 to satisfy a lien on December 11, 2019 at approx. 11:00 AM at <u>www.storagetreasures.com</u>. Cube 1016 Zina Hicks Cube 1052 Latisha Thibadeau

1032	
1081	Donald Pendergrass
1184	Paulina Ongsingco
1214	David Ball
1232	Crystal A Rodenberg
1247	Jonathan Nobles
2155	Deron Dotts
2208	Michael Morvaji
2234	Shatoya Grimsley
2237	Stanley B Davis
2352	Daryl Washington
2381	Hannah Cordle
2424	Jibril Beamon
2446	Degng Deleon
2452	Lucious Davis
	11:15,22-2019

MDJ-3456

MDJ-3456 GPN-14 FY BUDGET The Governing Board of Kennesaw Charter Science and Math Academy will be meeting Thursday, November 21, 2019 at 5:30pm in the schools Media Center. The first reading of the pro-posed revised FY20 budget will be pre-sented. The public is invited to attend. 11:15-2019

MDJ-3460 GPN-17 NOTICE OF ABANDONED VEHICLES STATE OF GEORGIA COBB COUNTY You are hereby notified, in accordance with O.C.G.A. Section 40-11-19.1, that petitions were filed in the Magistrate Court of Cobb County to foreclose liens against the vehicles listed below for all Court of Cobb County to foreclose liens against the vehicles listed below for all amounts owed. If a lien is foreclosed, the Court shall order the sale of the ve-hicle to satisfy the debt. The present location of the vehicle is: 344 Kathleen Dr. Se, Marietta GA 30067. Anyone with an ownership interest in a vehicle listed herein may file an an-swer to the petition on or before: 11/25/19. Answer forms may be found in the Magistrate Court Clerk's office located at: 32 Waddell St SE, Marietta, GA 30090. Forms may also be obtained online of

Forms may also be obtained online at

Forms may also be obtained online at www.georgiamagistratecouncil.com Vehicle make: JEEP Year: 1999 Model: CHEROKEE Vehicle License #: PJL8605 State: GA Magistrate Court Case No.: 19-L-03469 Vehicle I.D# 1J4FT6858XL552309 Vehicle make: FORD Year: 2002 Model: EXPEDITION XLT Vehicle I.D# 1FMRU15W82LA98920 Vehicle License #: RRP4559 State: GA Magistrate Court Case No.: 19-L-03472 Vehicle I.D# 2HNYD18281H521669 Vehicle I.D# 2HNYD18281H521669 Vehicle License #: NONE State: Magistrate Court Case No.: 19-L-02473 11:15,22-2019

MDJ-3461

11:15,22-2019 MDJ-3461 GPN-17 NOTICE OF ABANDONED VEHICLES STATE OF GEORGIA COBB COUNTY You are hereby notified, in accordance with OCGA 40-11-19{(a)(2), that each of the below-referenced vehicles are sub-ied in court to foreclose a lien for all amounts owed. If the lien is foreclosed, a court shall order the sale of the vehi-cle to satisfy the debt. The vehicles are currently located at 344 Kathleen Dr SE, Marietta, Ga.30067 The vehicles subject to liens as stated above are identified as: Vehicle ID#: JN1DA31A03T435128 Vehicle ID#: JN1DA31A03T435128 Vehicle License: NONE State: Vehicle ID#: JN1DA31A03T435128 Vehicle License: AXL4472 State: GA Vehicle License: NONE State: Vehicle License: NONE State: Vehicle License: ROXIA Year: 2003 Model: XE Vehicle License: ROXIA Year: 2004 Model: ACCORD Vehicle License: RDZ2127 State: GA Vehicle ID#: JTKDE177060086620 Vehicle License: FORD Year: 2006 Model: DIF: IFTSW2BRXAEB15060 Vehicle ID#: IFTSW2BRXAEB15060 Vehicle ID#: IFTSW2BRXAEB15060 Vehicle ID#: IFTSW2BRXAEB15060 Vehicle ID#: JN1522-2019 MDJ-3465 GPN-17

MDJ-3465

MDJ-3523 GPN-17 Public Sole to be held by Big Tow Wrecker Service, 1260 Sondtown Rd Wwecker Service, 1260 Sondtown Rd Wrecker Service reserves the right of bid. The following vehicles will be sole the held best of the Service reserves the right of the Alphest and Desi Packers Les The R (GHT 70G REFUSE ISSUING BIDDER NUMBER TO ANY PER-SON. 2002 A CURA 3.5RL HH4KA965820013851 2003 A CURA 135RL HH4KA965820013851 2004 A CURA 15X HH4CL46906C017465 1987 BMW 325 WBAD2310MED30470 1987 BMW 325 WBAD2310MED30470 1987 BMW 325 WBAD2300H8840421 2007 BMW 530 WBAD2300H8840421 2007 BMW 530 WBAD23300LH24685 WBAD23300LH24685 WBAD23300LH24685 WBAD23300LH24685 WBAD23300LH24685 WBAD2300H8840421 2007 BMW 530 WBAD23300LH24685 WBAD2300H8840421 2008 GUCK REGAL 2009 BUICK REGAL 2009 CHEVROLET CON-COURSE IG6RF54929U200545 1979 CHEUROLET CON-COURSE IG6RF54929U200545 1979 CHEUROLET CAVALIER 2004 CHEVROLET CAVALIER 2005 CADILAC DEVILLE CON-COURSE IG6RF54929U2012 2008 CHEVROLET CAVALIER 2004 CHEVROLET CAVALIER 2004 CHEVROLET CAVALIER 2005 CHEVROLET CAVALIER 2004 CHEVROLET MAPALA 20117351X8990090 2005 CHEUROLET MAPALA 2011751871992275 2011 CHEVROLET MAPALA 2011751871929275 2010 CHEVROLET MAPALA 2010 CHEVROLET MALIBU 2010 CHEVROLET MAPALA 2010 CHEVROLET MALIBU 2010 CHEVROLET MALIBUA 2010 CHEVROL

16HCB08144G060789 2013 HOME MADE 5 X 12 UTILITY 7908164 2000 HONDA ACCORD

 8000
 Lega

 1994 SMOKERCRAFT
 SMK22009A494

 2003 SUZKI VZ800
 JSIVS53A232101044

 1995 TOYOTA CAMRY
 4115K12E0SUS33717

 2005 TOYOTA CAMRY
 4115K12E0SUS33717

 2005 TOYOTA CAMRY
 411B532K85U042678

 2011 TOYOTA CAMRY
 411B532K85U042678

 2011 TOYOTA CAMRY
 411B532K5010456693

 2007 TOYOTA CAMRY
 411B532K010456693

 2007 TOYOTA CAMRY
 411B532K010456693

 2007 TOYOTA CAMRY
 411B532K010456693

 2007 TOYOTA CCROLLA
 5YFBURHE40P379571

 2007 TOYOTA PRIUS
 JJDKB20UX73207361

 2007 TOYOTA SCION TC
 JTKDE177960106413

 J969 UTILITY TRAILER
 330151

 2004 VOLKSWAGEN JETTA
 WWF71K56M844690

 1991 VOLKSWAGEN JETTA
 WWWF71K3C87P017140

 2007 VOLKSWAGEN PASSAT
 WWWF71K3C87P017146

 1996 VOLVO 850
 YVILS551672280161

 11:15,22-2019
 1126
 8000 Legals MD I-3525

MDJ-3275 GPN-17 Public sale to be held by Cobb Towing Service, 2551 Austell Rd, Marietta, GA 30008, 770-432-9320. Sale will take place on Friday, NOVEMBER 29, 2019 at 1 pm. Gates open at 12 noon, rain or shine. Cobb Towing Service reserves the right to bid. The following vehicles will be sold to the highest and best bid-der. List changes daily, COBB TOW-ING SERVICE RESERVES THE RIGHT TO REFUSE ISSUING BID-DER NUMBER TO ANY PERSON. 1998 CHEVROLET LUMINA 2G1WL52M9W3307155 1996 TOYOTA COROLLA 2T1BA02EATC111273 2002 LEXUS ES300 JTHBF306020017744 2017 CACAMRY 4T1BDIFK4CU058326 2005 TOYOTA COROLLA 1NXBR32E55Z469573 11:15,22-2019 11:15,22-2019

MDJ-3555

MDJ-3555 GPN-14 Legal Notice On November 15, 2019, the U.S. Army Corps of Engineers (USACE), Mobile District, released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Wa-ter Supply Storage Reallocation Study and Updates to Weiss and Logan Mar-tin Reservoirs Proiect Water Control Manuals, Alabama and Georgia. A 45-day public review period, expiring on December 30, 2019, is currently in place for parties interested in provid-ing written or electronic comments in the following formats: Online as PDF documents at https://www.sam.usace.army.mil/

Online as PDF documents at https://www.sam.usace.army.mi// Missions/Planning-Environmental/ Allataona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/Document-Library/; As a CD when requested in writing to: Commander, U.S. Army Corps of Engi-

As a CD when requested in writing to: Commander, U.S. Army Corps of Engi-neers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mo-bile AL 36628; Comments may be submitted via the following methods: Onsite at open-house style public meet-ings through comment forms or the court reporter; By emailing to act-acr@usace.army.mil; By letter ad-dressed to: Commander, U.S. Army Corps of Engineers, Mobile District,

deressed 10: Commander, U.S. Army Corps of Engineers, Mobile District, Atth: PD-EI (ACT-FR/SEIS), P.O. Box 2288, Mobile AL 36628. Public meetings will be held at the fol-lowing locations and times: Monday, December 9, 2019, 4:00 pm-8:00 pm EST, Acworth Community Center, 4361 Cherokee Street, Acworth, Georgia 30101; (770) 917-1234; Tuesday, December 10, 2019, 4:00 pm-8:00 pm EST, Forum River Civic Cen-ter Berry/Shorter Room, 301 Tribune Street, Rome, Georgia, 30161; (706) 291-5281; Wednesday, December 11, 2019, 4:00

Street, Rome, Georgia, 30141; (706) 291-5281; Wednesday, December 11, 2019, 4:00 pm-8:00 pm CST, The Pitman Theater, 629 Broad Street, Gadsden, Alabama 35901; (256) 549-4740; Thursday, December 12, 2019, 4:00 pm-8:00 pm CST, Friends on Eight, 109 8th Avenue SW, Childersburg, Alabama 35044; (205) 296-297. The Draft FR/SEIS presents the re-sults of the USACEs analysis of the en-vironmental effects of the Tentatively Selected Plan (TSP) addressing pro-posed reallocation of reservoir storage in Alatoona Lake to municipal and in-dustrial water supply and APC-pro-posed modifications to flood operations at Weiss and Logan Martin reservoirs. The Final FR/SEIS is scheduled to be completed and filed with the USEPA in the Fall of 2020. The Record of Deci-sion (ROD), if appropriate, will be signed following state and federal agency review of the Final FR/SEIS, along with approval of pertinent up-dates to the ACT River Basin Master Manual and individual project Water Control Manuals, currently anticipated to occur in the Spring of 2021. <u>11:15-2019</u>

30060. This 4th day of November, 2019. WITNESS the Honorable Judge Mary Staley Clark, Judge, Superior Court of Cobb County. 11:15,22,29;12:6-2019

11:5;22;29;12:6-2019 MDJ-3425 GPN-14 CITATION IN THE SUPERIOR COURT OF COBB COUNTY GEORGIA DEPARTMENT OF TRANSPORTATION VS. 0.788 acres of land; and certain ease-ment rights; and Morning View Bap-tist Church Inc. of Acworth, GA; Bank of the Ozarks; Cobb County Water System; Tax Commissioner of Cobb County, individually The said named persons and any and all other persons known and unknown claiming any right, title, power, inter-est, ownership, equity, claim or de-mand in and to the lands hereinafter described, and all occupants, tenants, lessees, licensees and all holders, own-ers and users of ways and easements in, across, over and under said land are hereby notified, under the provi-sions of the Official Code of Georgia Annotated Sections 32-34 through 32-3-19, providing for the exercise of the power of eminent domain by the State of Georgia, or any of its subdivisions, or by any county of such State, as folof Georgia, or any of its subdivisions, or by any county of such State, as fol-

or by any county of such State, as fol-lows: That the above stated case, being a condemnation in rem against the prop-erty hereinafter described, was filed in soid Court on the 14th day of October, 2019; That, in accordance with provi-sions of the aforesaid Official Code, a Declaration of Taking, duly authorized and properly executed as provided by the Official Code, has been made and filed in said case, declaring the neces-sity for and exercising the power of taking the said described lands for State-aid public road purposes, thereby vesting the title to same in the Depart-ment of Transportation; and, in pur-suance of such authority, the Depart-ment of Transportation has deposited with the Clerk of the Superior Court of said County \$101,000.00 as the just com-pensation for the said lands described; and all persons claiming such fund or any interest therein, are hereby re-guired to make known their colims any interest therein, are hereby re-quired to make known their claims to the Court; In accordance with the pro-visions of the Official Code of Georgia Annotated, the plaintift-Condemonor has proved the Court for Immediate pos-session of said property, and all per-sons having any interest in or claim against such property, as above set forth, are required by the Order of the Judge of said Court to surrender pos-session of the property to the Depart-ment of Transportation no later than 30 days from filing of the Declaration of Taking. That in accordance with the Official Code of Georgia Annotated Section 32-3-13 through 32-3-19, if the owner, or any of the owners, or any person having a claim against or inter-est in said property, shall be dissatis-tied with the compensation, as estimat-ed in the Declaration of Taking and de-posited in Court, such person or per-sons, or any of them, shall have the right, at any time subsequent to the fil-ing of the Declaration and the deposit of the fund into Court but not later than 30 days following the date of ser-vice as provided for in the Official Code of Georgia Annotated Sections 32-3-8 through 32-3-10 to file with the Court a notice of appeal, the same to be in writing and made a part of the record in the proceedings. The said property, Bay Starbarts and sectioned as follows: SEE PAGE 20-A;20-B; 20-C; FOR DE-court any Time subra declaration declaration any interest therein, are hereby re-quired to make known their claims to as follows

SEE PAGE 20-A;20-B; 20-C; FOR DE-SCRIPTION This 14th day of October 2019.

2019. Rebecca Keaton Clerk Superior Court COBB COUNTY PROJECT NO.: CSSTP-0006-00(857) & CSSTP-0006-00(866), P.I. 0006866 COUNTY: Cobb County PARCEL NO.: 103

sions of the aforesaid Official Code, a Declaration of Taking, duly authorized and properly executed as provided by the Official Code, has been made and filed in said case, declaring the neces-sity for and exercising the power of taking the said described lands for State-aid public road purposes, thereby vesting the title to same in the Depart-ment of Transportation; and, in pur-suance of such authority, the Depart-ment of Transportation has deposited with the Clerk of the Superior Court of said County \$75,100.00 as the just com-pensation for the said lands described; and all persons claiming such fund or any interest therein, are hereby re-quired to make known their claims to the Court; In accordance with the pro-visions of the Official Code of Georgia Annotated, the plaintiff-Condemnor has praved the Court for Immediate pos-session of said property, and all per-sons having any interest in or claim against such property to the Depart-ment of Transportation to later than 30 days from filing of the Declaration of Taking. That in accordance with the Official Code of Georgia Annotated Section 32-3-13 through 32-319, if the owner, or any of the owners, or any person having a claim against or inter-est in said property, shall be dissatis Jection 32-3-13 through 32-3-19, if the owner, or any of the owners, or any person having a claim against or inter-est in said property, shall be dissatis-fied with the compensation, as estimat-ed in the Declaration of Taking and de-posited in Court, such person or per-sons, or any of them, shall have the right, at any time subsequent to the fil-ing of the Declaration and the deposit of the fund into Court but not later than 30 days following the date of ser-vice as provided for in the Official Code of Georgia Annotated Sections 32-3-8 through 32-3-10 to file with the Court a notice of appeal, the same to be in writing and made a part of the record in the proceedings. The said property, as thus affected, is described as follows:

SEE PAGE 20-A;20-B; 20-C; FOR DE-SCRIPTION This 14th day of October,2019

Rebecca Keaton

Rebecca Keaton Clerk Superior Court COBB COUNTY PROJECT NO.: CSSTP-0006-00(866), P.1.0006866 COUNTY: Cobb County PARCEL NO.: 93 REQUIRED R/W: 93 0.452 acres of land; and certain easement rights PROPERTY OWNERS: Foor Points Church Incorporated; Highland Com-mercial Bank; Tax Commissioner of Cobb County. Cohh County

Cobb County. All that tract or parcel of land lying and being in Land Lot 114 of Land Dis-trict 20 of Cobb County, Georgia, being more particularly described as more follows:

more particularly described as follows: <u>Right of Way</u> Beginning at the point of intersection on the existing southwestern right of way line of SR 92 with the southwest-ern property line of the condemnees, said point being 50.07 feet left of and opposite Station 250-55.89 on the con-struction centerline of SR 92 on Geor-gia Highway Project No. CSSTP-0006-00(866); running thence N 40°11'07.5" W a distance of 25.45 feet to a point 75.48 feet left of and opposite station 250-157.42 on said construction center-line laid out for SR 92; thence N 41° 53'17.3" W a distance of 23.41 feet to a point 98.88 feet left of and opposite sta-tion 250-158.13 on said construction centerline laid out for SR 92; thence N 32°10'16.0" W a distance of 12.22 feet to a point 127.94 feet left of and opposite station 250+68.80 on said construction centerline laid out for SR 92; thence N 37'13'26.9" W a distance of 12.127 feet to a point 137.85 feet left of and opposite station 250+68.80 on said construction centerline laid out for SR 92; thence N 83'15'26.9" W a distance of 21.17 feet to a point 154.15 feet left of and opposite station 250+43.33 on said construction centerline laid out for SR 92; thence N 83'15'26.9" W a distance of 9.46 to a point 154.145 feet left of and opposite station 250+43.34 w a distance of 9.46 to a point 154.00 feet left of and opposite station 250+43.4" W a distance of 29.64 feet to a point 154.00 feet left of and opposite station 250+43.4" w a distance of 29.64 feet to a point 155.00 feet left of and opposite station 250+43.4" w a distance of 29.45 feet to a point 155.00 feet left of and opposite station 250+43.4" w a distance of 29.45 feet to a point 155.00 feet left of and opposite station 250+43.4" w a distance of 29.45 feet to a point 155.00 feet left of and opposite station 250+43.4" w a distance of 20.45 feet to a point 155.00 feet left of and opposite station 250+43.4% on said construction a point 155.00 feet left of and opposite station 250+42.96 on said construction centerline laid out for SR 92; thence N 46'22'32.7" E a distance of 47.04 feet to a point 155.00 feet left of and opposite station 250+90.00 on said construction centerline laid out for SR 92; thence S 43''37'27.3" E a distance of 27.00 feet to a point 128.00 feet left of and opposite station construction centerline laid out for SR 92; thence N

P.I. 0008866 COUNTY: Cobb County PARCEL NO.: 150 REQUIRED R/W: 0.082 acres of land;

and PROPERTY OWNERS: Damian Mar-cel Pressley; Pennymac Loan Ser-vices, LLC; Mortgage Electronic Reg-istration Systems, Inc.; Tax Commis-sioner of Cobb County. All that tract or parcel of land lying and being in Land Lot 75 of Land Dis-trict 20 of Cobb County, Georgia, being more particularly described as follows: follows

Child being in Long Long to be carding, being more particularly described as follows: <u>Right of Way</u> <u>Beginning at a point of intersection be-tween the western existing right of way line of SR 92 with the southern property line of the condemnees, said point being 53.08 feet left of and oppo-site Station 307+68.93 on the construc-tion centerline of SR 92 on Georgia Highway Project No. CSSTP-0006-00 (866); running thence N 68*05'34.5" W ad distance of 7.08 feet to a point 60.00 feet left of and opposite station 307+70.40 on said construction center-line laid out for SR92; thence N 7° 17/13.8" E a distance of 31.82 feet to a point 70.00 feet left of and opposite station 307+70.40 on said construction center-line laid out for SR92; thence N 7° 17/13.8" E a distance of 36.16 feet to a point 22.21 feet right of and opposite station 199+05.00 on said construction centerline laid out for SR92; thence N 24'01'21.3" W a distance of 36.16 feet to a point 25.21 feet right of and opposite station 199+05.00 on said construction centerline laid out for B RIDGEMONT PL; thence southeasterly 37.663 feet along the arc of a curve (said curve having a radius of 28.230 feet and a chord distance of 37.633 feet on a bear-ing of S&'1301.9" E) to the point 25.08 feet hoad chord distance of 37.633 feet on a bear-ing of S&'1301.9" E) to the point 25.08 feet back to the point 25.08 feet back to the point of begin-ning. Said described land being the re-guired right of way and is shown as de-scribed within on the attached plats. marked Annex 1-A. The title, estate or interest in the dove described lands, required by condemnor and now taken by condem-nor for public use is as follows: Fee simple title to the above described lands all as shown colored vellow on the attached plats dated the 6" day of OCober, 2016; Sheet 60-084 last revised March 18, 2019, Sheet 60-084 last revised March 18, 2019, Sheet 60-084 last revised March 18, 2019, Sheet 60-084 last rev</u>

MDJ-3444

MDJ-3444 GPN-17 NOTICE OF PUBLIC SALE The following self-storage Cube con-tents containing household and other goods will be sold for cash by CubeSmart 4676 S Atlanta Rd, Atlanta GA 30339 to satisfy a lien on December 11,2019 at approx. 12:00PM at www.storagetreasures.com.

MDJ-3465 GPN-17 PUBLIC AUCTION PUrsuant to the Georgia Self-Service Storage Facility Act, notice is hereby given that SS Marietta, LLC dvla Sim-ply Self Storage at 732 Chance Road, Marietta GA 30066 will sell at public auction the personal property in the below-listed occupants' leased unit(s) to satisfy the owner's lien. The person-al property stored therein by the fol-lowing occupants may include but is not limited to general household, office and personal items, furniture, boxes, clothes, and appliances. The unit(s) will be sold at public auction through online auction services of www.Storagetreasures.com with bids opening at 12 PM on November 23, 2019 and closing at 12 PM on November 23, 2019. A015 - Michael Leverette - Wash-er/Dryer; B027 - Stephanie Espinosa -Vacuums/bolly; C007 Renee Burwell Mattress/Box spring; C029 Fern Ellis Telescope/Speaker; C048 Sharda S Weatherspoon Monitor/Speakers; C049 - William Thomas Shirk Jr Drumset/TV; D008 Dedrick Zackery Skate board/Saw horses; D075 - Angela J Druy Punching bag/Leather chair. 11:15,22-2019

Skate board/Saw horses; D075 - Angela J Dorry Punching bag/Leather chair. 11:15,22-2019 MDJ-3522 GPN-14 NOTICE TO THE PUBLIC YOU ARE HEREBY NOTIFIED that on November 25th, 2019, at 2:30 P. M., at the Cobb County Courthouse in the City of Marietta, Georgia, Judge Brantley of the Superior Court of Cobb County will hear the case of STATE OF GEORGIA vs. CITY OF SMYRNA and COBB COUNTY, GEORGIA, Civil Action File No. 19-18259, in the Superi-or Court of Cobb County, the same be-ing a proceeding to confirm and vali-date the tax allocation bond designated "City of Smyrna Refunding Tax Alloca-tion Bond (Atlanta Road Corridor Project). Series 2019" in the original principal amount of \$12,725,000 (the "Bond"). The Bond is to be issued by the City of Smyrna (the "City") for the purpose of obtaining funds to refund by prepayment all of the Citys unpadi obligations owed under the Develop-ment Agreement, dated August 11, 2008, as supplemented and amended by the First Amendment to Development Agreement, dated December 16, 2013, among the City, the Smyrna Downtown Development Authority, and Halpern Enterprises, Inc. and to finance relat-ed costs, in order to achieve debt ser-vice savings and decrease the expected final maturity date of tax allocation bonds outstanding for the hereinafter described tax allocation district. In such proceeding the Court will also pass on the validity of the security for the payment of the Bond, which con-sists of the Bond Purchase Agree-ment, the City will pledge the "Pledged Revenues" (cs defined in the ond Purchase Agreement) to secure the Bond Buyer") and loined in for limited purposes by Cobb County. Georgia (the "County"), proposed to be executed in connection therewith. Pursuant to the Bond, which con-sits of the Bond Purchase Agree-ment, the City will pledge the "Pledged Revenues" (cs defined in the ond Purchase Agreement) to secure the payment of the Bond, which in-cludes all positive "tax allocation in-crements" (cs defined in the "Redevelop-ment Powers Law", codified and pen specified in the Bond Purchase Agree ment, in each case to be derived from the tax allocation district created by the City pursuant to the Redevelop-ment Powers Law and known as "Tax Allocation District Number One - At-lanta Road Corridor". All questions of law and fact pertaining to the right to issue the Bond and to provide the secu-rity therefor will be heard and deter-mined. Any citizen of the State of Georgia residing in the City of Smyrna or Cobb County, Georgia, or any per-son wherever residing who has a right to object, may intervene and become a party to this proceeding.

to object, may intervene and become a party to this proceeding. WAIVER OF PUBLIC ACCOUNT-ABILITY: NO PERFORMANCE AU-DIT OR PERFORMANCE REVIEW UNDER SECTION 36-82-100 OF THE OFFICIAL CODE OF GEORGIA AN-NOTATED SHALL BE CONDUCTED WITH RESPECT TO THE BOND. This the 12 day of November 2019. Rebecca Keaton CLERK, Superior Court of Cobb County 11:15,22-2019

1HGCG5652YA103775 1992 HONDA ACCORD 1HGCB7674NA206672 1772 110NDA ACCORD 1HGCB7674NA206672 2008 HONDA ACCORD 1HGCS1798A014882 2001 HONDA ACCORD 1HGCG16561A022454 2003 HONDA ACCORD 1HGCG65548XA124329 1999 HONDA ACCORD 1HGCG6501VA141572 1999 HONDA ACCORD 1HGCG652XA066327 1998 HONDA ACCORD 1HGCG652XA066327 1998 HONDA CIVIC 2HGEJ631WH121226 1999 HONDA CIVIC 2HGEJ6321H57568 2001 HONDA CIVIC 2HGES16521H574588 1998 HONDA CIVIC 2HGES16521H574588 1998 HONDA CIVIC 1HGEJ6221WL075013 2001 HONDA ODYSSEY 2001 HONDA ODYSSEY 2HKRL18741H53796 2005 HYUNDAI ELANTRA KMHDN56D45U144995 1994 ISUZU CONVENTIONAL JAACL11L7R7220153 2006 ISUZU NPR 4KLC4B1U46J803122 1999 ISUZU TROOPER JACDJ58X6X7930207 2001 JAGUAR S TYPE 54 IDA01031EMI7113 2001 JAGUAR S TYPE SAJDA01N21FM17113 2002 JAGUAR X TYPE SAJEA51C92WC84998 1999 JEEP GRAND CHEROKEE 1J4GW5853XC530515 0000 KAWAS AKI NUN LA 1J4GW5853XC530515 2009 KAWASAKI NINJA JKAZX4R129A013548 2007 KIA OPTIMA KNAGE124475087921 1994 LEXUS LS400 JT8UF11E0R0186618 2003 LEXUS RX300 JTJHF10U530295026 2001 LINCOLN LS 11 NHAM57A51X471472 2003 LE XUS RX300 2013 LINCOLN LS 1LNHM8751Y 671442 1999 LINCOLN TOWN CAR 1LNHM81W7X Y688062 2010 MAZDA 3 JM1BL1SF5A122840 2004 MAZDA 6 1YVHP82D345N71160 2008 MAZDA CX-7 JM3ER29L280196417 2000 MAZDA WAGON JM3LW28GXY0139807 1990 MERCEDES BENZ 500SL WDBFA66E5LF005434 2011 MERCEDES BENZ 500SL WDBFA66E5LF005434 2010 MERCEDES ES50 WDBLA64E5LF005434 2011 MERCEDES SPORT VAN SPRINTER WDZPE80C9B5582965 2000 MERCURY SABLE 1MEFM5555YA60009 2012 MITSUBISHI GALANT 4A3282F72CE017140 2013 MISUBISHI GALANT 4A3282F72CE017140 2013 MISUBISHI GALANT 4A32845G91E195780 2016 MISUBISHI GALANT 4A3A3643G9YE076847 1990 NISSAN ALTIMA 1N4AL1103SN428129 2002 NISSAN ALTIMA 1N4AL11228C37421 2003 MISSAN ALTIMA 1N4AL1127830 2015 MISSAN ALTIMA 1N4AL1127830 2015 MISSAN ALTIMA 1N4AL1127830 2015 MISSAN ALTIMA 1N4AL1157838 1995 NISSAN ALTIMA 1N4AL315772319 1996 NISSAN ALTIMA 1N4BU3103SC172319 1996 NISSAN ALTIMA 1N4BU3103SC172319 1996 NISSAN ALTIMA 1N4BU3103SC172319 1N4BU31D3SC172319 1996 NISSAN ALTIMA 1N4BU31D5TC182996 2002 NISSAN ALTIMA 1N4AL11D62C290870 2003 NISSAN ALTIMA 1N4AL11D63C192195 2012 NISSAN MAXIMA 1N4BA41E04C917019 2009 NISSAN MAXIMA 1N4AA51E99C842877 2009 NISSAN QUEST 5N1BV28U59N108610 5N1BV28U39N108610 1996 N1SSAN SENTRA 1N4AB41DXTC809263 2002 OLDSMOBILE SILHOUETTE 1GHDX13E82D132245 2007 PIAGGIO X9500 ZAPM270W375001861 2001 PONTIAC AZTEK 2027DA09E51S509274 3G7DA03E51S509774 2000 PONTIAC BONNEVILLE 1G2HX54K0Y4209822 2009 PONTIAC G3 KL2TD66E59B660899 1986 PONTIAC GRAND PRIX 262GJ37H0G2292111 2004 SATURN L300 1G8JC54F34Y511436

MDJ-2984

MDJ-2984 gpnl0 IN THE JUVENILE COURT OF COBB COUNTY, GEORGIA IN THE INTEREST OF: C.B.; SEX-M; AGE-2; DOB: 9/9/15; CASE # 19CV1246-08 C.B.; SEX-M; AGE-4; DOB: 9/9/15; CASE # 19CV1247-08 Children Under 18 Years of Age NOTICE OF SUMMONS. TO: Jabria Tatyana Shade, Dar Darvell Brayles, and any unknown

Darius

T0: Jabria Tatyana Shade, Darius Daryell Broyles, and any unknown or unnamed father. The mother of the above referenced child is Jabria Tatyana Shade. The al-leged biological father of the above referenced child CB (dob 7//17) is be-lieved to be Darius Daryell Broyles. The father of the child CB (dob 9//15) is unknown and unnamed. YOU ARE FURTHER NOTIFIED that a petition for termination of parental rights in regard to the above refer-enced children was filed in the Juve-nile Court of Cobb County, Georgia, on the 8th day of May, 2019, and that by reason of an Order for service by pub-lication entered by the court on the 9th day of October, 2019; YOU ARE HEREBY COMMANDED AND REQUIRED to appear before the Juvenile Court of Cobb County, Geor-gia, in Marietta, Georgia, on the 13th day of January, 2020 at 9:00 o'clock a.m. The hearing is for the purpose of determining whether parental rights should be terminated. The effect of a termination gave that pour (i.e., a parent) can permaently lose your rights as a parent. A petition to terminate parental rights has been filed requesting the juvenile court of Cobb County, Georgia, on the 13th dap of January, 2020 at 9:00 viclock a.m. The hearing on the petition to terminate parental rights has been filed requesting the juvenile court of Cobb County, Georgia, the terminate your parental rights to your children (i.e., the above children). If you fail to appear at the hearing on the petition for termination of parental rights, then the court can terminate your parental rights in your absence. If the court at the trial finds that the facts set out in the petition are true and that termina-tion of your children. If the judgment terminates your children or make any decisions affecting your children or power undecision safter and it your children or your children's earnings or property. Your children's earnings or pr

attorney to represent you if the court finds that you are an indigent person. Whether or not you decide to hire an attorney or seek appointed counsel, you have the right to attend the hear-ing on such petition, to call witnesses on your behalf, and to question those witnesses brought against you. A copy of the petition for termination of parental rights may be obtained from the clerk of the Juvenile Court of Cobb County, Georgia, which is located at 32 Waddell Street, Marietta, Cobb County, Georgia 300%, during regular business hours. Monday through Fri-day, 8:00 a.m. until 5:00 p.m., exclu-sive of holidays. A free copy shall be available to you. Upon request to the clerk, the copy will be mailed to you. The children are in the present tempo-rary custody of the department of fam-ily and children services of Cobb Coun-



NEW & USED TIRES BUY & SELL 706-291-6292	Cou you cial sel. poin inq sta a C sire so spo wit
040 Trucks, Vans, SUV's	or the
99 White Ford truck conversion van in good condition 8cy. \$2200 Call 706 346-6084	- Wi Cle
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HI A-1 HI WE PAY UP TO \$5,000 FOR JUNK VEHICLES. CARS, TRUCKS, BUSES & HEAVY EQUIPMENT Call 706-936-9037	In t Sex Age DO A c Tar Pet Civ Joh
Cycles and 4 wheelers or we will sell for you! Easy Living Yamaha & Polaris. Hwy. 27N. (706) 234-8502	To By pub you
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gpn10 RN7620 CITATION AND PUBLICATION OF NOTICE, SUMMONS & PROCESS JUVENILE COUNT OF DUVENILE COUNT OF OPDIA	Wit 25 th Wit Pri Cou

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To:Laura Glanton, and any other un-known person claiming a parental in-terest Last Known address: 625 P.E. Davis Road, Reidsville, Georgia 30453 In the Interest of: R.G. Date(s) of Birth: 03/30/2002 File No: 19-JV-346 This notice and summons is published pursuant to an Order of the Court for service by publicable provisions of O.C.G.A. Section 29-217 to notify you that Petition for Permanent Guardian-ship, to the above named children in the above-styled matter was filed with this court on the 10th day of May, 2019. The basis for this filing includes, but is not limited to, your abandonment of your children and your failure to pro-vide child support for the children. You are entitled to oblect either to the es-tablishment of a permanent guardian-ship or the selection of the petitioner as permanent guardian, or both. Any objections must be filed in writing within fourteen days of the second pub-lication of this notice. The individual seeking the guardian-ship or to legitimate the minor within 30 days of the hearing on your objec-tion to the guardian, if you file a petition to legiting the the guardian-ship is Pamela Saxton. You will lose all rights to object to the appointment of a permanent guardian if you file a petition to legiting the hearing on your objec-tion to the guardianship. New Therefore, you, the parties named above, are commanded to lay all other business aside and to be and appear before the Juvenile Court of Floyd Country, Georgia located at the Juve-nile Court of Floyd County, Georgia at # 3 Government Plaza, Rome, Georgia on the 3"^{da} day of December, 2019 at 1:30 clock p.m., and to remain in at-tendance of the Court from hour to hour, day to day, month to month, year to year and time to time until dis-charged by the Court and you are here-by commanded to be and appear with the aforesaid children in said court at the time and place identified here in to make defense thereto and to show cause why the said children and all parties named herein should not be dedati with according

Legals

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P.O. Box 65, Rome, GA 30162-0065. You are entitled to counsel and the Court will appoint counsel for you if you are unable, without undue finan-cial hardship to employ your own coun-sel. If you ask for a lawyer to be ap-pointed to represent you, the Court will inquire into your financial circum-stances to determine if you qualify for a Court appointed attorney. If you de-sire to apply for counsel you must do so immediately. Any answer or re-sponse to the Petition must be filed within the time prescribed by the Georgia law and a copy of said answer or response served, upon counsel for

response served upon counsel for Petitioner identified above. itness the Honorable C. GREGORY PRICE Judge of the JUVENILE COURT OF FLOYD COUNTY, GA Stophynie Stevens.

Stephanie Stevens, erk-Juvenile Court of Floyd County,

11:8, 15, 2019

gpn10 RN7621 IN THE JUVENILE COURT FOR THE COUNTY OF FLOYD STATE OF GEORGIA the Interest of: DCM he I : M :10 B: 2009 child under the age of 18 ra Lynn Newman titioner

ra Lynn Newman stitioner vil Action No: 11-JV-202 hnny House bora Smith dre Mathis spondents <u>NOTICE OF PUBLICATION</u> <u>ANDRE MATHIS</u> / order of the Court for service by bilication dated November 1st, 2019, u are hereby notified that on the 25th (y of October, 2019 Petitioner, TARA (NN NEWMAN, filed a Motion for ssolution of Relative Placement You e required to file with the clerk of e Floyd County Juvenile Court, and serve upon Petitioner's Attorney, ul R Cadle, Jr, 710 West 2th Street. me, Georgia 30161, an answer in ting within thirty (30) days of the th day of October, 2019 itness the Honorable C. Gregory tice, Judge of Floyd County Juvenile purt. This the 1st day of November, 2019

rrt. Fhis the 1st day of November, 2019 Stephanie Stevens, Clerk Floyd County Juvenile Court 11:8, 15, 22, 29, 2019

Gpn10

terest Last

In the interest of: N.B. Date(s) of Birth: 03/03/2002 File No: 19/00117 This notice and summons is published pursuant to an Order of the Court for service by publication dated the 11th day of November, 2019, and in accor-dated to a summons is published pursuant to an Order of the Court for service by publication dated the 11th day of November, 2019, and in accor-dated the applicable provisions of O.C.G.A. Section 29-2-17 to notify you that Petition for Permanent Guardian-ship, to the above named children in the above-styled matter was filed with this Court on the 26th day of Septem-per or provide child support for the cludes, but is not limited to, your aban-on the stablishment of a perma-nent guardianship or to the selection of the establishment of a perma-nent guardianship or to the selection of the petitioner as permanent guardian-net guardianship or to the selection of the petitioner as permanent guardian-net guardianship or to the selection of the petitioner as permanent guardian-dir genrament guardian if you file and a permanent guardian if you file of a permanent guardian if you file a petition to legitimate the minor within 30 days of the hearing on your obic-tion. The individual seeking the guardian-dia oper ac commanded to lay all other before the guardianship. Now Therefore, you, the parties named above, are commanded to lay all other before the Juvenile Court of Floyd of 00 o'clock a.m. and to remain in at four, dev to day, month to month, year of the floh day of December, 2019 at the day to day, month to month, year of and the day do be and appear with the daroesid children in said court at head the burne do time until dis-charged by the Court and you are here-the addressid children in said court at make defense thereto and uppear with the daroesid children in said court at make defense thereto and appear with the daroesid children in said court at make defense thereto and appear with the daroesid children in said court at make defense thereto and to show or law. A copy of the petitio

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obtained in the Office of the Clerk of the Juvenile Court of Flovd County, Georgia at the Flovd County Court-house, #3 Government Plaza, Suite 202, Rome, GA 30161 during business hours or from counsel for the petitioner, to-wit: William O'Dell, Esq., J. Brent O'Dell, Esq., Special Assistant Attor-neys General, P.O. Box 65, Rome, GA 30162-0065. You are entitled to counsel and the Court will appoint counsel for you if you are unable, without undue finan-cial hardship to employ your own coun-sel. If you ask for a lawyer to be ap-pointed to represent you, the Court will inquire into your financial circum-stances to determine if you qualify for a Court appointed atformey. If you de-sire to apply for counsel you must do so immediately. Any answer or re-sponse to the Petition must be filed within the time prescribed by the Georgia law and a copy of said answer or response served upon counsel for the Petitioner identified above. Witness the Honorable C. GREGORY PRICE Judge of the JUVENILE COURT OF FLOYD COUNTY, GA Stephanie Stevens, Clerk-Juvenile Court of Floyd County, GA

Stephanie Stevens, Cli Court of Floyd County, GA 11:15, 22, 2019 Clerk-Juvenile

Gpn10 RN7640 CITATION AND PUBLICATION OF NOTICE, SUMMONS & PROCESS JUVENILE COURT OF FLOYD COUNTY, GEORGIA To:Sheldon Watkins and any other un-known person claiming a parental in-terest Last Known address

Last Known address: Unknown

Last Known address: Unknown In the Interest of: K.B. Date(s) of Birth: 01/18/2010 File No: 1900225 This notice and summons is published pursuant to an Order of the Court for service by publication dated the 11th day of November, 2019, and in accor-dance with the applicable provisions of O.C.G.A. Section 15-11-243 and O.C.G.A. Section 29-2-17 to notify you that Petition for Permanent Guardian-ship, to the above narmed children in the above-styled matter was filed with this Court on the 8th day of November, 2019. The basis for this filing includes;

the above-styled matter was filed with this Court on the 8th day of November, 2019. The basis for this filing includes, but is not limited to, your abandon-ment of your children and your failure to provide child support for the chil-dren. You are entitled to object either to the establishment of a permanent guardianship or to the selection of the petitioner as permanent guardian, or both. Any objection must be filed in writing within fourteen days of the sec-ond publication of this notice. The individual seeking the guardian, if you file a permanent guardian if you file a petition to legitimate the mi-nor within 30 days of the hearing on your objection to the guardianship. Now Therefore, you, the parties named above, are commanded to lay all other business aside and to be and appear before the Juvenile Court of Floyd County, Georgia located at the Juve-nile Court of Floyd County, Georgia d # 3 Government Plaza, Rome, Georgia

County, Georgia located at the Juve-nile Court of Floyd County, Georgia at # 3 Government Plaza, Rome, Georgia on the 10th day of December, 2019 at 9:00 o'clack a.m., and to remain in at-tendance of the Court from hour to hour, day to day, month to month, year to year and time to time until dis-charged by the Court and you are here-by commanded to be and appear with the aforesaid children in said court at the time and place identified herein to make defense thereto and to show cause why the said children and all parties named herein should not be dealt with according to the provisions of law. A copy of the petition may be obtained in the Office of the Clerk of the Juvenile Court of Floyd County, Georgia at the Floyd County Court-house, #3 Government Plaza, Suite 202, Rome, GA 30161 during business hours or from counsel for the petitioner, to-wit: William O'Dell, Esq., J. Brent O'Dell, Esq., Special Assistant Attor-neys General, P.O. Box 65, Rome, GA 30162-0055.

neys General, P.O. Box 65, Rome, GA 30162-0065. You are entitled to counsel and the Court will appoint counsel for you if you are unable, without undue finan-cial hardship to employ your own coun-sel. If you ask for a lawyer to be ap-pointed to represent you, the Court will inquire into your financial circum-stances to determine if you qualify for a Court appointed attorney. If you de-sire to apply for counsel you must do so immediately. Any answer or re-sponse to the Petition must be filed within the time prescribed by the Georgia law and a copy of said answer or response served upon counsel for the Petitioner identified above. Witness the Honorable C. GRECORY PRICE Judge of the JUVENILE COURT OF FLOYD COUNTY, GA Stephanie Stevens, Clerk-Juvenile Court of Floyd County, GA

EAV7562 Legal Notice On November 15, 2019, the U.S. Army Corps of Engineers (USACE), Mobile District, released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Wa-ter Supply Storage Reallocation Study and Updates to Weiss and Logan Mar-tin Reservoirs Project Water Control Manuals, Alabama and Georgia. A 45-day public review period, expiring on December 30, 2019, is currently in place for parties interested in provid-ing written or electronic comments in

gpn14

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Legals

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Legals

Place for parties interested in provid-ing written or electronic comments in response to the Draft FR/SEIS. The Draft FR/SEIS and appendices are available to the public for review in the following formats: • Online as PDF documents at https://www.sam.usace.army.mil/ Missions/Planning-Environmental/ Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/ Document-Library/; • As a CD when requested in writing

Document-Library/; • As a CD when requested in writing to: Commander, U.S. Army Corps of Engineers, Mobile District, Ath: PD-El (ACT-ACR DSEIS), P.O. Box 2288, Mobile AL 36628; Comments may be submitted via the following methods: • Onsite at open-house style public meetings through comment forms or the court reporter; By emailing to

By emailing to

By emailing to act-acr@usace.army.mil;
By lefter addressed to: Commander, U.S. Army Corps of Engineers, Mobile District, Athr. PD-E1 (ACT-FR/SEIS), P.O. Box 2288, Mobile AL 36628.
Public meetings will be held at the following locations and times:
Monday, December 9, 2019, 4:00 pm-8:00 pm EST, Acworth Community Center, 4361 Cherokee Street, Acworth, Georgia 30101; (770) 917-1234;
Tuesday, December 10, 2019, 4:00

Acworth, Georgia 30101; (770) 917-1234;
Tuesday, December 10, 2019, 4:00 pm-8:00 pm EST, Forum River Civic Center Berry/Shorter Room, 301 Tribune Street, Rome, Georgia, 30161; (760) 291-5281;
Wednesday, December 11, 2019, 4:00 pm-8:00 pm CST, The Pitman Theater, 629 Broad Street, Gadsden, Alabama 35901; (256) 549-4740;
Thursday, December 12, 2019, 4:00 pm-8:00 pm CST, Friends on Eight, 109 8th Avenue SW, Childersburg, Alabama 35041; (205) 296-2397. The Draft FR/SEIS presents the re-sults of the USACEs analysis of the en-vironmental effects of the Tentatively Selected Plan (TSP) addressing pro-posed reallocation of reservoir storage in Allatona Lake to municipal and in-dustrial water supply and APC-pro-posed modifications to flood operations at Weiss and Logan Martin reservoirs. The Endifications to flood operations posed modifications to flood operations at Weiss and Logan Martin reservoirs. The Final FR/SEIS is scheduled to be completed and filed with the USEPA in the Fall of 2020. The Record of Deci-sion (ROD), if appropriate, will be signed following state and federal agency review of the Final FR/SEIS, along with approval of pertinent up-dates to the ACT River Basin Master Manual and individual project Water Control Manuals, currently anticipated to occur in the Spring of 2021. 11:15, 2019

Gpn14 RN7594 IN THE SUPERIOR COURT OF FLOYD COUNTY, STATE OF GEORGIA Esperanza Domingo, Plaintiff, 7.

Allangumer Ramirez, Defendant CIVIL ACTION FILE No. 19Cv00739JFL001

CIVIL ACTION FILE No. 19Cv00739JFL001 ORDER Plaintiff having filed a Motion for Ser-vice by Publication, and said Motion and th affidavit in support thereof hav-ing been read and considered, the Court finds that plaintiff has made dili-gent and repeated efforts to perfect personal service upon defendant, but the defendant, after due diligence, can-not be found within the state. Therefore, it is the order of this Court that, in lieu of personal service upon defendant, defendant may be served by publication, in accordance with O.C.G.A. 9-11-4 (F)(1)(A) AND ©. Within 15 days, the clerk of court shall mail a copy of the order and a copy of the order and a copy of the complaint to the defendant's last known address. This 25th day of October, 2019. John E. Niedrach Judge John E. Niedrach Order Prepared By: Daniele Petkovicz-Tedesco

Daniele Petkovicz-Tedesco Attorney for Plaintiff's State Bar No.412039 11:8,15,22,29, 2019

Gpn10 RN7639 CITATION AND PUBLICATION OF NOTICE, SUMMONS & PROCESS JUVENILE COURT OF FLOYD COUNTY, GEORGIA To: Derick Carey, and any other un-known person claiming a parental in-terest

terest Last Known address: 2512 Drayton Drive, Augusta, Georgia In the Interest of: M.B. Date(s) of Birth: 03/03/2002 File No: 1900117

TRADE OR REN

Your Town The Level Services



LEGAL NOTICE

LEGAL NOTICE On November 15, 2019, the U.S. Army Corps of Engineers (USACE), Mobile District, released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Alla-toona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Ala-bama and Georgia. A 45-day public review period, expir-ing on December 30, 2019, is cur-rently in place for parties interested in providing written or electronic comments in response to the Draft FR/SEIS. The Draft FR/SEIS and appendices

FR/SEIS. The Draft FR/SEIS and appendices are available to the public for review in the following formats: • Online as PDF documents at https://www.sam.usace.armv.mi/Mis sions/Planning-Environmental/Allatoona-Lake-Water-Supply-Storace-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Beservoirs-Project-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/Document-

Water-Control-Wantuals/Document: Library/ As a CD when requested in writing to: Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), PO. Box 2288, Mobile AL 36628; Comments may be submitted via the following methods:

following methods: • Onsite at open-house style public meetings through comment forms or the court reporter; •By emailing to act-acr@usace.army.mil;

•By letter addressed to: Com-mander, U.S. Army Corps of Engi-neers, Mobile District, Attn: PD-EI (ACT-FR/SEIS), P.O. Box 2288, Mo-bile AL 2629

(ACT-FR/SEIS), P.O. Box 2288, Mo-bile AL 36628. Public meetings will be held at the following locations and times: • Monday, December 9, 2019, 4:00 pm-8:00 pm EST, Acworth Commu-nity Center, 4361 Cherokee Street, Acworth, Georgia 30101; (770) 917-1234

1234; • Tuesday, December 10, 2019, 4:00 pm-8:00 pm EST, Forum River Civic Center Berry/Shorter Room, 301 Tribune Street, Rome, Georgia, 30161; (706) 291-5281; • Wednesday, December 11, 2019, 4:00 pm-8:00 pm CST, The Pitman Theater, 629 Broad Street, Gads-den, Alabama 35901; (256) 549-4740; • Thursday, December 10, 2019, 4:00 pm-8:00 pm CST, The Pitman Theater, 629 Broad Street, Gads-den, Alabama 35901; (256) 549-4740;

4740; • Thursday, December 12, 2019, 4:00 pm-8:00 pm CST, Friends on Eight, 109 8th Avenue SW, Childers-burg, Alabama 35044; (205) 296-2397.

2397. The Draft FR/SEIS presents the re-sults of the USACE's analysis of the environmental effects of the Tenta-tively Selected Plan (TSP) addressenvironmental effects of the fenda-tively Selected Plan (TSP) address-ing proposed reallocation of reser-voir storage in Allatoona Lake to municipal and industrial water sup-ply and APC-proposed modifications to flood operations at Weiss and Logan Martin reservoirs. The Final FR/SEIS is scheduled to be com-pleted and filed with the USEPA in the Fall of 2020. The Record of De-cision (ROD), if appropriate, will be signed following state and federal agency review of the Final FR/SEIS, along with approval of pertinent up-dates to the ACT River Basin Master Manual and individual project Water Control Manuals, currently antici-pated to occur in the Spring of 2021. November 15, 2019 The Gadsden Times

401 Locust Street, P O Box 188 Gadsden, AL 35901 (205)549-2000 In State Watts Line:1-800-762-2464

STATE OF ALABAMA

ETOWAH COUNTY

Before me, Denedria Baba, a Notary Public, and in for said County, in said state, personally appeared Cynthia Scott, who is known to me, and who, after being by me duly sworn, deposes and says under oath as follows:

That she is an employee of The Gadsden Times, a newspaper published in said County, in said State, and authorized under the laws of the State of Alabama to carry advertising. That as such employee, she has knowledge of facts hereinafter stated, and that she is authorized by said newspaper, to make this affidavit:

That there is attached to said affidavit legal advertising of the Legel Notice which was printed in The Gadsden Times in its regularly circulated editions on November 15 2019 that the clipping attached to this affidavit constitutes an exact and true copy of said advertisement as it appeared in The Gadsden Times on dates shown above.

Cost of advertising \$ 160 600

Subscribed and sworn to by me on this the 15th day of November, 20 1.

Subscribed and sworn to before me on this the day of Wende, 20 19.



NOTARY PUBLIC 1212 My commission expires

EDIA U

The Birmingham News

Total

LEGAL AFFIDAVIT

AD#: 0009388029

\$195.25

State of Alabama,) ss

County of Jefferson)

Larry Leibengood being duly sworn, deposes that he/she is principal clerk of Alabama Media Group; that The Birmingham News is a public newspaper published in the city of Birmingham, with general circulation in Jefferson County, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Birmingham News 11/15/2019

am

Principal Clerk of the Publisher

Sworn to and subscribed before me this 15th day of November 2019

Notary Public

LEGAL NOTICE On November 15, 2019, the U.S. Army Corps of Engineers (USACE), Mobile District, released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Alabama and Georgia

Alabama and Georgia. A 45-day public review period, expiring on December 30, 2019, is currently in place for parties interested in providing written or electronic comments in response to the Draft FR/SEIS.

The Draft FR/SEIS and appendices are available to the public for review in the following formats.

Online as PDF documents at https://www.s am.usace.army.mil/Missions/Planning-Environmental/Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/Document-Library/:

As a CD when requested in writing to.
 Commander, US Army Corps of Engineers,
 Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mobile AL 36628;
 Comments may be submitted via the follow-

•Onsite at open-house style public meetings

through comment forms or the court reporter,

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Wednesday, December 11, 2019, 4.00 pm-800 pm CST, The Pitman Theater, 629 Broad Street, Gadsden, Alabama 35901, (256) 549-4740;

(230) 449 4740, Thursday, December 12, 2019, 4.00 pm-8:00 pm CST, Friends on Eight, 109 8th Avenue SW, Childersburg, Alabama 35044; (205) 296-2397

The Draft FR/SEIS presents the results of the USACE's analysis of the environmental ef-

fects of the Tentatively Selected Plan (TSP) addressing proposed reallocation of reservoir storage in Allatoona Lake to municipal and industrial water supply and APCproposed modifications to flood operations at Weiss and Logan Martin reservoirs. The Final FR/SEIs is scheduled to be completed and filed with the USEPA in the Fall of 2020. The Record of Decision (ROD), if appropriate, will be signed following state and federal agency review of the Final FR/SEIS, along with approval of pertinent updates to the ACT River Basin Master Manual and individual project Water Control Manuals, currently anticipated to occur in the Spring of 2021.

Bham News: November 15, 2019



Bidding quiz

You a	re South	, and the	e biddin
has gone	:		
South	West	North	East
1 🖤	Pass	1 🛧	Pass
2 🕈	Pass	2 🛧	Pass

What would you bid now with each of the following four hands? 1. \bigstar K4 \checkmark AK742 \bigstar 6 \bigstar AJ853 2. \bigstar 5 \checkmark AQ764 \bigstar A8 \bigstar KJ742 3. \bigstar J4 \checkmark QJ1053 \bigstar AQ \bigstar AKJ9 4. \bigstar 862 \checkmark KQJ83 \bigstar A \bigstar AJ92

1. Three spades. Partner's twospade bid, even though it's merely a repeat of his suit and therefore not an invitational bid, nevertheless should encourage you to go on. Partner almost certainly has six spades. His failure to pass two clubs or show a preference for hearts indicates substantial trick-taking values — pro-vided spades are trump.

Your now-adequate spade support and singleton diamond, as well as your extra high-card values, are attractive features that you have not yet shown. If there is a game, it must lie in spades, so you should encour-

age partner to bid it. 2. Pass. There's no use fighting the cards you were dealt. This is not a game-going setup, and the only real issue to be settled is where to play for a partscore. In view of the obvious misfit, your opening bid has not

improved one bit.

Partner will probably score four or five trump tricks at spades, and together with your high cards he is likely to produce a plus score. Any further effort by you to find a better resting place than spades is apt to result in going minus.

3. Three notrump. No further opportunity to play under game should be extended to partner. Your 18 high-card points and excellent intermediate cards plus partner's two bids clearly add up to a healthy chance for game.

Partner may of course elect to retreat to four spades, but with J-x of the suit you're well-prepared for that eventuality. If partner does bid four spades, he should be able to make 10 tricks at that contract easily.

4. Four spades. Your jump to game with such meager trump sup-port may look like an optimistic overbid, but partner's two spade bids make the prospect of losing four tricks rather remote.

Point-count bidders may find it difficult to accept the jump-raise to four with the given hand, but they would be hard-pressed to construct a hand that would not produce a good play for game opposite this one. For example, if partner has as little as \bigstar KQJ753 \heartsuit 9 \bigstar 865 \clubsuit 1043, game would be a very reasonable proposition.

MONTGOMERYADVERTISER.COM I FRIDAY, NOVEMBER 15, 2019 I 3D

HOROSCOPE **By HOLIDAY MATHIS**

ARIES (March 21-April 19). You don't care who gets credit, you just want the thing done. Because of this practical, egoless approach, you'll be quite effective in executing the action that propels things forward.

TAURUS (April 20-May 20). The same actions will take on different qualities than they once had. Taxing work becomes exciting opportunity. Tensions transform to attractions. Irritations become action items.

GEMINI (May 21-June 21). You don't need much persuasion to do the things you enjoy. When you find yourself struggling to maintain the discipline to complete an action, maybe it's not discipline you really need to look for. Look for the pleasure instead.

CANCER (June 22-July 22). Filmmakers turn money into stories. Songwriters turn it into music. Investors turn it into jobs, or, perhaps just into more money. For you, it's not about the dollars but what you can do with them.

LEO (July 23-Aug. 22). It will be interesting and fun to solicit ideas about your work and routines. Most of what you get will be unusable, more amusements than practical advice. Yet they'll still build a bond that's well worth the price of admission.

VIRGO (Aug. 23-Sept. 22). One thing about you that doesn't get acknowledged nearly enough is your bravery. Recognizing what little control any person really has in this big world, you go forward regardless, handling things all the way. Good on you.

LIBRA (Sept. 23-Oct. 23). While every circle could use outside influences, today's main enjoyment will be connecting with people who know the same references, history and culture and have a few similar opinions about it.

SCORPIO (Oct. 24-Nov. 21). If you always did whatever the group was into at the moment, you'd make no impact and have no lasting legacy. The same would be true if you never did it. You'll be on trend today, though you can easily drop off at any time.

SAGITTARIUS (Nov. 22-Dec. 21). Most people want to improve, though it's unlikely that everything will change simultaneously. As for you, the one thing you choose to work on will bring you luck and success in other areas as well.

CAPRICORN (Dec. 22-Jan. 19). With your many talents, you sometimes hold back, making sure others get their chance in the sun. It will feel quite refreshing to have the attention on someone else for a while.

AQUARIUS (Jan. 20-Feb. 18). You won't mind the hubbub of a crowd today, perhaps because you correctly sense there's an opportunity to find what you're looking for in a group of strangers.

PISCES (Feb. 19-March 20). What would you plan for the future if you knew you would arrive there much improved? Such things don't always happen in a straightforward way with a cumulative effect. But consistent movement makes progress inevitable.

TODAY'S BIRTHDAY (NOV. 15). Though you can be proud of your foundational habits and values you can be even more proud of the fact that you are willing to keep questioning, checking and building them to suit who you are becoming. This is the work that brings you love, passion, meaning, money and honor this year. Aries and Aquarius adore you. Your lucky numbers are 10, 30, 33, 38 and 2.



Tomorrow: Try to make it.

ADVERTISEMENT FOR BIDS Sealed bids will be received by the County Commission, in the Mobile Government Plaza, Eighth Floor South Tower, Mobile, AL, until 10:00 A.M. Wednesday, Decem-ber 11, 2019 and then publidy opened for furnishing all labor and materials, and performing all work required by Mobile County and described as follows: Project: Renovation and ADA Upgrades to Clayton Park for the City of Citronelle Project Summary: Reconstruct and Upgrade elements of existing ball fields to in-clude field grading and sod, dugouts, fencing, score boards, sidewalks and paving, bleachers and renovations and upgrades to existing restroom and press box all in compliance with ADA requirements.

One Hundred fifty (150) calendar days are allowed for the construction of the

All bids must be on blank forms provided in the Specifications and submitted in its entirety. A cashier's check drawn on an Alabama bank or a Bidder's Bond, payable to Mobile County, Alabama, for an amount not less than five percent (5%) of the amount bid, but in no event more than ten thousand dollars (\$10,000), shall be filed with the proposal, the Bidder's Bond being prepared on the form specified and signed by a bonding company authorized to do business in the State of Alabama.

A Performance Bond in the form and terms approved by the County in an amount not less than the contract price will be required at the signing of the contract. A la-bor and materials bond in form and terms approved by the County in an amount not less than the contract price, insuring payment for all labor and materials, shall also be required at the signing of the contract. In addition, the Contractor must furnish to the County at the time of the signing of the contract a certificate of in-surance coverage as provided in the specifications. The right is reserved to reject any and/or all bids and to waive informalities and to furnish any item of material or work to change the amount of said Contract.

Liquidated damages for non-completion of the work within the time limit agreed upon will be assessed in accordance with the terms of the Contract.

Specifications are on file and may be seen at the office of Facilities Design and Con-struction Engineering, 7th Floor West, South Tower, Government Plaza, 205 Government Street, Mobile Alabama. Specifications may be obtained at the office of WAS Design Architects by depositing **One Hundred (\$100.00)** dollars for each set. This deposit shall be refunded in full to each prime Contractor Bidder upon return of the documents in reusable condition within ten (10) days after Bid Opening for up to two (2) sets. The cost of and return of additional sets of Specifi-cations shall be in accordance with Section 39-2-3 in the code of Alabama 1975. No specifications will be issued to contractors later than twenty-four (24) hours prior to the time indicated above for receiving bids.

All prospective bidders shall have a representative present at a <u>mandatory</u> Pre-bid Conference that will be held **Monday**, **December 2**, 2019, at 10:00 a.m., on site at Clayton Park located at 17800 Municipal Park Dr., Citronelle, Alabama. All contrac-tors not having a representative at this meeting <u>will be disqualified</u> from bidding on this project.

No bids will be considered unless the bidder, whether resident or non-resident of Alabama, is properly licensed and qualified to submit a proposal for this construc-tion in accordance with all applicable laws of the State of Alabama. This shall in-clude evidence of holding a current license from the State Licensing Board for Gen-eral Contractors, Montgomery, Alabama, as required by Chapter 8 of Title 34, of the Code of Alabama, 1975. In addition, non-residents of the State, if a corpora-tion, shall show evidence of having qualified with the Secretary of State to do busi-ness in the State of Alabama.

Prior to the award of a competitively bid contract to a contractor having one or

Sealed bids will be received by the County Commission, in the Mobile Government Plaza, Eighth Floor South Tower, Mobile, AL, until 10:00 A.M. Wednesday, Decem-ber 11, 2019, and then publicly opened for furnishing all labor and materials, and performing all work required by Mobile County and described as follows: Project Summary: The scope of work includes but is not limited to, cleaning window glass, curtain wall, stone panels, metal panels, painted metal and concrete structural components, and all soffits. Contractor shall provide protection of public entrances with the use of construction tunnels. Contractor shall protect landscap-ing and exterior improvements. Any damage to exterior improvements shall be re-moved and replaced immediately.

Forty-Five (45) calendar days are allowed for the construction of the project. All bids must be on blank forms provided in the Specifications and submitted in its entirety. A cashier's check drawn on an Alabama bank or a Bidder's Bond, payable to Mobile County, Alabama, for an amount not less than five percent (5%) of the amount bid, but in no event more than ten thousand dollars (\$10,000), shall be filed with the proposal, the Bidder's Bond being prepared on the form specified and signed by a bonding company authorized to do business in the State of Alaba-

A Performance Bond in the form and terms approved by the County in an amount not less than the contract price will be required at the signing of the contract. A la-bor and materials bond in form and terms approved by the County in an amount not less than the contract price, insuring payment for all labor and materials, shall also be required at the signing of the contract. In addition, the Contractor must furnish to the County at the time of the signing of the contract a certificate of in-surance coverage as provided in the specifications. The right is reserved to reject any and/or all bids and to waive informalities and to furnish any item of material or work to change the amount of said Contract.

Liquidated damages for non-completion of the work within the time limit agreed upon will be assessed in accordance with the terms of the Contract.

Specifications are on file and may be seen at the office of Facilities Design and Con-struction Engineering, 7th Floor West, South Tower, Government Plaza, 205 Government Street, Mobile Alabama and at the offices of Goodwyn, Mills and Cawood Architects (GMC), at 11 North Water Street Suite 15250 Mobile, Alabama. Specifications may be obtained at the office of GMC Architects by depositing One Hundred (\$100.00) dollars for each set. This deposit shall be refunded in full to each prime Contractor Bidder upon return of the documents in reusable condition within ten (10) days after Bid Opening for up to two (2) sets. The cost of and return of additional sets of Specifications shall be in accordance with Section 39-2-3 in the code of Alabama 1975. No specifications will be issued to contractors later than twenty-four (24) hours prior to the time indicated above for receiving bids.

All prospective bidders shall have a representative present at a <u>mandatory</u> Pre-bid Conference that will be held **Tuesday**, **December 3**, 2019, at 9:00 a.m., in the Government Plaza Atrium at 205 Government Street, Mobile Alabama, 36602. All contractors not having a representative at this meeting <u>will be disqualified</u> from bidding on this project.

No bids will be considered unless the bidder, whether resident or non-resident of Alabama, is properly licensed and qualified to submit a proposal for this construc-tion in accordance with all applicable laws of the State of Alabama. This shall in-clude evidence of holding a current license from the State Licensing Board for Gen-eral Contractors, Montgomery, Alabama, as required by Chapter 8 of Title 34, of the Code of Alabama, 1975. In addition, non-residents of the State, if a corpora-tion, shall show evidence of having qualified with the Secretary of State to do busi-ness in the State of Alabama.

Prior to the award of a competitively bid contract to a contractor having one or more employees in the state of Alabama, Alabama law requires that the contractor provide the county proof of enrolment in E-Verify (see www.uscis.gov/everify).

If applicable to a contract resulting from this bid invitation, the successful bidder must comply with the Mobile County Contractor Felony Investigation, available in the Engineering Department, or online at <u>www.mobilecountypublicworks.net</u>.

No bid shall be withdrawn for a period of thirty (30) days subsequent to the open

Public Notices

any informalities, or to reject any or all bids, and to award the contract to the lowest, most responsive and responsible bidder. All bidders must comply with re-quirements of the Contractor's Licens-ing Law of the State of Alabama and be certified for the type of work on which the proposal is submitted. Each bidder must deposit with his bid, security in the amount, form and subject to the conditions provided in the Information for Bidders.

for Bidders. All Contractors preparing Bids for the referenced project shall submit a list of similar projects "successfully complete-d" in the last 5 years, having the same scope of work with construction cost similar to or greater than this project. All nonresident contractors preparing bids shall submit with the bid docu-ments evidence of a current Alabama General Contractor's License, evidence (with original seal of the State of Ala-man Secretary of State as a foreign corporation, and a Certificate of Good Standing as a Foreign Corporation from the State of Alabama Department of Revenue. Bids submitted by a nonresi-dent contractor without these docu-ments included will be rejected. Guarantee will be required with each

Guarantee will be required with each bid for at least 5% of the amount of the bid filed in the form of a certified check, Bid Bond, or irrevocable Letter of Credit acceptable to the owner payable to the Town of Shorter, AL. Bid Bonds shall include certification that the bonding company is listed in Circular 570 of the U.S. Treasury Department. The name, address, telephone number, and contact person for the bonding company shall also be included.

No bidder may withdraw his bid within 60 days after the opening thereof. Bids may be held by the Owner for a period not to exceed sixty (60) days from the date of opening of bids for the purpose of reviewing the bids and investigating the qualifications of the bidders prior to awarding the contract. This project is being funded in part by CDBG Project No. SM-ED-PF-15-004 and ARC Project No. AL-18830.

No. AL-18830. The successful bidder will be required to submit 100% performance and pay-ment bonds or an irrevocable "Letter of Credit" which is acceptable to the Own-er. All bonds and letters of credit shall be for 100% of the contract price. At-tention of Bidders is called to the li-cense required by Title 34, Chapter 8, of the code of Alabama, 1975, and amend-ments thereto, relating to the licensing of General Contractors. No bid will be accepted from anyone, except a quali-fied Contractor, licensed by the State Li-censing Board for General Contractors, unless otherwise required by the State Licensing Board.

Public Notices

owned businesses (OMBEs) and Section 3 qualified contractors in all project contract procurements.

The Town of Shorter, AL is an equal op-portunity employer.

The Honorable Willie Mae Powell, Mayor

Goodwyn, Mills and Cawood, Inc. 2660 EastChase Lane, Suite 200 (36117) Post Office Box 242128 Montgomery, Alabama 36124-2128 TEL (334) 271-3200 FAX (334) 272-1566 Mont. Adv. 11/15/2019 3895205

Chilton County is now accepting sealed bids for the placement of Hot Bitumi-nous Plant Mix on various roads in Chil-ton County. Bid spees can be picked up at the County Commission Office. Bids will be accepted until 4:00 p.m., Friday, December 6, 2019. Bids will be re-viewed on December 9, 2019 at 2:30 p.m. in the Chilton County Commission Office and presented and awarded dur-ing the scheduled Commission Meeting on December 10, 2019. Mont. Adv. 11/8, 11/15, 11/22/2019 3887130 3887130

Legal Notice

Legal Notice On November 15, 2019, the U.S. Army Corps of Engineers (USACE), Mobile District, released the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Man-uals, Alabama and Georgia. A 45-day public review period, expiring on December 30, 2019, is currently in place for parties interested in providing written or electronic comments in re-sponse to the Draft FR/SEIS. The Draft FR/SEIS and appendices are available to the public for review in the following formats: • Online as PDF documents at https://w ww.sam.usace.army.mil/Missions/Planni ng-Environmental/Allatoona-Lake-Water-Supply-Storage-Reallocation-Study-and-Updates-to-Weiss-and-Logan-Martin-Reservoirs-Project-Water-Control-Manuals/Document-Library/; • As a CD when requested in writing to: Comments may be submitted via the following methods: • Onsite at open-house style public meetings through comment forms or the court reporter; • By emailing to act-ar@usace.army.mil US Arew Corns of Engineers, Mobile

• By letter addressed to: Commander

Public Notices Public Notices ADVERTISEMENT FOR BIDS

provide the county proof of er ff applicable to a contract re- must comply with the Mobile the Engineering Department, No bid shall be withdrawn for opening of bids without the co Contractors and suppliers wis view Bids and Requests for Pr Mobile County Bid Alerts. https://www.instagram.com/MC https://www.facebook.com/MC BY: Mont. Adv. 11/15/2019 3899140	arolment in E-Verify (see www.uscis.gov/everify). sulting from this bid invitation, the successful bidder ! County Contractor Felony Investigation, available in or online at www.mobilecountypublicworks.net. a period of thirty (30) days subsequent to the onsent of the County Commission of Mobile County, hing to do business with Mobile County may now re- oposals (RFPs) on Facebook, Instagram and Twitter at obilecountybidalerts/ arts CCDUNTY COMMISSION OF MOBILE COUNTY, ALABAMA JERRY CARL, PRESIDENT	Contractors and supplie view Bids and Requests Mobile County Bid Alerts https://www.instagram.c https://www.instagram.c https://www.facebook.cc Mont. Adv. 11/15/2019 3899096	rs wishing to do business with Mobile County may now re- for Proposals (RFPs) on Facebook, Instagram and Twitter at s. on/mobilecountybidalerts/ BidAlerts m/MCCbidalerts/ COUNTY COMMISSION OF MOBILE COUNTY, ALABAMA BY: JERRY CARL, PRESIDENT Ise. righborhood. ER.COM/HOMES	All bids shall be submitted in a sealed envelope bearing on the outside the name of the Bidder, Bidder's license number, license expiration date, cate- gory, address and name of the project. Envelopes containing bids must be ad- dressed as follows, and delivered to the Honorable Willie Mae Powell, Mayor, Town of Shorter, 2521 Old Federal Road or P. O. Box 117, Shorter, AL 36075: "BID FOR SHORTER SEWER & WATER INFRASTRUCTURE IMPROVEMENTS – CDBG PROJECT NO. SM-ED-PF-15-004 and ARC PROJECT NO. AL-18830".?? The Town of Shorter, AL is an equal op- portunity employer and encourages the participation of women and minority	 b) Almy Colps of Engineers, wioble District, Atth: PD-EI (ACT-FR/SEIS), P.O. Box 2288, Mobile AL 36628. Public meetings will be held at the following locations and times: Monday, December 9, 2019, 4:00 pm-8:00 pm EST, Acworth Community Center, 4361 Cherokee Street, Acworth, Georgia 30101; (70) 917-1234. Tuesday, December 10, 2019, 4:00 pm-8:00 pm EST, Forum River Civic Center Berry/Shorter Room, 301 Tribune Street, Rome, Georgia, 30161; (706) 291-5281; Wednesday, December 11, 2019, 4:00 pm-8:00 pm CST, The Pitman Theater, 629 Broad Street, Gadsden, Alabama 35901; (256) 549-4740; Thursday, December 12, 2019, 4:00 pm-8:00 pm CST, Friends on Eight, 109 8th Avenue SW, Childersburg, Alabama 35044; (205) 296-2397.
CROSSWC By THOMAS . ACROSS 1 Charity events 6 Give over 11 Banish 12 Not called for 13 Bolshevik leader 14 Ratchet wheel parts 15 Almanac fill 17 Base on balls 18 Fluffy wraps 20 Docking site 22 Volcano product 23 Breaks, in a way 26 List of candidates 28 Abattoir waste 29 Big hit 31 Olympics jersey initials 32 Travel stops 33 Make coffee 34 Do origami 36 Bibliogra- phy abbr. 38 As a follower 40 Distant 43 Crumpet's cousin 44 Tubular	Display<	RIDEUPATEASECAFTANYLETANYLEKSIADOREADOREADOREADOREVILLEGEAPDVILLEGEAPOVILLEGGEAPPSSSSOVILLEGGAPPSSSSOTry out3Did haywork4PunchIngredient?5In thepast7RaceInito8910AAAAAAAAAAAAAAAAAAB910AAAAAAAAAAAAAAAAAAAAAAAAAA<	Unscramble these Jumbles, one letter to each square, to form four ordinary words. GELLA NOPLY PEIEDM PEIEDM BCFIRA BCFIRA Call Rights Reserved. Westerday's	SCRAMBLED WORD GAME avid L. Hoyt and Jeff Knurek why can't beat this guy? int. I beat this guy? int. I beat this guy? int. I beat this guy? I beat this guy? I beat this guy? I beat this guy? I fence is the surprise answer, as rested by the above cartoon. I concerne (Answers tomorrow) T toddLe BANANA ners worked – out AXR LOW In this sample, A is used O's, etc. Single letters, rmation of the words le letters are different. DTE OYK PAHAN A OYK PAHAN	The Draft FR/SEIS presents the results of the USACE's analysis of the environ- mental effects of the Tentatively Select- ed Plan (TSP) addressing proposed real- location of reservoir storage in Allatoona Lake to municipal and indus- trial water supply and APC-proposed modifications to flood operations at Weiss and Logan Martin reservoirs. The Final FR/SEIS is scheduled to be complet- ed and filed with the USEPA in the Fall of 2020. The Record of Decision (ROD), if appropriate, will be signed following state and federal agency review of the Final FR/SEIS, along with approval of pertinent updates to the ACT River Ba- sin Master Manual and individual proj- ect Water Control Manuals, currently anticipated to occur in the Spring of 2021. Mont. Adv. 11/15/2019 3853465 MORTGAGE FORECLOSURE SALE Default having been made in the pay- ment of the indebtedness secured by that certain mortgage executed on Au- gust 24, 2007 by Natasha T. Ellis, a mar- ried person and Darell M. Ellis, spouse, originally in favor of Wells Fargo Bank, N.A., and recorded in RLPY Book 3624 at Page 77 on September 4, 2007, in the Office of the Judge of Probate of Montgomery County, Alabama. Shapiro and Ingle, L.L.P., as counsel for Mortgagee or Transferee and under and by virtue of power of sale con- tained in the said mortgage will, on De- cember 16, 2019, sell at public outcry to the highest bidder in front of the main entrance of the Montgomery County, Alabama, Courthouse in the City of Montgomery, Cuunty, Alabama, to wit: Lot 35, Block C, according to the Map of Norris Farms Plat No. 3, as said Map ap- pears of record affecting title to said proper- ty, municipal zoning, ordnances now or hereafter becoming applicable, and tax- es or assessments hereafter becoming due against said property. Subject to mineral and mining rights. THIS IS A PURCHASE MONEY MORT- GAGE. ENTIRE PROCEEDS OF THE LOAN ARE BEING APPLIED TO THE PURCHASE PRICE OF THE HEREIN DESCRIBED REAL PROPERTY ADDRESS PROVIDED IS NOT PART OF THE LEGAL DESCRIPTION OF THE PROPERTY SOLD H
		11-15			tice of sale is being offered for sale,



US ARMY CORPS OF ENGINEERS - MOBILE DISTRICT

News Release

USACE Mobile District Extends Comment Period For Allatoona Lake Draft FR/SEIS, Weiss Logan Martin Water Control Manuals

Published Dec. 18, 2019

MOBILE, Ala. --

The U.S. Army Corps of Engineers Mobile District announces a 30-day addition to the comment period for the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Alabama and Georgia, extending the public comment period to **Jan. 29, 2020**.

"The state of Georgia and state of Alabama, along with other stakeholders, requested additional time due to the coming federal holidays and requests for additional technical information," said Col. Sebastien P. Joly, commander of the Mobile District. "We were glad to consider and agree to these requests to strengthen understanding of the technical aspects of the plan while preserving the opportunity to spend the holidays with families and friends."

The Draft FR/SEIS and appendices are available for download at <u>go.usa.gov/xVHN9</u>. The digitized files on compact discs may be requested by writing to:

 Commander, USACE Mobile District Attn: PD-EI (ACT-ACR DSEIS)
 P.O. Box 2288
 Mobile, AL 36628

Comments should be received no later than Jan. 29, 2020, by submission to one of the following:

- By e-mail to: ACT-ACR@usace.army.mil
- By letter to: Commander, USACE Mobile District Attn: PD-EI (ACT-ACR DSEIS)
 P.O. Box 2288 Mobile, AL 36628

The Tentatively Selected Plan includes the following changes:

Allatoona Lake

- Water Supply reallocation of 33, 872 acres
- Raise Summer guide curve from 840 feet to 841 feet
- Raise Winter guide curve from 823 feet to 824.5 feet

Weiss Lake

- Raise Winter level from 558 feet to 561 feet
- Lower Top of Flood Pool from 574 feet to 572 feet
- Modify Surcharge Operation

Logan Martin Lake

- Raise Winter level from 460 feet to 462 feet
- Lower Top of Flood Pool from 477 feet to 473.5 feet
- Modify Surcharge Operation

For more information, contact (251) 690-2505 or visit go.usa.gov/xVHN9.

With an area of operation across Alabama, Mississippi, Georgia, and northern Florida, and a vast military region that includes operations across Central and South America, the Mobile District's award- winning teams of engineering, construction, regulatory and emergency management professionals are nationally recognized for their leadership in delivery of the U.S. Army Corps of Engineers' civil works and military programs missions to the Nation.

Visit us on our Website <u>www.sam.usace.army.mil</u>

Like us on Facebook <u>www.facebook.com/USACEMobile/</u>

Follow us on Twitter <u>www.twitter.com/USACEMobile</u>

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or

Contact

Cesar Yabor 251-690-2505 cesar.yabor@usace.army.mil 109 Saint Joseph Street, Mobile, AL 36608

Release no. 19-054

Public Affairs 251-690-2505 cesam-pa@usace.army.mil 109 Saint Joseph Street, Mobile, AL 36608



proposed settlement agreements, on EPA Region 1's website. The NOAs will explain that EPA is reopening and reexamining specific parts of the permits. EPA will email notifications of the Draft Permit Modifications to regulated parties, the parties to this mediation, and the other interested parties on EPA Region 1's NPDES permit mailing list. The NOAs will provide for at least a 30-day public comment period that may, in EPA's discretion, be extended. Pursuant to 40 CFR 124.12(a), if EPA determines that there is a significant degree of public interest in the Draft Permit Modifications, EPA may schedule a public hearing and publish a notice of hearing on the same web page as the NOAs. In addition, at the time EPA submits the NOAs for publication, EPA will ask Massachusetts and New Hampshire to provide a water quality certification pursuant to Section 401 of the Clean Water Act, 33 U.S.C. 1341. After considering any public comments, EPA will take final action on the Draft Permit Modifications ("Final Agency Action") within nine months of the Agency's posting of the NOAs of the Draft Permit Modifications on its website.

Regarding the proposed settlement agreement between EPA and the City of Lowell, Massachusetts, EPA similarly requests only comments on the settlement agreement. The proposed settlement agreement would commit EPA to take final action on Lowell's individual permit application in accordance with 40 CFR part 124, including providing public notice of any draft permit and offering opportunities for public comments and, if requested, public hearings on the permit's substantive requirements.

II. Additional Information About Commenting on the Proposed Settlement Agreements

A. How can I get a copy of the proposed settlement agreements?

The official public docket for this action (identified by EPA–HQ–OGC– 2019–0685) contains copies of the proposed settlement agreements. The official public docket is available for public viewing at the EPA Docket Center, EPA West, Room 3334, 1301 Constitution Ave. NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566–1744, and the telephone number for the Docket Center is (202) 566–1752.

An electronic version of the public docket is available through www.regulations.gov. You may use www.regulations.gov to submit or view public comments, access the index listing of the contents of the official public docket, and access those documents in the public docket that are available electronically. Once in the system, key in the appropriate docket identification number then select "search." It is important to note that EPA's policy is that public comments, whether submitted electronically or in paper, will be made available for public viewing online at www.regulations.gov without change, unless the comment contains copyrighted material, CBI, or other information whose disclosure is restricted by statute. Information claimed as CBI and other information whose disclosure is restricted by statute is not included in the official public docket or in the electronic public docket.

EPA's policy is that copyrighted material, including copyrighted material contained in a public comment, will not be placed in EPA's electronic public docket but will be available only in printed, paper form in the official public docket. Although not all docket materials may be available electronically, you may still access any of the publicly available docket materials through the EPA Docket Center.

B. How and to whom do I submit comments?

You may submit comments as provided in the **ADDRESSES** section. Please ensure that your comments are submitted within the specified comment period.

If you submit an electronic comment, EPA recommends that you include your name, mailing address, and an email address or other contact information in the body of your comment and with any disk or CD ROM you submit. This ensures that you can be identified as the submitter of the comment and allows EPA to contact you in case EPA cannot read your comment due to technical difficulties or needs further information on the substance of your comment. Any identifying or contact information provided in the body of a comment will be included as part of the comment that is placed in the official public docket and made available in EPA's electronic public docket. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment.

Use of the *www.regulations.gov* website to submit comments to EPA

electronically is EPA's preferred method for receiving comments. The electronic public docket system is an "anonymous access" system, which means EPA will not know your identity, email address, or other contact information unless you provide it in the body of your comment. In contrast to EPA's electronic public docket, EPA's electronic mail (email) system is not an "anonymous access" system. If you send an email comment directly to the Docket without going through www.regulations.gov, your email address is automatically captured and included as part of the comment that is placed in the official public docket, and made available in EPA's electronic public docket.

Dated: December 18, 2019.

Steven M. Neugeboren,

Associate General Counsel. [FR Doc. 2019–28014 Filed 12–26–19; 8:45 am] BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-9048-6]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information 202– 564–5632 or https://www.epa.gov/nepa/.

- Weekly receipt of Environmental Impact Statements
- Filed December 16, 2019, 10 a.m. EST, through December 20, 2019 10 a.m. EST

Pursuant to 40 CFR 1506.9.

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: https:// cdxnodengn.epa.gov/cdx-enepa-public/ action/eis/search.

- EIS No. 20190296, Final, USFS, CA, Omya Sentinel & Butterfield Quarries Expansion, Review Period Ends: 01/ 27/2020, Contact: Scott Eliason 909– 382–2830
- EIS No. 20190302, Final, BLM, NV, Gemini Solar Final Resource Plan Amendment and Final EIS, Review Period Ends: 01/27/2020, Contact: Herman Pinales 702–515–5284
- EIS No. 20190303, Draft Supplement, USACE, CA, Lower Cache Creek, Yolo County, CA, City of Woodland and Vicinity, Draft Supplemental Environmental Impact Statement for the Potential Flood Risk Reduction Project, Comment Period Ends: 02/10/ 2020, Contact: Keleigh Duey 916– 557–5131

71410

- EIS No. 20190304, Final, USACE, CA, Amoruso Ranch, Review Period Ends: 01/27/2020, Contact: Leah M. Fisher 916–557–6639
- EIS No. 20190305, Draft Supplement, USFS, MT, Greater Red Lodge Vegetation and Habitat Management Project., Comment Period Ends: 02/ 10/2020, Contact: Victoria Regula 406–848–7375

Amended Notice:

EIS No. 20190272, Draft Supplement, USACE, AL, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Comment Period Ends: 01/29/2020, Contact: Jennifer Jacobson 251–690–2724

Revision to FR Notice Published 11/ 15/2019; Extending the Comment Period from 12/30/2019 to 1/29/2020.

Dated: December 20, 2019.

Robert Tomiak,

Director, Office of Federal Activities. [FR Doc. 2019–27932 Filed 12–26–19; 8:45 am] **BILLING CODE 6560–50–P**

FEDERAL COMMUNICATIONS COMMISSION

[OMB 3060-1222; FRS 16292]

Information Collection Being Submitted for Review and Approval to the Office of Management and Budget

AGENCY: Federal Communications Commission.

ACTION: Notice and request for comments.

SUMMARY: As part of its continuing effort to reduce paperwork burdens, and as required by the Paperwork Reduction Act (PRA) of 1995, the Federal Communications Commission (FCC or the Commission) invites the general public and other Federal agencies to take this opportunity to comment on the following information collection. Comments are requested concerning: Whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; the accuracy of the Commission's burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology; and ways to further reduce the information

collection burden on small business concerns with fewer than 25 employees.

The Commission may not conduct or sponsor a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. No person shall be subject to any penalty for failing to comply with a collection of information subject to the PRA that does not display a valid OMB control number.

DATES: Written comments should be submitted on or before January 27, 2020. If you anticipate that you will be submitting comments, but find it difficult to do so within the period of time allowed by this notice, you should advise the contacts listed below as soon as possible.

ADDRESSES: Direct all PRA comments to Nicholas A. Fraser, OMB, via email Nicholas_A._Fraser@omb.eop.gov; and to Nicole Ongele, FCC, via email PRA@ fcc.gov and to Nicole.Ongele@fcc.gov. Include in the comments the OMB control number as shown in the

SUPPLEMENTARY INFORMATION below. FOR FURTHER INFORMATION CONTACT: For additional information or copies of the information collection, contact Nicole Ongele at (202) 418–2991. To view a copy of this information collection request (ICR) submitted to OMB: (1) Go to the web page *http://www.reginfo.gov/* public/do/PRAMain, (2) look for the section of the web page called "Currently Under Review," (3) click on the downward-pointing arrow in the "Select Agency" box below the "Currently Under Review" heading, (4) select "Federal Communications Commission" from the list of agencies presented in the "Select Agency" box, (5) click the "Submit" button to the right of the "Select Agency" box, (6) when the list of FCC ICRs currently under review appears, look for the OMB control number of this ICR and then click on the ICR Reference Number. A copy of the FCC submission to OMB will be displayed.

SUPPLEMENTARY INFORMATION: As part of its continuing effort to reduce paperwork burdens, and as required by the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501–3520), the Federal Communications Commission (FCC or the Commission) invites the general public and other Federal agencies to take this opportunity to comment on the following information collection.

Comments are requested concerning: Whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; the accuracy of the Commission's burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology; and ways to further reduce the information collection burden on small business concerns with fewer than 25 employees.

OMB Control Number: 3060–1222. Title: Inmate Calling Services Annual Reporting, Certification, and Consumer Disclosure Requirements.

Form Number(s): FCC Form 2301(a) and FCC Form 2301(b).

Type of Review: Revision of a currently-approved collection.

Respondents: Business or other for profit.

Number of Respondents and Responses: 20 respondents; 20 responses.

Estimated Time per Response: 5 hours–80 hours.

Frequency of Response: Annual reporting and certification requirements; third party disclosure requirement.

Obligation to Respond: Mandatory. Statutory authority for this information collection is contained in 47 U.S.C. 1, 4(i), 4(j), 201, 225, 276, and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. 151, 154(i)–(j), 201, 225, 276, and 303(r).

Total Annual Burden: 2,000 hours.

Total Annual Cost: No cost. Privacy Act Impact Assessment: No impact(s).

Nature and Extent of Confidentiality: The Commission anticipates treating as presumptively confidential any particular information identified as proprietary by providers of inmate calling services (ICS).

Needs and Uses: Section 201 of the Communications Act of 1934 Act, as amended (Act), 47 U.S.C. 201, requires that ICS providers' interstate and international rates and practices be just and reasonable. Section 276 of the Act, 47 U.S.C. 276, requires that payphone service providers (including ICS providers) be fairly compensated for completed calls.

In the Second Report and Order and Third Further Notice of Proposed Rulemaking (*Second Report and Order*), WC Docket No. 12–375, FCC 15–136, the Commission undertook comprehensive reform of the ICS rules. The Commission, among other things, established new rate caps for interstate and intrastate ICS calls and limited and capped ancillary service charges. To enable the Commission to ensure compliance with the rules adopted in the *Second Report and Order* and Page intentionally blank