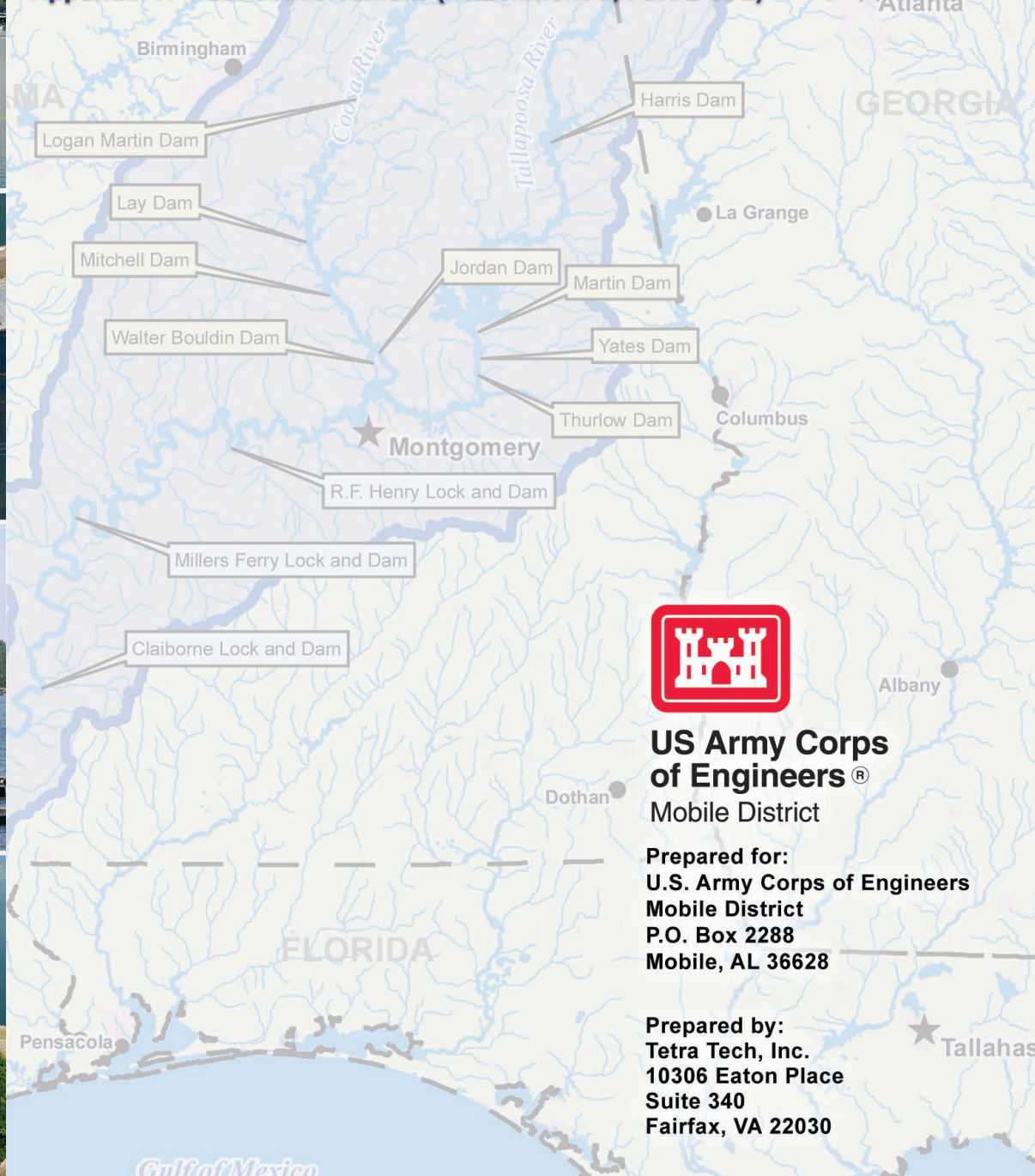


Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals

Final Feasibility Report and Integrated Supplemental Environmental Impact Statement

Appendix F. Public Involvement (Attachment 3, Part 2 of 2)



**US Army Corps
of Engineers®**
Mobile District

Prepared for:
U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, AL 36628

Prepared by:
Tetra Tech, Inc.
10306 Eaton Place
Suite 340
Fairfax, VA 22030

Attachment 3. Agency and Public Comments

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NGO-01

From: Linda Ruethemann <[REDACTED]>
Sent: Monday, November 25, 2019 1:04 PM
To: ACT-ACR
Subject: [Non-DoD Source] Draft FR/SEIS

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.

Thank you for your consideration of this request.

Linda Ruethemann

Linda Ruethemann
Secretary
Logan Martin Lake Protection Association
[REDACTED]

QUANTITY QUALITY SAFETY



From: [REDACTED] (Mike Riley)
Sent: Friday, December 06, 2019 10:16 AM
To: ACT-ACR
Subject: [Non-DoD Source] Comments on Proposed Allatoona-Coosa Reallocation in the Coosa-Tallapoosa River Basin

Commander, U.S. Army Corps of Engineers, Mobile District:

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.

A

I have these further comments regarding the Environmental Assessment (EA):

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.

B

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.

C

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.

D

Therefore I respectfully request that a permanent variance to the winter level for Logan Martin lake be granted as soon as possible

E

Thank you,

Mike



From: Mike Bearden <[REDACTED]>
Sent: Sunday, December 08, 2019 12:14 PM
To: ACT-ACR
Cc: Dean Bourne; Aaron Feldt; Linda Hartsfield; Dave Matthews; Carole Miller
Subject: [Non-DoD Source] Lake Allattoona Water Reallocation Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement
Attachments: LAA to USACE 12.9.19 re LA WR EIS.pdf

Please find attached comments from the Lake Allattoona Association dated for submission in tomorrow's open hearing for your consideration on the above subject.

Sincerely,

Mike Bearden
Lake Allattoona Association
Board of Directors



Mr. Mike Malsom
U.S. Army Corps of Engineers, Mobile District
Environment and Resources Branch
Planning and Environmental Division
P.O. Box 2288
Mobile, AL 36628-0001
E-mail: ACT-ACR@usace.army.mil Telephone: (252) 690-2023

Dear Mr. Malsom:

This is to submit Lake Allatoona Association (LAA) review comments on the Lake Allatoona Water Reallocation Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (“report”). As the Voice of Lake Allatoona, LAA is the community-based 501.c3 that brings together lake users, businesses, and agencies toward improvements in lake water quality, levels and safety for recreational use and benefits.

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.

A

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 project’s hydropower value is an insignificant 3% of the Alabama ACT hydropower system. The historical Allatoona systematic summer season water level drawdown that is detrimental to recreation uses is the direct result of hydropower uses.

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

B

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.

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 points...thus 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 options...and to reanalyze water level drawdowns to model changes that would result from changes as a result of changes A-C above.

C

The following expanded discussion on the newly recognized value of Allatoona recreational uses is organized in two parts to address the sometimes competing hydropower and water supply uses, to more fully describe the basis for the above four requested changes (with references to several of the report's sections):

1. 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 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.

D

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.

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).

E

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 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.

F

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.

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.

G

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 recreation...and 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.

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 be made to support a stabilized 840 level.

H

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.

I

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.

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.

J

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.

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.

K

Accordingly, we have offer the following:

- 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.
-

L

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 capacity; Hurricane Hollow flood storage capacity; Vineyard Mountain flood storage capacity; Pumpkinvine 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; etc.

Such options could provide water supply from the enormous and almost unquantifiable wasted 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.

-
- 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.

M

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.

-
- 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.

N

-
- 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.

O

PO Box 756

Acworth, Ga. 30101

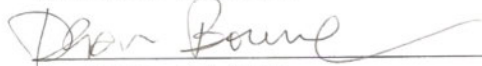
www.lakeallatoonaassoc.com

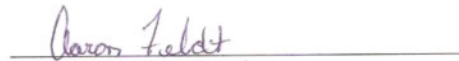
December 9, 2019

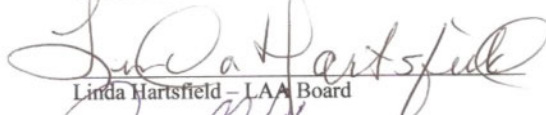


Signed on December 9, 2019 with respect,
for USACE stewardship responsibilities of Lake Allatoona


Mike Bearden – LAA Board


Dean Bourne – LAA Board


Aaron Feldt – LAA Board


Linda Hartsfield – LAA Board


Dave Matthews – LAA Board


Carol Miller – LAA Board



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-10-2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Jerry

Last Name: Culbertson, Sr.

Title: President / Member

Organization

☐ Agency
(federal, state, or
local)

☐ Congressional

☐ Company

☐ General Public

Non-Profit
Public Association

Organization: Angkas Unlimited Association

Preferred Method of Communication

☒ Phone: [REDACTED]

☒ Email: [REDACTED]

☒ Mailing
Address: [REDACTED]

Comment Categories

☒ Water Supply

☒ Flood Storage

☐ Water Management

☐ Cultural Resources

☐ Hydropower

☒ Lake Levels

☐ Threatened and
Endangered Species

☒ Navigation

☐ Economic Resources

☒ Fisheries

☐ Environmental
Resources

☐ Other

☒ Water Quality

☒ Recreation

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin

☐ Coosa Drainage Area

☐ Etowah Drainage Area

☐ Tallapoosa Drainage Area

☐ Oostanaula Drainage Area

☐ Alabama River

☐ Mobile Bay

☐ Other



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

- ① water supply - more water for Weiss Lake in winter is need.
- ② more water in winter with help Weiss Lake fishery
- ③ more water / more detention / less pollution
- ④ flood storage - to 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 + 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 winter water level.

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

I Support, Less Drawn
Down in winter on Weiss
& Logan Martin Lakes.



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

Lake Levels - Weiss Lake &
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 & Logan Martin Lakes

B

*
Note:

The Best Solution for preventing Floods
in Gadsden, AL - Neely Henry Lake would
be to widen "Minnesota Bend"
on Neely Henry Lake.

C

Thank you

Jerry Cybas

From: David A. Fitzgerald <daf@dvclaw.com>
Sent: Tuesday, December 10, 2019 5:31 PM
To: ACT-ACR
Cc: Corinne O. Milinovich; Alan Williford
Subject: [Non-DoD Source] Request for Extension to File Comments
Attachments: SeFPC Extension Letter (12.9.19).docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please find attached the request of the Southeastern Federal Power Customers, Inc. to extend the comment period for the ARC reallocation supplemental EIS. Please let us know if you encounter difficulty opening this document.

We look forward to hearing from you at your earliest convenience.

David A. Fitzgerald | Attorney
Davison Van Cleve PC
2321 Fairview Avenue East #3
Seattle, Washington 98102
T: 202-246-1356 | F: 503.241.8160
[E-mail](#) | [Web Site](#)



DAVISON VAN CLEVE

Davison Van Cleve PC

Attorneys at Law

TEL (202) 246-1356 • FAX (503) 241-8160 • daf@dvclaw.com
2321 Fairview Avenue East
#3
Seattle, Washington 98112

December 10, 2019

Via Electronic Mail

Mr. Mike Malsom
U.S. Army Corps of Engineers
Mobile District Environment and Resources
Branch Planning and Environmental Division
P.O. Box 2288
Mobile, AL 36628-0001
ACT-ACR@usace.army.mil

RE: Request to Extend Comment Deadline

Dear Mr. Malsom:

On November 15, 2019, the U.S. Army Corps of Engineers (“Corps” or “Agency”) published the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, Alabama and Georgia (“Draft FR/SEIS”) requesting public comments to be submitted by December 30, 2019.^{1/} 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.

The SeFPC represents the interests of municipally owned utilities and rural electric cooperatives that purchase power marketed by the Southeastern Power Administration which is generated at Corps multipurpose projects in the Southeast. In a letter dated August 15, 2018, the SeFPC provided the Corps with scoping comments for the Allatoona-Coosa

^{1/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (Nov. 15, 2019).

A

Reallocation (“ACR”) Study.^{2/} As such, SeFPC members are interested in the Draft FR/SEIS and will be directly affected by the outcome.

There are many examples of the Corps extending comment period deadlines.^{3/} Similarly here, it is in the public interest for the Corps to extend the public comment period to “afford the public an ample opportunity to provide substantive comments and to facilitate a timely and efficient review process.”^{4/} Pursuant to 40 CFR 1506.6(1), the USACE shall “[m]ake diligent efforts to involve the public in preparing and implementing their [National Environmental Policy Act] procedures.”

According to the Council on Environmental Quality (“CEQ”) NEPA regulations, an environmental impact statement requires federal agencies to “insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements.”^{5/} Further, pursuant to 40 CFR 1503.3(a), “[c]omments on an environmental impact statement or on a proposed action shall be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both.”

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.

B

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

^{2/} U.S. Army Corps of Engineers, 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, at 23 (Sep. 2018).

^{3/} USACE, Jordan Cove LNG Project comment period extended 30 days, available at: <https://www.nwp.usace.army.mil/Media/Public-Notices/Article/1938031/jordan-cove-lng-project-comment-period-extended-30-days/> (“[USACE] [has] determined extending the public comment period with a new comment close date...is in the public interest and is hereby granted.”); USACE, Corps to extend public comment period for Coastal Protection and Restoration study, available at: <https://www.swg.usace.army.mil/Media/News-Releases/Article/1725558/corps-to-extend-public-comment-period-for-coastal-protection-and-restoration-st/>; USACE, NISP public comment period extended, available at: <https://www.nwo.usace.army.mil/Media/News-Releases/Article/1592836/nisp-public-comment-period-extended/> (“Since the publication of the Notice of Availability and the Public Notice, the Corps has received a number of requests from the public to extend the comment period. After reviewing these requests, the Corps has determined that an additional 30 days is warranted.”); and USACE, Corps extends public comment period on Dworshak Nutrient Supplementation Environmental Assessment to March 17, available at: <https://www.nww.usace.army.mil/Media/News-Releases/Article/482325/corps-extends-public-comment-period-on-dworshak-nutrient-supplementation-enviro/> (“The Corps extended the public comment period to accommodate wider public input.”).

^{4/} U.S. Army Corps of Engineers, Public Notice of 45-Day Extension to Comment Period on Draft Environmental Impact Statement for Northern Integrated Supply Project (NISP), at 1 (Sep. 13, 2008)

^{5/} 40 CFR 1502.24.

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.

We would appreciate your prompt consideration of our request and earliest reply as possible. If you have any questions, please contact us. In the meantime, on behalf of the SeFPC, we thank you for considering this request.

Respectfully submitted,

/s/ David A. Fitzgerald

David A. Fitzgerald

Corinne O. Milinovich

Davison Van Cleve, P.C.

From: David A. Fitzgerald <daf@dvclaw.com>
Sent: Thursday, December 19, 2019 1:03 PM
To: ACT-ACR
Cc: Alan Williford; Corinne O. Milinovich
Subject: [Non-DoD Source] Request for extension

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.

A

At your earliest convenience, could you please let us know the status of our request to extend the deadline?

David A. Fitzgerald | Attorney
Davison Van Cleve PC
2321 Fairview Avenue East #3
Seattle, Washington 98102
T: 202-246-1356 | F: 503.241.8160
[E-mail](#) | [Web Site](#)



DAVISON VAN CLEVE

From: Roy McAuley <roy@manufacturealabama.org>
Sent: Tuesday, December 10, 2019 12:24 PM
To: ACT-ACR
Subject: [Non-DoD Source] Request or Extension on ACT-ACR Proposal
Attachments: Corp Extension request.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To: US Army Corps of Engineers

Manufacture Alabama's request for an extension on the ACT-ACR proposal is attached.

Roy McAuley
Manufacture Alabama

NGO-06



MANUFACTURE

Alabama!

Making the best in Alabama!

December 10, 2019

Colonel Sebastien P. Joly
Commander and District Engineer
U. S. Army Corps of Engineers
Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
Post Office Box 2288
Mobile, AL 36628- 0001

Dear Colonel Joly:

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 Alabama --Coosa-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.

Thank you for your consideration.

Sincerely,

Roy McAuley
Environmental Chair
Manufacture Alabama
Vice Chair Alabama Water Resources Commission

C: George Clark, President, Manufacture Alabama

From: Vicki Clarke <vicki.clarke@arlaw.com>
Sent: Wednesday, December 11, 2019 1:48 PM
To: ACT-ACR
Cc: Robbins, Ervin P (Patrick) CIV USARMY CESAM (USA); McCarron, Tracy M CIV USARMY CESAM (US); Blake Hale Hardwich
Subject: [Non-DoD Source] FW: COOSA-ALABAMA RIVER IMPROVEMENT ASSOCIATION - EXTENSION REQUEST
Attachments: Let to Col. Joly re Coosa-AL Extension Request (12-11-19).pdf

Hi Colonel,
I'll try this again – the last email I sent to you came back undeliverable...typo in the email address.
Thank you,
Vicki

Vicki Clarke

Legal Secretary



11 North Water Street, Suite 23200 | Mobile, AL 36602

main 251.433.3234 | **direct** 251.650.0851 |

efax 251.650.2063 | **fax** 251.438.7733

vicki.clarke@arlaw.com

[website](#) [map](#)



From: Vicki Clarke <vicki.clarke@arlaw.com>
Sent: Wednesday, December 11, 2019 12:44 PM
To: ACT-ACR@usace.army.mil
Cc: Robbins, Ervin P (Patrick) CIV USARMY CESAM (USA) <Ervin.P.Robbins@usace.army.mil>; McCarron, Tracy M CIV USARMY CESAM (US) <Tracy.M.McCarron@usace.army.mil>; Blake Hale Hardwich <Blake.Hardwich@arlaw.com>
Subject: COOSA-ALABAMA RIVER IMPROVEMENT ASSOCIATION - EXTENSION REQUEST

Good afternoon Colonel Joly,

Per Blake, see attached correspondence in this matter.

Thank you,

Vicki



December 11, 2019

Via email to ACT-ACR@usace.army.mil

Colonel Sebastien Joly, Commander
U.S. Army Corps of Engineers, Mobile District
Attn: PD-EI (ACT-ACR DESIS)
P.O. Box 2288
Mobile, Alabama 36628

Re: Request for Extension of Comment Period for the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona-Coosa Reallocation Study and Updates to Weiss and Logan Martin Water Control Manuals

Dear Colonel Joly:

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.

Colonel Sebastien Joly, Commander

December 11, 2019

Page 2

Thank you for your consideration of this request. As always, please feel free to contact me if I may provide any assistance or information.

Sincerely,

A handwritten signature in black ink that reads "E. Blake Hale Hardwich". The signature is written in a cursive, flowing style.

Blake Hale Hardwich

Executive Director

blake.hardwich@arlaw.com

BHH/vc

From: Hugh Stump <hugh@greatergadsden.com>
Sent: Wednesday, January 22, 2020 1:04 PM
To: ACT-ACR
Subject: [Non-DoD Source] Alatoona/Weiss/Logan Martin Reallocation Study

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.

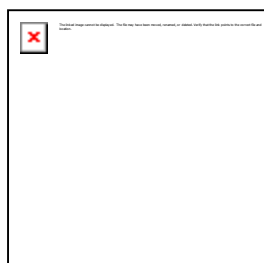
A

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.

B

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.

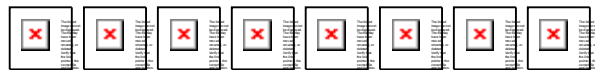
C



Hugh A. Stump III

Executive Director, [Greater Gadsden Area Tourism](#)

[O](#) 256-549-0351 [M](#) 256-504-1713 [E](#) hugh@greatergadsden.com [W](#) Blockedwww.greatergadsden.com



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"We cannot solve our problems with the same thinking we used when we created them." - Albert Einstein.

From: Blake Hale Hardwich <Blake.Hardwich@arlaw.com>
Sent: Wednesday, January 29, 2020 11:55 AM
To: ACT-ACR
Subject: [Non-DoD Source] Coosa AL USACE ACT Proposal Comments
Attachments: Coosa AL USACE ACT Proposal Comments.pdf

Please find attached comments on behalf of the Coosa-Alabama River Improvement Association regarding the USACE ACT Proposal. I appreciate the opportunity to submit these comments. If you should have any questions or concerns, feel free to contact me via email.

Thank you,

Blake Hardwich

Blake Hale Hardwich
Executive Director
Coosa-Alabama River Improvement Association
[Blockedwww.caria.org](#)
770 Washington Ave., Suite 150
Montgomery, Alabama 36104
PO Box 388
Montgomery, Alabama 36101-0388

Blake Hale Hardwich

Special Counsel



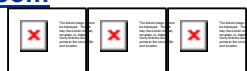
770 Washington Avenue, Suite 150 | Montgomery, AL 36104
main 334.593.5560 | **direct** 334.593.3383 | **mobile** 334.235.1718

11 North Water Street, Suite 23200 | Mobile, AL 366602
main 251.433.3234 | **direct** 251.650.0846
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20 F Street, Suite 500 | Washington, DC 20002
main 202.737.3234 | **fax** 202.737.0264

blake.hardwich@arlaw.com

[website](#) [bio](#) [vCard](#) [map](#)





January 29, 2020

Via email to ACT-ACR@usace.army.mil

Colonel Sebastien Joly, Commander
U.S. Army Corps of Engineers, Mobile District
Attn: PD-El (ACT-ACR DESIS)
P.O. Box 2288
Mobile, Alabama 36628

Re: Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona-Coosa Reallocation Study and Updates to Weiss and Logan Martin Water Control Manuals

Dear Colonel Joly:

This letter provides comments on behalf of the Coosa-Alabama River Improvement Association regarding the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (FR/SEIS) 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. Thank you for this opportunity to share our views.

About Coosa-Alabama

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.

1. 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. A

2. We Oppose the Proposed Reallocations for Water Supply.

a. The Proposal Cements and Worsens Operations That Are Negatively Impacting Water Quality in Alabama.

The Corps' existing and proposed operations impact water quality at the state line. By retaining water for upstream water supply (and recreation), the Corps is causing violations of state water quality standards in Alabama for parameters such as temperature and dissolved oxygen. In addition to the obvious impacts to environmental values and recreation, impacts to water quality restrict new development. We cannot site new industrial facilities, for example, if they cannot comply with state water quality requirements due to preexisting impacts caused by the Corps. Thus, the Corps' operations can not only can negatively affect our local environment; that, in turn, limits our local communities' ability to provide and encourage economic growth.

Section 313 of the Clean Water Act (CWA) provides that all government agencies "having jurisdiction over any property or facility . . . shall be subject to, and comply with" all federal and state water quality standards. 33 U.S.C. § 1323(a). The Corps' own regulations acknowledge the national policy for all federal facilities to comply with water quality standards. ER 1110-2-8154, ¶ 6.a (May 31, 1995). The regulations state, among other things (¶ 6.b (emphases added)):

The Corps' policy is to take a leadership role in carrying out the goals and objectives of the national policy by managing the nation's water resources that are under our control so that they are protected, maintained, and restored. . . . Corps management responsibilities extend throughout the area *influenced by* and

influencing the water we manage. . . . This strategy must be developed in concert with other authorized project purposes. However, the environment will be addressed as *equal in value and importance to other project purposes* when developing or carrying out management strategies. The Corps *will, at least, manage its projects in accordance with all applicable Federal and state environmental laws, criteria, and standards*.

Corps divisions are directed to “[e]nsure that water quality, as affected by the project and its operation, is suitable for project purposes, existing water uses, and public health and safety and *is in compliance with applicable Federal and state water quality standards*.” *Id.*, ¶ 8.a (emphases added).

Thus, the CWA and the Corps’ own regulations require the Corps to comply with state water quality standards in the area “influenced by” the Corps’ reservoir, which means not only locally but downstream as well. Water quality considerations are to be “equal in value and importance to other project purposes,” according to the Corps’ regulations. In order for the Corps to comply with these requirements, the Corps must determine the effects of its actions on water quality.

With those concerns in mind, we provide the following specific comments:

B

- (1) 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.

-
- (2) The Corps should not approve reallocations for the sake of water supply that cause violations of state water quality standards downstream.

C

-
- (3) 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.

D

b. The Proposal Exceeds the Corps’ Statutory Authority.

We are aware of no principled basis in the authorizing documents for Allatoona and Carters to find water supply as among the original, Congressionally authorized project purposes for those projects. That means the sole authority for any reallocation for local water supply is the Water Supply Act, which provides as follows (43 USCA § 390b(e)) (emphasis added):

Modifications of a reservoir project heretofore authorized, surveyed, planned, or constructed to include storage [for water supply] 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.

In other words, a reallocation for water supply is prohibited if it would “seriously affect” existing project purposes or constitute a “major structural or operational change,” unless Congress changes the law. The Corps’ own regulations provide clear, objective criteria to identify a proposed reallocation for water supply that presumptively does not exceed the statutory prohibition: “15 percent of total storage capacity allocated to all authorized purposes or 50,000 acre feet, whichever is less.” ER 1105-2-100, ¶ 3-8(b)(5) (Apr. 22, 2000). An allocation of even that limited magnitude also requires a finding of compliance with the “seriously affect” and “major structural or operational change” standards of the WSA. To allocate storage for water supply beyond either threshold triggers the extraordinary step of securing the personal approval of the Secretary of the Army (and, again, a finding of compliance with the statutory standards). Given that the Corps has withdrawn its proposed regulations for water supply, this is Corps’ own governing regulatory standard.

The effects of water supply withdrawals on downstream users are likely to be especially pronounced during low-inflow conditions. At such times, withdrawals are likely to increase as individual water users consume more in response to the lack of local rainfall. Further, stormwater volumes also decrease in response to drought conditions. It is also important to measure low-inflow conditions in a manner that reflects the true impacts on affected communities at the times those impacts occur. That means specific consideration of the precise moments when flows are low. While we recognize it is necessary to quantify large volumes of flow data to allow meaningful quantitative analysis, and that typically includes averages over various lengths of time, any use of aggregated or averaged data tends to obscure phenomena at the extremes. That, in turn, tends to hide the effects associated with low-inflow conditions. Those effects can be extremely serious, even when conditions persist for relatively brief stretches of time.

With those concerns in mind, we offer two comments in this area:

- (1) 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.”

E

-
- (2) 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.
-

F

c. Accounting Methodology

Current policy of the Corps credits return flows proportionally to all users. That policy should continue. We are especially concerned about any change in policy that could introduce a bias toward expanding consumption for local water supply to the extent water utilities are allowed to credit return flows to allow greater withdrawals. This is especially problematic at reservoirs such as Allatoona where the original Congressional authorization for water supply was limited or nonexistent, in that it disrupts long-held expectations of how much water is diverted away from other authorized purposes.

The Corps should specifically take care to ensure its use of terminology related to return flow is accurate and descriptive. For example, we question whether “made” water truly exists in the absence of an external source such as a desalinization plant or a transfer from outside the basin. To the extent the Corps considers “made” water at all, there should be careful and clear analysis showing how any “made” water is in excess of the volume that otherwise would exist.

Any further consideration of return flows should account for the significant effects associated with the timing of return flows. Specifically, during times of heavy precipitation, the value of additional water returned to the reservoir is minimal. The counterparties to the Corps’ water supply agreements should not be allowed to withdraw beyond a fixed contract quantity when water is scarce on the basis of credits for returns provided when water is abundant.

We are also aware of instances where a reservoir is constructed upstream from a Corps reservoir, with releases traveling downstream to the Corps project. Obviously, such a reservoir is within the same basin as the Corps reservoir, and flows from the upstream reservoir would have reached the Corps project at one time or another anyway, with or without the intervening impoundment. The operator of such a reservoir should not be allowed to stake a greater claim than it would otherwise be entitled to under the Corps’ current return flow policy based on its temporary impoundment of the same water, especially if the reservoir was constructed when the current Corps policy was in effect.

In light of those considerations, we provide the following specific recommendations:

(1)	The Corps should continue the current practice of crediting return flows proportionally across all users.	G
(2)	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.	H
(3)	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.	I

d. Enforcement

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:

- | | | |
|-----|--|---|
| (1) | clearly establish that the Corps will monitor withdrawals under any agreement entered into pursuant to the regulations; | J |
| (2) | explain how compliance with the agreement is to be measured and determined; | K |
| (3) | 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; and | L |
| (4) | 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. | M |
-

Thank you for your consideration of these comments. As always, please feel free to contact me if I may provide any assistance or information.

Sincerely,



Blake Hale Hardwich
Executive Director
Coosa-Alabama River Improvement Association
blake.hardwich@arlaw.com

From: Sarah Stokes <sstokes@selcal.org>
Sent: Wednesday, January 29, 2020 1:33 PM
To: ACT-ACR
Cc: Cindy Lowry (clowry@alabamarivers.org); Steven Dudley (steven@coosariver.org); Justinn Overton (justinn@coosariver.org)
Subject: [Non-DoD Source] SELC Comments on SEIS for Allatoona, Weiss, and Logan Martin Operational Changes
Attachments: 2020.01.29 SELC Comments on Corps' SEIS for Allatoona, Weiss, and Logan Martin Changes.PDF

Commander,
Attached, please find comments on the *Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals; Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement* from the Southern Environmental Law Center on behalf of the Coosa Riverkeeper and Alabama Rivers Alliance.

Best,
Sarah

Sarah Stokes
Senior Attorney
Southern Environmental Law Center
2829 2nd Ave South, Suite 282
Birmingham, AL 35233
205-745-3060

January 29, 2020Sent Via U.S. Mail and Email

Commander
U.S. Army Corps of Engineers
Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
P.O. Box 2288, Mobile, AL 36628
act-acr@usace.army.mil

**Re: Allatoona Lake Water Supply Storage Reallocation Study and Updates to
Weiss and Logan Martin Reservoirs Project Water Control Manuals; Draft
Feasibility Report and Integrated Supplemental Environmental Impact
Statement**

Dear Commander,

The Southern Environmental Law Center submits these comments on behalf of the Alabama Rivers Alliance and the Coosa Riverkeeper. This Supplemental Environmental Impact Statement (SEIS) does not contain the best available information and must be updated. An SEIS must use “the best scientific and commercial data available.” 16 U.S.C. § 1536(a)(2). Further, the cumulative impact analysis is inadequate as it does not add the present action to the past actions, but merely compares the two. “Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 40 C.F.R. § 1508.7.

I. 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

¹ U.S. Army Corps of Engineers, Mobile District, *Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals; Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement*, November 2019, available at https://www.sam.usace.army.mil/Portals/46/docs/planning_environmental/act/ACR_Study_DSEIS/01%20ACR%20Draft%20Integrated%20FR%20SEIS_Main%20Report.pdf?ver=2019-11-14-154524-810.

concentration; “[t]he operation of the blower systems to maintain the 4 mg/L DO concentration was included in the HEC-5Q model simulations.” SEIS, Appendix E-222.

However, this 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 Coosa 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 from 57.7% to 81.6%.⁵ This means that one-fifth of the time that APC measured, the DO at Logan Martin is not above 4.0 mg/L. At Weiss, the DO dropped to 1.1 mg/L in June, 1.6 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 sometimes 18 hours at a time.⁷ This low DO must be built into the model as well as the percentage of time that the DO is below 4.0 mg/L at Weiss. A 0.16 mg/L decrease 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 obtain the most current DO data from Alabama Power and use that in the model, and this data should be fully available to the public in this SEIS.

II. 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.

B

² Accession, 20190408-5198, Alabama Power’s Response to the Jan. 8, 2019 Additional Information Request, Answer 11, p. 3 (attached as Exhibit 1).

³ *Id.* at 6, 7, 9, 10.

⁴ *Id.* at 4, 5.

⁵ Accession, 20190408-5198, Alabama Power’s Response to the Jan. 8, 2019 Additional Information Request, Answer 14, p. 3 (attached as Exhibit 2).

⁶ Accession, 20190408-5198, Alabama Power’s Response to the Jan. 8, 2019 Additional Information Request, Answer 11, p. 4 (attached as Exhibit 1).

⁷ *Id.* at 6.

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.

III. 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. C

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 basin have already occurred.” SEIS, Appendix E-272. This description is inadequate. SEIS must fully consider the degraded 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.

IV. 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. D

Cumulative impact is the impact on the environment “when added to other past, present, and reasonably foreseeable future actions regardless of [whether the Corps] undertakes such other actions.” 40 C.F.R. § 1508.7. Regardless of whether the 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.

In sum, the direct and cumulative impacts that this action will have on species and water quality must be better explained with information that is currently available. Thank you for your consideration of these comments. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Stokes".

Sarah Stokes
Senior Attorney

EXHIBIT 1

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

The Federal Energy Regulatory Commission (FERC) Additional Information Request is presented in italics followed by Alabama Power Company's response in normal text.

Aquatic Resources

11. *Article 408 of the now-vacated June 20 Order required Alabama Power to file a plan for implementing the water quality monitoring requirements of the state's water quality certification. Alabama Power was required to monitor dissolved oxygen and water temperature downstream of the project developments at all times (i.e., during generation and non-generation periods) for a period of three years, beginning May 1, 2018, and file with the Commission by April 30, 2019 through 2021, annual reports that verify compliance with the requirements of the water quality certification. The annual reports were required to contain the previous year's water quality monitoring data acquired during generation. Alabama Power was also required to file with the Commission, by July 29, 2021, a final report that includes all water quality data (i.e., data collected during generation and non-generation periods) collected during the three year monitoring period and an analysis of the water quality data collected during generating versus non-generating periods. The purpose of the final report is to document improvements in water quality resulting from the implementation of Alabama Power's Dissolved Oxygen Enhancement Plan and to ensure that dissolved oxygen levels during non-generation periods are sufficient to protect and enhance aquatic resources in the Coosa River.*

In a November 29, 2018 filing, Alabama Power states that it is continuing to voluntarily monitor water quality in anticipation of the need for additional data to support the Commission's efforts in developing an EIS. To allow Commission staff to analyze the effectiveness of the project's aeration systems at increasing downstream dissolved oxygen levels, please file a water quality monitoring report that contains the following information:

a. A detailed description of all water quality monitoring locations, the monitoring equipment used (including information on equipment maintenance and calibration), and the frequency and duration of monitoring.

b. The raw water quality monitoring data (i.e., water temperature and dissolved oxygen data) collected in 2018 during periods of generation and periods when no generation or discharge was occurring, in electronic format. This data should also: (1) quantify the discharge rate of water flow passing through each turbine or spillage into the Weiss bypassed reach at the time of data collection; and (2) specify the operational status of the aerators at the time of data collection.

c. A summary that describes: (1) the monthly minimum, mean, and maximum dissolved oxygen levels in the tailrace of each development for periods of generation and periods when no generation or discharge was occurring; and (2) the frequency and duration (i.e., number of events each month and the duration in hours of each event) that dissolved oxygen levels in each development's tailrace did not meet 4.0 and 5.0 milligrams per liter (mg/L), for periods of generation and periods when no generation or discharge was occurring, respectively.

Alabama Power Company Response to "a"

Article 408 of the vacated license required Alabama Power to file a Water Quality Monitoring Plan ("WQMP") to implement the conditions of the Water Quality Certification ("WQC") issued by the Alabama Department of Environmental Management ("ADEM"). FERC also included additional requirements to be included in the WQMP for collection of non-generation data, separate from the WQC requirements. Under the approved WQMP, for each data entry Alabama Power would categorize the status of the unit as either "generating," or "non-generating." All data not required to be reported under the WQC would be categorized as "non-generating."

Alabama Power Company
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Alabama Power has continued to voluntarily monitor water quality since vacatur of the license. However, in order to maintain consistency between the data provided in response to Question 11 and the data provided in response to FERC's November 27, 2013, Additional Information Request ("AIR"), the data is categorized slightly differently than it would have been under the WQMP.

Specifically, for each data entry, the status of the unit is categorized as either "generating," "non-generating," or "partial." Alabama Power has flagged all full hours of generation as "generating," even though for purposes of reporting data under the WQC and WQMP the first full hour would be flagged as "non-generating." For purposes of summary and statistical analyses, all partial hours are included in non-generation.

Tables 1 and 2 below provide the locations of monitors in each tailrace used to collect water quality data as well as the applicable monitoring periods.

Table 1. Bank Monitor¹ Locations

Development	Monitor Location (Latitude [N], Longitude [W])	Monitoring Period
Weiss	34.13115, -85.79418	May 1 through September 30
Weiss Bypass	34.17031, -85.75258	May 1 through September 30
Neely Henry	33.77815, -86.04761	May 1 through September 30
Logan Martin	33.41014, -86.34548	May 1 through November 30
Lay	32.96148, -86.51925	May 1 through September 30
Mitchell	32.80393, -86.44542	May 1 through September 30
Jordan	32.61384, -86.25506	May 1 through November 30
Bouldin	32.58211, -86.28191	May 1 through September 30

Table 2. River Monitor² Locations

Development	Monitor Location (Latitude [N], Longitude [W])	Monitoring Period
Weiss	34.12804, -85.80125	May 1 through September 30
Neely Henry	33.76886, -86.04463	May 1 through September 30
Logan Martin	33.41061, -86.34595	May 1 through September 30
Lay	32.95412, -86.51465	May 1 through September 30
Mitchell	32.79294, -86.43021	May 1 through September 30

¹ Although both generation and non-generation data is being provided from the Bank Monitors to be consistent with the 2014 AIR, Bank Monitors were placed for purposes of determining water quality during periods of generation, consistent with the WQC. Data collected from the Bank monitors during non-generation was not obtained for purposes of measuring or evaluating water quality during periods of non-generation, and the recorded monitor readings have not been subjected to Alabama Power's QA/QC protocols. Therefore, non-generation data from the Bank Monitors is unreliable and should not be used to represent water quality during periods of non-generation.

² To be consistent with the 2014 AIR, both generation and non-generation data is being provided from the River Monitors. However, the River Monitors were placed for purposes of determining water quality during periods of non-generation.

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The Bank Monitors use a Hach Model 2 luminescent dissolved oxygen (LDO) sensor connected to a Hach SC200 controller. The River Monitors use a Hydrolab HL7 multiparameter sonde equipped with a wiped LDO sensor. Both monitors utilize the LDO technology and are calibrated using the manufacturer's recommendation or the Winkler Method 360.2 of the Environmental Protection Agency's (EPA) Method for Chemical Analysis of Water and Wastes, latest edition, American Society for Testing and Materials ASTM D888-05 Standard Test Methods for Dissolved Oxygen in Water (Test Method C Luminescence-Based Sensor Procedure), or other equivalent methods. Maintenance and calibration at each monitoring site are performed at a minimum every 7-10 days unless conditions prohibit access to the instrument.

Alabama Power Company Response to "b"

As noted in response to 11a, the data provided in this filing is consistent with how similar data was provided in response to FERC's November 27, 2013 AIR to Alabama Power.

Alabama Power notes that the Water Quality Certificate (WQC) allows Alabama Power to temporarily discontinue monitoring during flood events. Data may be included in response to this AIR that was collected during flood control but would not have been reported to the Alabama Department of Environmental Management (ADEM) consistent with the WQC and Water Quality Monitoring Plan (WQMP). Additionally, Alabama Power notes that, with two exceptions described below, where flow data from the Jordan Project is shown on the spreadsheets below 2000 cfs, the minimum flow requirement was being met by the addition of seepage flows. One exception occurred on November 30, resulting from a total plant outage related to a shield wire replacement for transmission lines. The second exception occurred on August 27, following the Jordan Unit 2 upgrade. In both instances, minimum flow was met by spilling.

Alabama Power Company Response to "c"

The summary of the water quality data collected in 2018 is provided in the tables below. 2018 was the commissioning of the newly installed aeration systems at Weiss, Neely Henry, and Logan Martin developments. As with the installation of any complex equipment, certain mechanical issues were experienced, such as bearing overheating, blower surge, high vibrations, etc. Some of these issues resulted in a trip of the blower system. These mechanical issues have been remedied.

Alabama Power Company
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Table C-1: Statistical Summary of 1-hour Dissolved Oxygen Data (in mg/L) Collected in 2018 at the Coosa River, Mitchell and Jordan Projects (G=Generation; NG=Non-generation)

Weiss Development																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	5.4	5.8	3.7	1.1	4.1	1.6	4.4	1.8	4.6	0.6	n/a	n/a	n/a	n/a	5.7	4.5	4.4	2.7	4.4	1.2	4.5	2.0	4.4	1.4	n/a	n/a	n/a	n/a
Mean	6.9	8.6	6.4	6.4	6.1	6.1	6.2	5.6	6.0	5.3	n/a	n/a	n/a	n/a	7.6	7.1	6.5	5.0	6.0	4.5	6.2	4.3	6.1	4.8	n/a	n/a	n/a	n/a
Max	9.4	11.0	9.3	10.8	8.2	8.6	8.1	9.1	8.7	7.7	n/a	n/a	n/a	n/a	10.2	9.8	9.9	8.7	8.0	6.8	8.2	6.6	9.0	8.0	n/a	n/a	n/a	n/a
Henry Development																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	4.9	4.5	4.3	3.2	4.0	3.0	4.3	3.8	4.1	3.2	n/a	n/a	n/a	n/a	5.1	4.3	4.4	3.2	4.5	2.9	4.3	1.8	4.6	1.0	n/a	n/a	n/a	n/a
Mean	6.5	7.0	6.2	5.2	6.1	5.2	6.3	5.5	5.4	4.7	n/a	n/a	n/a	n/a	7.3	6.8	6.3	4.9	6.2	4.4	66.2	4.1	5.6	3.5	n/a	n/a	n/a	n/a
Max	10.6	10.3	9.5	8.0	7.8	7.5	7.4	7.0	7.8	6.7	n/a	n/a	n/a	n/a	10.6	10.3	9.4	8.1	9.4	6.9	9.7	7.2	8.5	6.7	n/a	n/a	n/a	n/a
Logan Martin Development																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	3.6	1.4	3.4	0.7	1.1	0.1	3.1	1.1	3.9	0.4	4.7	1.2	3.6	3.5	4.0	1.5	3.4	0.7	1.6	0.2	4.0	1.6	3.4	0.7	4.3	1.1	4.0	3.9
Mean	6.2	5.4	6.1	4.4	6.8	4.5	6.6	5.1	6.5	5.0	6.7	5.2	8.1	6.3	6.3	5.2	5.7	4.3	5.9	4.0	5.9	4.5	5.8	4.8	6.2	6.9	8.2	6.3
Max	8.8	9.5	9.1	7.9	8.7	8.3	8.5	8.2	8.1	8.3	8.5	8.6	9.4	8.8	8.9	8.3	8.0	7.4	7.4	6.7	7.5	7.3	7.5	7.3	7.5	11.9	10.4	8.6
Lay Development																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	4.7	4.5	4.1	4.1	3.8	2.6	4.0	2.5	4.0	2.0	n/a	n/a	n/a	n/a	5.1	3.7	4.3	2.4	4.5	0.7	4.9	2.1	3.9	1.8	n/a	n/a	n/a	n/a
Mean	6.0	6.3	5.6	5.0	5.2	4.6	5.7	4.6	5.3	4.2	n/a	n/a	n/a	n/a	6.9	6.1	5.9	4.0	6.0	2.9	6.3	3.7	5.8	3.7	n/a	n/a	n/a	n/a
Max	9.0	8.6	7.5	6.6	6.5	7.1	7.4	6.3	6.9	6.3	n/a	n/a	n/a	n/a	9.8	8.5	8.2	6.6	7.7	6.4	7.7	6.0	6.8	6.3	n/a	n/a	n/a	n/a

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Mitchell Project																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	4.8	4.8	4.5	4.5	2.2	1.1	3.4	1.1	3.2	3.1	n/a	n/a	n/a	n/a	5.0	3.0	4.4	3.7	3.7	3.0	4.6	3.0	3.2	3.1	n/a	n/a	n/a	n/a
Mean	5.8	6.3	6.1	5.9	5.3	4.2	5.6	4.2	5.8	4.3	n/a	n/a	n/a	n/a	7.0	6.9	5.9	5.5	5.2	5.2	5.5	4.9	5.9	4.6	n/a	n/a	n/a	n/a
Max	8.8	8.7	7.3	7.0	6.1	7.3	6.9	6.1	8.3	6.2	n/a	n/a	n/a	n/a	9.8	8.7	7.5	7.5	6.3	6.7	6.8	5.9	9.1	7.8	n/a	n/a	n/a	n/a

Bouldin Development																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.0	5.8	2.9	5.7	4.6	1.8	4.3	4.7	3.9	3.7	n/a	n/a	n/a	n/a
Mean	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	7.9	9.4	6.7	7.5	6.0	6.2	5.7	6.1	5.4	6.3	n/a	n/a	n/a	n/a
Max	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	11.5	11.0	10.1	9.1	7.3	8.0	7.2	8.9	7.0	8.7	n/a	n/a	n/a	n/a

Jordan Project																												
	River Monitor														Bank Monitor													
	May		Jun		Jul		Aug		Sep		Oct		Nov		May		Jun		Jul		Aug		Sep		Oct		Nov	
	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N	G	N
Min	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	5.5	n/a	4.8	n/a	4.9	n/a	5.1	n/a	4.7	n/a	5.2	n/a	7.4	n/a
Mean	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	6.9	n/a	6.3	n/a	6.0	n/a	6.5	n/a	6.3	n/a	7.5	n/a	9.7	n/a
Max	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	9.1	n/a	8.0	n/a	6.7	n/a	7.7	n/a	7.7	n/a	8.8	n/a	11.4	n/a

There are no periods of non-generation for the Jordan Development because of continuous minimum flow required by Article 405 of the now vacated 2013 Project license.

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Table C-2: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Weiss Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	3	0	0	0	0	0	0	0	0	0	0	4	10	18	0	4	4	11	7
2	0	0	0	0	0	0	0	0	0	0	0	2	2	2	5	0	0	2	4	3
3	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3	0	3	2	2	2
4	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	3	2	6
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	1
6	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2	1	0	2
7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	1	0
8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	0
9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	4	0
10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0
11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0

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Table C-3: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the Bank and River Monitors in the Neely Henry Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	0	0	0	0	0	0	0	0	0	0	5	4	1	0	0	1	4	11	5
2	0	0	0	0	0	0	0	0	0	0	0	3	3	0	2	0	4	4	3	2
3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	2
4	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	1	0	3	0
5	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	2	2
6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2
7	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	0	0	1	0	1
8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
9	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	1	2	1
10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2
11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	1	1
12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	3
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	2
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	3
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1

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Table C-4: Number and Duration of Events During May - November 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the Bank and River Monitors in the Logan Martin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)							Bank Monitor (G)							River Monitor (NG)							Bank Monitor (NG)						
	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV
1	1	3	2	2	1	0	1	0	2	4	0	0	0	0	2	6	23	20	22	12	1	2	3	14	10	15	5	1
2	0	0	1	0	0	0	0	0	0	1	0	0	0	0	1	5	12	9	13	3	0	6	6	2	9	17	1	0
3	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	5	9	8	20	5	0	1	3	6	3	8	3	0
4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	4	4	3	5	4	1	3	4	1	1	1	1	0
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	8	0	2	0	1	0	5	2	0	1	1	1	0
6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	4	1	1	0	0	0	1	4	1	1	1	0	0
7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	3	1	3	0	0	0
8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	0	0	1	0	0	1	2	1	1	0	0
9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0	0	0
10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	1	1	0	0	0	0
11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0
12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0

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Table C-5: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the Bank and River Monitors in the Lay Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	0	1	0	0	0	0	0	0	1	0	0	6	6	16	0	2	1	7	3
2	0	0	1	0	0	0	0	0	0	0	0	0	0	2	2	1	2	4	5	3
3	0	0	0	0	0	0	0	0	0	0	0	0	1	2	1	0	1	1	3	2
4	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	0	1	2	1
5	0	0	0	0	0	0	0	0	0	0	0	0	4	3	3	0	1	2	1	0
6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	5	1
7	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	1	3	1	1
8	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	1	1	4	1
9	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	4	5	0	3
10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	4	3	2
11	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	1	3	0	1
12	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	3	3	5
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	1
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	2
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0

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Table C-6: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Mitchell Project Tailrace (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	0	1	1	1	0	0	1	0	1	0	0	2	6	11	0	1	1	4	6
2	0	0	0	0	0	0	0	0	0	2	0	0	2	0	3	1	0	0	2	4
3	0	0	0	0	0	0	0	0	0	2	0	0	1	1	5	0	0	1	0	1
4	0	0	0	0	0	0	0	0	0	1	0	0	2	1	2	0	0	1	0	1
5	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	1
6	0	0	0	0	0	0	0	0	0	0	0	0	3	1	0	0	0	1	0	0
7	0	0	0	0	1	0	0	0	0	0	0	0	2	0	0	0	0	0	0	1
8	0	0	0	0	1	0	0	0	0	0	0	0	1	0	4	0	0	0	0	0
9	0	0	0	0	0	0	0	0	0	0	0	0	5	2	1	0	0	0	0	0
10	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0
11	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0
12	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0
13	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0

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Table C-7: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Bouldin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	n/a	n/a	n/a	n/a	n/a	1	1	0	0	1	n/a	n/a	n/a	n/a	n/a	0	0	1	0	1
2	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	1

Note: There were no events less than 4.0 mg/L at the Jordan Project tailrace during May - November 2018.

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Table C-8: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Weiss Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	8	3	5	1	0	4	3	0	4	0	7	5	9	18	0	3	6	8	14
2	0	1	2	1	3	0	3	4	2	2	0	3	1	6	11	1	6	3	3	6
3	0	0	0	1	0	0	1	1	0	1	0	1	3	5	6	0	2	8	3	3
4	0	2	0	1	0	0	1	0	0	0	0	2	2	2	1	0	0	3	0	1
5	0	2	0	0	0	0	0	1	0	0	0	2	0	2	3	0	1	0	0	1
6	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	2
7	0	0	1	0	0	0	0	1	1	0	0	0	1	3	2	0	2	0	3	0
8	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	2	5	2	1
9	0	0	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	1	5	1
10	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2	3	3
11	0	1	0	0	0	0	1	0	0	0	0	1	0	0	1	0	3	1	1	1
12	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	3
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	2
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0
20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0

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Table C-9: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Neely Henry Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	11	2	3	15	0	1	3	6	10	1	0	4	1	2	4	2	2	4	1
2	1	1	0	2	6	0	2	0	1	6	0	2	3	1	2	2	0	1	3	0
3	0	0	1	1	3	0	1	0	0	2	0	0	1	1	2	2	2	1	2	2
4	0	2	0	0	1	0	1	0	1	1	0	0	2	0	0	0	1	3	1	0
5	0	1	2	0	1	0	1	0	0	1	1	1	1	1	1	0	1	4	1	0
6	0	1	0	0	2	0	0	0	0	1	0	1	1	0	0	1	1	2	3	0
7	0	0	0	0	2	0	0	0	0	0	0	1	0	0	0	0	3	3	1	0
8	0	0	0	0	1	0	0	0	0	1	0	2	2	0	0	0	1	6	1	0
9	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	3	3	0
10	0	0	0	0	0	0	0	0	0	0	0	3	2	1	1	0	3	1	2	2
11	0	0	0	0	0	0	0	0	0	0	0	1	0	0	3	0	3	1	2	2
12	0	0	0	0	0	0	0	0	1	0	0	1	2	0	0	0	2	1	1	4
13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	3	0	3
14	0	0	0	0	0	0	0	0	0	0	0	2	0	0	3	0	0	1	2	2
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	3	3
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	1	2
17	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	1	1	3
18	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	1	2
19	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
20	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
21	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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Table C-10: Number and Duration of Events During May - November 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Logan Martin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)							Bank Monitor (G)							River Monitor (NG)							Bank Monitor (NG)						
	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV
1	11	30	7	6	4	2	2	17	30	15	6	10	2	2	5	6	20	15	16	12	2	2	1	2	4	5	13	2
2	4	3	1	0	0	0	0	2	6	3	2	0	0	0	1	2	10	13	9	5	1	1	1	6	5	7	2	1
3	3	0	0	1	0	0	0	1	1	0	0	1	0	0	0	8	6	6	13	3	1	3	5	7	5	5	2	0
4	0	1	0	0	1	0	0	2	0	1	1	1	0	0	0	4	9	11	19	7	0	2	2	5	3	8	4	0
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	4	3	1	5	3	0	4	7	3	5	4	1	1
6	0	0	0	0	0	0	0	0	0	0	0	1	0	0	6	4	1	0	0	2	1	4	2	2	3	5	2	0
7	1	0	0	0	0	0	0	1	1	0	1	0	0	0	1	2	0	1	2	0	0	2	1	1	1	2	1	0
8	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	1	3	0	2	0	0	1	0	2	4	0	0
9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	1	0	2	2	2	2	1	0	0
10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	1	0	0	2	0	2	1	0	0
11	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	2	1	0	0	0	0	3	1	2	2	0	0
12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	3	1	0	0
13	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	1	0	0	0
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0
15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0	0	2	0	0	0	0
16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0
17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	1	0	0
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	1	0	0	0
19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	1	0	0
20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0

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Table C-71: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Lay Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	0	1	10	4	10	0	10	6	2	1	1	1	3	2	4	0	3	0	0	2
2	2	4	2	4	4	0	5	1	0	1	0	1	0	2	0	0	2	0	0	1
3	0	2	6	0	1	0	7	2	0	0	1	0	1	3	0	2	1	3	3	0
4	3	3	2	1	1	0	0	0	0	0	0	0	3	2	0	1	2	3	0	1
5	0	4	1	1	2	0	0	1	0	0	1	0	1	1	0	4	0	0	2	0
6	0	1	2	0	2	0	0	0	0	0	1	1	1	0	0	0	1	3	0	0
7	0	0	1	1	1	0	0	0	0	1	0	1	0	0	0	0	2	2	1	1
8	0	1	1	0	1	0	0	0	0	0	0	1	2	2	0	0	2	5	1	1
9	0	0	1	0	0	0	1	0	0	0	0	1	1	1	1	0	3	1	3	0
10	0	0	0	0	0	0	0	0	0	0	0	2	3	2	1	0	2	4	2	3
11	0	0	2	1	0	0	0	0	0	0	0	2	5	1	1	0	4	5	2	0
12	0	0	1	0	0	0	0	0	0	0	0	0	2	2	5	0	1	3	2	4
13	0	0	0	0	1	0	0	0	0	0	0	0	0	1	1	0	1	1	5	4
14	0	0	0	1	0	0	0	0	0	0	0	0	1	3	4	0	1	2	2	1
15	0	0	1	0	1	0	0	0	0	0	0	0	0	2	1	0	0	1	0	1
16	0	1	0	1	0	0	0	0	0	0	0	0	1	1	2	0	0	1	2	2
17	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	0	1	0	1	5
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	1
19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

Table C-82: Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Mitchell Project Tailrace (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	1	0	4	4	4	0	4	12	2	4	0	0	4	3	1	1	7	9	13	3
2	2	1	5	2	5	0	4	5	7	5	0	0	2	0	0	1	3	6	4	1
3	1	0	4	2	5	0	2	3	3	1	1	0	0	0	1	0	3	1	8	1
4	1	0	0	1	1	0	2	0	1	0	0	0	2	1	0	1	1	5	7	2
5	0	0	0	0	0	0	1	3	2	0	1	0	2	3	0	0	1	7	9	1
6	1	0	0	0	3	0	1	1	0	4	0	0	1	1	2	0	3	1	2	4
7	0	0	2	1	2	0	1	1	1	2	0	0	2	2	1	0	1	2	4	2
8	0	0	1	1	0	0	0	2	0	2	0	0	1	0	1	0	0	1	1	0
9	0	0	0	0	1	0	0	0	0	1	0	0	2	2	1	0	0	0	0	1
10	0	0	1	1	2	0	1	1	1	4	0	1	3	0	3	0	0	0	0	2
11	0	0	2	1	0	0	0	1	1	0	0	0	4	0	1	0	0	0	0	0
12	0	0	0	1	0	0	0	0	0	1	0	0	4	2	3	0	0	0	0	4
13	0	0	0	0	0	0	1	0	0	0	0	0	2	1	1	0	0	0	0	1
14	0	0	1	0	1	0	1	1	0	1	0	0	0	7	1	0	0	0	1	2
15	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	1
16	0	0	0	1	0	0	0	0	1	0	0	0	1	1	4	0	0	0	0	2
17	0	0	0	0	2	0	1	0	1	2	0	0	0	0	2	0	0	0	0	1
18	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	0	0	1
19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	1
20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

Table C-9. Number and Duration of Events During May - September 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Bouldin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
1	n/a	n/a	n/a	n/a	n/a	1	1	0	1	2	n/a	n/a	n/a	n/a	n/a	0	0	2	1	3
2	n/a	n/a	n/a	n/a	n/a	0	0	0	1	0	n/a	n/a	n/a	n/a	n/a	0	0	1	0	3
3	n/a	n/a	n/a	n/a	n/a	0	0	2	1	0	n/a	n/a	n/a	n/a	n/a	0	0	0	1	1
4	n/a	n/a	n/a	n/a	n/a	0	0	0	1	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	1
5	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
6	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
7	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	2
8	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
9	n/a	n/a	n/a	n/a	n/a	0	0	0	0	1	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
10	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
11	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
12	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
13	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
14	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
15	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
16	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
17	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
18	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
19	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
20	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
21	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
22	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
23	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
24	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
25	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
26	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
27	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
28	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
29	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
30	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
31	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
32	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
33	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
34	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
35	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

	River Monitor (G)					Bank Monitor (G)					River Monitor (NG)					Bank Monitor (NG)				
	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP	MAY	JUN	JUL	AUG	SEP
36	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
37	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
38	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
39	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
40	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
41	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
42	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
43	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
44	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
45	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
46	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
47	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
48	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
49	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
50	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
51	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
52	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
53	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
54	n/a	n/a	n/a	n/a	n/a	0	0	0	0	1	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
55	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
56	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
57	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
58	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
59	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
60	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
61	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
62	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
63	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
64	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
65	n/a	n/a	n/a	n/a	n/a	0	0	0	1	0	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0

Alabama Power Company
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Table C-14. Number and Duration of Events During May - November 2018 where Dissolved Oxygen was Less Than 5.0 mg/L During Generation and Non-Generation, Measured at the River and Bank Monitors in the Jordan Project Tailrace (G=Generation; NG= Non-Generation)

Duration (hrs)	River Monitor (G)							Bank Monitor (G)							River Monitor (NG)							Bank Monitor (NG)						
	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV	MAY	JUN	JUL	AUG	SEP	OCT	NOV
1	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	2	1	0	1	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	2	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	1	2	0	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	0	2	0	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

EXHIBIT 2

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

The Federal Energy Regulatory Commission (FERC) Additional Information Request is presented in italics followed by Alabama Power Company's response in normal text.

Aquatic Resources

14. *Article 417 of the now-vacated June 20 Order required Alabama Power to develop a plan for implementing the terms and conditions of the U.S. Fish and Wildlife Service's (FWS) biological opinion, including measures associated with the Logan Martin Adaptive Management Plan. By October 31, 2024, Alabama Power was required to file a final report with the Commission on all activities that had been implemented pursuant to the Logan Martin Adaptive Management Plan, including any proposals for additional enhancement measures or monitoring (e.g., water quality monitoring, fish/mussel/snail population monitoring, etc.) downstream of the Logan Martin development. To ensure that Commission staff conducts its environmental analysis using the most accurate and up-to-date information available, please file a report that describes the status and results of all activities undertaken in 2018 in regard to any monitoring or sampling efforts conducted in accordance with the Logan Martin Adaptive Management Plan. This report should also include a summary of any meetings held with the resource agencies to discuss activities related to the Logan Martin Adaptive Management Plan. Lastly, the report should describe any proposals for future studies or monitoring, as it relates to this plan.*

Alabama Power Company Response

Attached is the Logan Martin Adaptive Management Plan update, including all consultation.

Alabama Power Company
Response to FERC's January 8, 2019 Additional Information Request
Coosa, Mitchell, and Jordan Dam Hydroelectric Projects (FERC Nos. 2146-111, 82-000, and 618-000)

ATTACHMENT
LOGAN AMP UPDATE

**2018 Annual Report of Activities Conducted under the
Logan Martin Adaptive Management Plan**

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I. Introduction

On June 20, 2013, FERC issued a new license combining the Coosa Hydroelectric Project (FERC No. 2146), the Mitchell Dam Hydroelectric Project (FERC No. 82), and the Jordan Dam Hydroelectric Project (FERC No. 618). The 2013 license was vacated and remanded by the D.C. Circuit Court of Appeals on July 6, 2018, for further proceedings consistent with the Court's opinion. Until such time as FERC issues a new Coosa River Project license, each project is operating under annual licenses pursuant to Section 15(a)(1) of the Federal Power Act (83 Fed. Reg. 46937, Sept. 17, 2018). Although implementation of the Logan Martin Adaptive Management Plan is not required by the Coosa Project annual license, Alabama Power is continuing to implement the Plan on a voluntary basis as described in the response to Question 1.

Article 417 of the 2013 Coosa River Project (Project) license required Alabama Power to develop and implement a plan to minimize take of listed species consistent with the terms and conditions of the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (Coosa BO) for the Project filed with the FERC on June 10, 2012. To comply with Article 417 of the Project license, Alabama Power submitted the Coosa Threatened and Endangered Species Protection Plan (T&E Protection Plan) to FERC on October 31, 2016, and it was approved by FERC on December 19, 2016. In accordance with the T&E Protection Plan, Alabama Power filed the Logan Martin Tailrace Area Adaptive Management Plan for Threatened and Endangered Species (Logan AMP) on October 21, 2017, and FERC approved the Logan AMP on November 28, 2017.

The Logan AMP was developed, in consultation with USFWS and ADCNR, for two purposes: 1) to assess the condition of the Logan Martin tailrace following the implementation of dissolved oxygen (DO) enhancements required by the Water Quality Certification (WQC) for the Coosa Project, issued by the Alabama Department of Environmental Management (ADEM) on July 1, 2005; and 2) to further evaluate the impact of continued project operations on listed species downstream of Logan Martin dam following implementation of the DO enhancements.

The purpose of this report is to update the U.S. Fish and Wildlife Service (USFWS) and the Alabama Department of Conservation and Natural Resources (ADCNR) on the activities conducted under the Logan AMP during 2018.

II. 2018 Annual Report of Activities Conducted under the Logan Martin Adaptive Management Plan

A. 2018 Meetings Overview

On February 21, 2018, the first meeting as outlined in section 7.0 of the plan was held (meeting notes are provided in Appendix A). The purpose of this meeting was to review the details of the FERC-approved plan, review the schedule, provide an update on the status of the new aeration system, and discuss new mollusk baseline sampling.

On February 26, 2019, an annual meeting took place to review the data that was collected in 2018, which was the first year of data collection under the plan (meeting notes are provided in Appendix B). At this meeting, the first year of post-dissolved oxygen enhancement data and the new mussel baseline was reviewed.

B. Summary of Logan Martin Dissolved Oxygen Data

As outlined in the Logan AMP, Alabama Power collected water quality data below Logan Martin from May 1 – November 30, 2018 during both generation and non-generation. The water quality data was collected according to the Coosa Water Quality Monitoring Plan submitted by Alabama Power Company on July 29, 2016 and approved by FERC on December 19, 2016. Representative generation temperature and DO was collected at the location and as described in the WQC, which is located approximately one mile downstream of Logan Martin Dam on the east bank of the Coosa River. Measurements were recorded at 60-minute intervals during generation. An additional non-generation monitor recorded DO and temperature at 60-minute intervals during periods of non-generation as outlined in the Coosa Water Quality Monitoring Plan. Non-generation is defined as: 1) hours that contain no generation, 2) hours that contain both generation and non-generation (partial hours), or 3) the first full hour of generation.

In 2018, the new DO enhancements at Logan Martin (i.e., blowers and diffusers) performed well. The DO during generation was above 4.0 mg/L 99% of the time (Figure 1), and the DO during non-generation was above 4.0 mg/L approximately 68% of the time (Figure 2). The average DO was 5.82 mg/L, which was an average of 6.51 mg/L during generation and an average of 4.97 mg/L during non-generation.

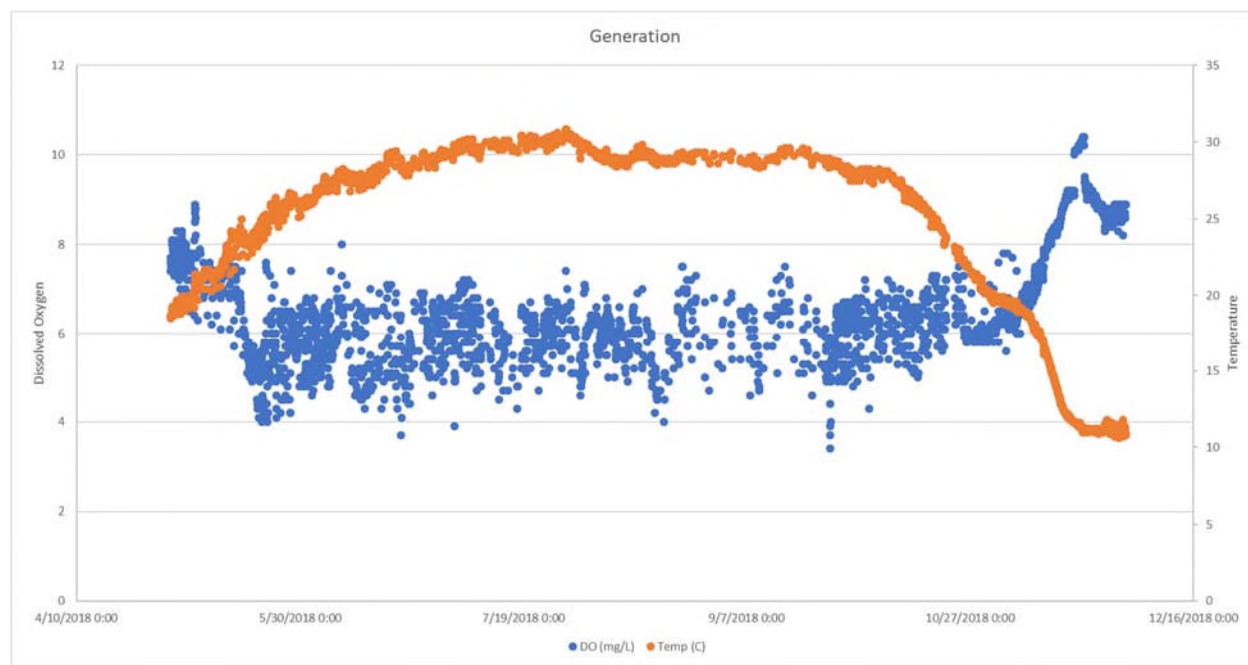


Figure 1: 2018 Logan Martin Tailrace Dissolved Oxygen and Temperature During Generation

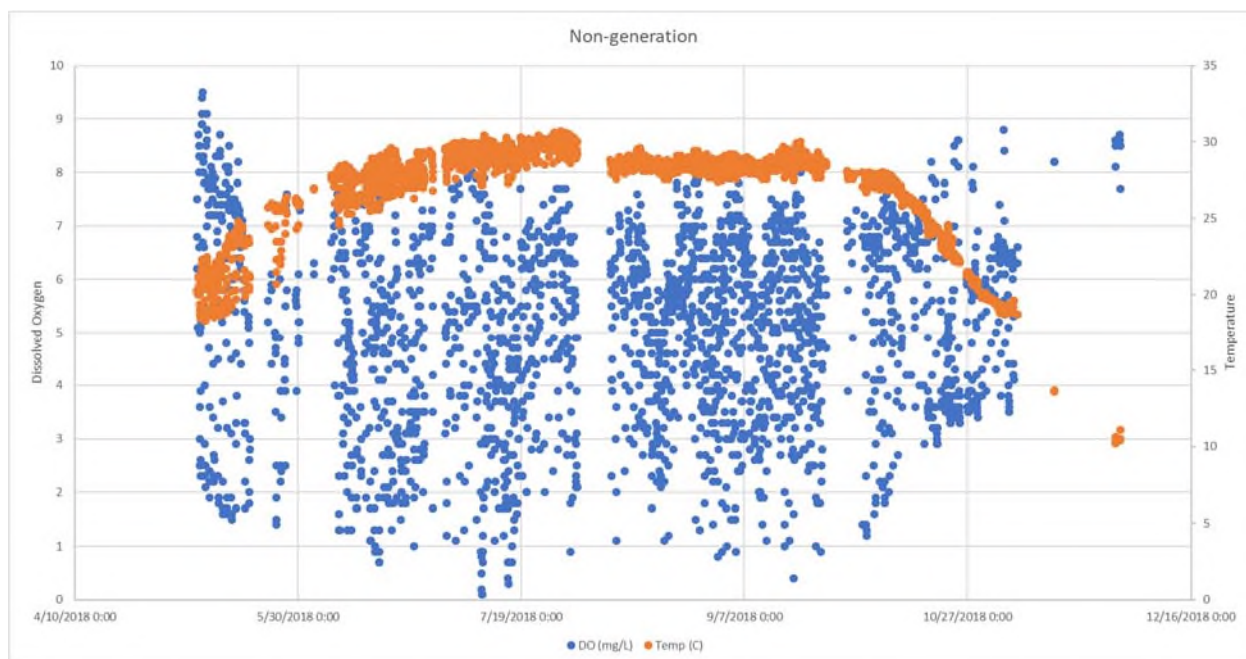


Figure 2: 2018 Logan Martin Tailrace Dissolved Oxygen and Temperature During Non-generation

In order to evaluate the new aeration systems' performance, 2018 data were compared to data collected in 2014 (July - September of each representative year). 2014 was selected for comparison because it is the only year with representative non-generation data. From 2014 to 2018, the average DO increased from 4.36 mg/L to 5.31 mg/L. The total percent of time that DO was above 4.0 mg/L increased from 57.7% to 81.6%, and the percent of time above 4.0 mg/L during generation increased from 92.4% to 99.3%. Further, the percent of time above 4.0 mg/L during non-generation increased from 50.2% to 69.1%. A complete summary of the improvements can be found in Appendix B.

During the February 26, 2019 meeting, the AMP members requested that Alabama Power plot the generation and non-generation data from July – September in 2014 and 2018 on the same plots to allow for easier comparison. These two plots are included below (Figure 3 and Figure 4) along with the requested tables of duration of events that the DO was below 4.0 mg/L during the same time period (Table 1 and Table 2). From the duration tables, improvement in the non-generation DO at the non-generation monitor is evident. In 2014, 68 events occurred between July and September when the DO was below 4.0 mg/L for 5 hours or more in comparison to 10 events during the same months in 2018.

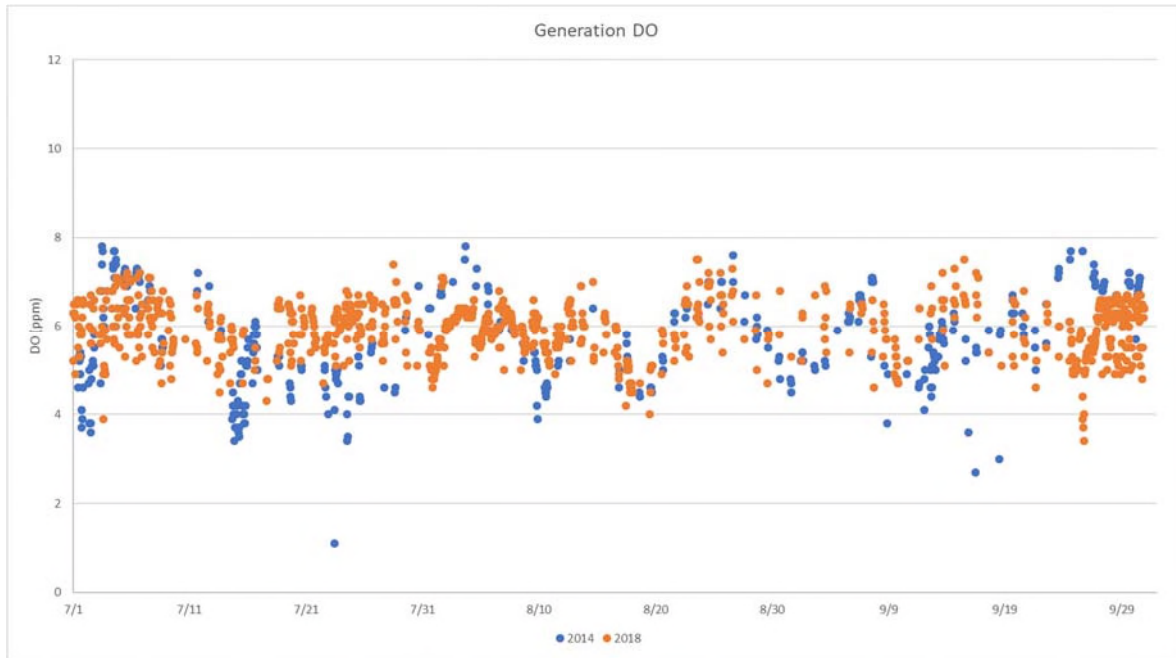


Figure 3: 2014 and 2018 Logan Martin Tailrace Dissolved Oxygen During Generation

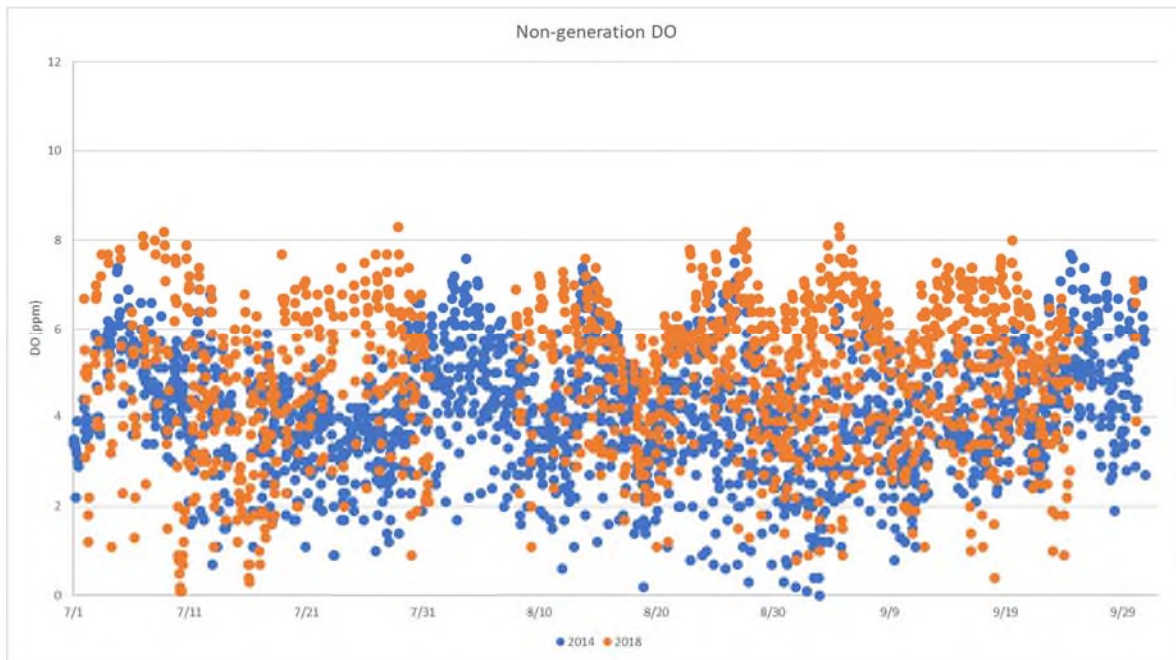


Figure 4: 2014 and 2018 Logan Martin Tailrace Dissolved Oxygen During Non-generation

Duration of Event (hrs) DO < 4 mg/L	AIR Monitor (G)			Existing Monitor (G)			AIR Monitor (NG)			Existing Monitor (NG)		
	July	August	Sept	July	August	Sept	July	August	Sept	July	August	Sept
1	2	0	4	2	1	4	25	12	15	25	34	20
2	3	0	0	4	0	0	12	14	16	18	13	14
3	0	0	0	0	0	0	9	16	5	17	14	5
4	0	0	0	2	0	0	4	5	5	0	2	2
5	0	0	0	0	0	0	2	3	0	2	2	2
6	0	0	0	0	0	0	5	7	4	5	5	2
7	0	0	0	0	0	0	0	0	1	0	3	0
8	0	0	0	0	0	0	2	1	0	2	0	2
9	0	0	0	0	0	0	1	3	2	2	1	3
10	0	0	0	0	0	0	1	2	1	1	1	1
11	0	0	0	0	0	0	3	2	2	2	2	1
12	0	0	0	0	0	0	1	0	0	0	0	2
13	0	0	0	0	0	0	1	0	1	0	1	1
14	0	0	0	0	0	0	0	1	3	0	1	2
15	0	0	0	0	0	0	3	4	1	1	1	1
16	0	0	0	0	0	0	1	0	2	2	1	0
17	0	0	0	0	0	0	2	0	2	0	0	1
18	0	0	0	0	0	0	0	2	1	0	0	2
19	0	0	0	0	0	0	0	0	0	0	0	0
20	0	0	0	0	0	0	0	1	0	0	0	0
21	0	0	0	0	0	0	0	0	0	0	1	0

Table 1: Number and Duration of Events During July - September 2014 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the Generation and Non-generation Monitors in the Logan Martin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

Note: “AIR Monitor” is the same location as the 2018 “Non-generation Monitor” and the “Existing Monitor” is the same location as the 2018 “Generation Monitor”

Duration of Event (hrs) DO < 4.0 mg/L	Non-Generation Monitor (G)			Generation Monitor (G)			Non-generation Monitor (NG)			Generation Monitor (NG)		
	JUL	AUG	SEP	JUL	AUG	SEP	JUL	AUG	SEP	JUL	AUG	SEP
1	2	2	1	4	0	0	23	20	22	14	10	15
2	1	0	0	1	0	0	12	9	13	2	9	17
3	0	0	0	0	0	1	9	8	20	6	3	8
4	0	0	0	0	0	0	4	3	5	1	1	1
5	0	0	0	0	0	0	0	2	0	0	1	1
6	0	0	0	0	0	0	1	1	0	1	1	1
7	0	0	0	0	0	0	0	0	0	1	3	0
8	0	0	0	0	0	0	2	0	0	2	1	1
9	0	0	0	0	0	0	1	0	1	0	0	0
10	0	0	0	0	0	0	1	0	0	1	0	0
11	0	0	0	0	0	0	1	0	0	0	1	0
12	0	0	0	0	0	0	0	0	0	0	0	0
13	0	0	0	0	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0	1	0	0
15	0	0	0	0	0	0	0	0	0	2	0	0
16	0	0	0	0	0	0	0	0	0	0	0	0
17	0	0	0	0	0	0	0	0	0	1	0	0
18	0	0	0	0	0	0	0	0	0	1	0	0

Table 2: Number and Duration of Events During July - September 2018 where Dissolved Oxygen was Less Than 4.0 mg/L During Generation and Non-Generation, Measured at the Generation and Non-generation Monitors in the Logan Martin Development Tailrace of the Coosa River Project (G=Generation; NG= Non-Generation)

C. Summary of New Baseline Mollusk Sampling Data

As agreed upon by ADCNR and USFWS, Alabama Power conducted new mollusk baseline sampling. The complete 2018 Mollusk Survey Report is included as Appendix C.

2018 Mollusk Sampling

On July 10, 2018, Auburn University and Alabama Power sampled the snail and mussel communities in three reaches of the Coosa River downstream of Logan Martin Dam to provide an updated baseline description of those communities, as well as to provide data that might be compared with data that had been collected previously. The three reaches sampled were the areas around Elliott Island, Buzzard Island, and Prince Island. These reaches were selected in order to compare the results to the same locations that were sampled in 2006. Sampling yielded a total of 14 mussel/clam species, 7 snail species, and 1 limpet genus. When considering the combination of all collected live, fresh dead, and relict specimens (as was done in the 2006 sampling), there were no clear or consistent trends or differences in species occurrence among sites, in sizes of live individuals among sites, or relative to presence/absence between the current collections versus the 2006 collections. Generally, these data provide a baseline data set for comparison with future sampling of this area.

D. Summary of 2018 Species Reintroductions in the Logan Martin Tailrace

No species were reintroduced into the Logan Martin Tailrace in 2018.

E. Summary of Recommendations for 2019

Based on one year of results, no recommendations to make any changes to the schedule for 2019 were made. Alabama Power will continue to operate the new aeration systems to evaluate the improvements to DO.

F. Success of the Logan Martin Adaptive Management Plan in 2018

It is too early to determine whether the goals of the Logan AMP are being met. However, based on the data and work summarized above, the Logan AMP was a success in 2018, which is evidenced by the Logan AMP meetings, calls, and emails regarding the changes in mollusk sampling schedule. Additionally, the annual meetings were well attended, and provided suggested recommendations on how to present the data included in this report.

From: Corinne O. Milinovich <com@dvclaw.com>
Sent: Wednesday, January 29, 2020 4:22 PM
To: ACT-ACR
Subject: [Non-DoD Source] Southeastern Federal Power Customers, Inc. Comments
Attachments: SeFPC Comments on Allatoona Reallocation .pdf

Dear Commander:

On behalf of Alan Williford, Chairman, Water Storage Reallocation Committee for the Southeastern Federal Power Customers, Inc., please find attached comments on 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. If you have any questions, please feel free to contact me.

Thank you,

Corinne O. Milinovich | Attorney
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Portland, OR 97201
T: 503.241.7242 | F: 503.241.8160



DAVISON VAN CLEVE

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NGO-11

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Blue Ridge Power Agency
Danville, VA 24541-3300

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Tucker, GA 30085-1349

Orangeburg Department of
Public Utilities
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Piedmont Municipal Power Agency
Greer, SC 29651-1236

PowerSouth Energy Cooperative
Andalusia, AL 36420-0550

Saluda River Electric
Cooperative, Inc.
Laurens, SC 29360-0929

Santee Cooper
Moncks Corner, SC 29461-2901

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Virginia Cooperative Preference
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and Updates to

Virginia Municipal Electric
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January 29, 2020

Via Electronic Mail

Commander
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**RE: Southeastern Federal Power Customers, Inc. Comments on the
Allatoona Lake Water Supply Storage Reallocation Study and
Updates to the Weiss and Logan Martin reservoirs Project
Water Control Manuals Draft FR/SEIS**

Dear Commander:

The Southeastern Federal Power Customers, Inc. ("SeFPC") respectfully submits the following comments on the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals, ("Draft FR/SEIS"). The SeFPC represents the interests of municipally owned utilities and rural electric cooperatives that purchase power marketed by the Southeastern Power Administration which is generated at Corps multipurpose projects in the Southeast.

SeFPC continues to participate in U.S. Army Corps of Engineers ("Corps" or "Agency") 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 public engagement processes, as exemplified by SeFPC's August 15, 2018 scoping comments, December 11, 2019 request for comment deadline extension, and member attendance at Corps Open House Public Scoping Meetings. As such, SeFPC members are extremely interested in the Draft FR/SEIS process and will be directly affected by the outcome of this process.

I. Introduction

On November 15, 2019, Corps published the Draft FR/SEIS and requested public comments be submitted by January 29, 2020.^{1/} In the Draft FR/SEIS,

^{1/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study
Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility

Corps selected Alternative 11—the Tentatively Selected Plan (“TSP”)—in order to address “both Georgia’s water supply request at Allatoona Lake and [Alabama Power Company’s] request to modify flood operations at Weiss and Logan Martin lakes with no adverse impacts to federally authorized project purposes and only minor impacts on the natural and human environment.”^{2/}

Alternative 11 results in the reallocation of 33,872 ac-ft of storage in Allatoona Dam and Lake.^{3/} Of that 33,872 ac-ft, “11,670 ac-ft is from flood storage...[and] [t]he remainder of 22,202 ac-ft is from the conservation pool.”^{4/} Alternative 11 enables withdrawals up to 94 million gallons per day (“mgd”) while also meeting Georgia’s requested need.^{5/} Specifically, Alternative 11 “enable[s] withdrawals up to 94 mgd from combination of flood storage and conservation storage, using [Corps] current storage accounting methodology, and modified flood operations at APC Weiss and Logan Martin projects.”^{6/} Notably, Alternative 3 and 10 similarly allow for withdrawals up to 94 mgd. However, Alternative 3 and 10 vary in the source of the reallocation waters, and in the storage accounting methodology applied. Alternative 3 “enables withdrawals up to 94 mgd from conservation storage only, using Georgia’s proposed storage accounting methodology.”^{7/} Whereas Alternative 10 “enable[s] withdrawals up to 94 mgd from conservation storage only, using [Corps] current storage accounting methodology, and modified flood operations at APC Weiss and Logan Martin projects.”^{8/}

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. 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/}

A**B**

Report and Integrated Supplemental Environmental Impact Statement (Nov. 15, 2019); <https://www.sam.usace.army.mil/Media/News-Releases/Article/2043441/usace-mobile-district-extends-comment-period-for-allatoona-lake-draft-frseis-we/> (last accessed Jan. 3, 2020).

^{2/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement, Cover Sheet at 27:31 (Nov. 15, 2019).

^{3/} Id. at 7-1:6.

^{4/} Id. at 7-1:6-7.

^{5/} Id. at 7-1:8.

^{6/} Id. at 5-10: 10.

^{7/} Id.

^{8/} Id.

^{9/} Congress enacted NEPA on January 1, 1970 in response to “the profound impact of man’s activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man.” Congress ordered federal, state, local, and public and private organizations to “use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony,

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.

C

II. The Corps failed to identify legal authority in support of the Draft FR/SEIS

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.

D

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 be...arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law."^{12/}

and fulfill the social, economic, and other requirements of present and future generations of Americans." 42 USCS § 4331.

^{10/} The history of exceeding current contract limits at Lake Allatoona also suggests that allocating as much storage as necessary and consistent with the law to support withdrawals without resorting to an unprecedented accounting methodology provides the appropriate long-term remedy to a problem that has persisted for decades.

^{11/} Pursuant to 5 USCS § 553, a federal agency must engage in a notice and comment period when engaging in rule making. Accordingly, "rule making" is defined as "agency process for formulating, amending, or repealing a rule," and "rule" is defined as "the whole or a part of an agency statement of general or particular applicability and future effect designed to implement, interpret, or prescribe law or policy or describing the organization, procedure, or practice requirements of an agency." 5 USCS § 551(4)-(5). As such, Corps does not engage in notice and comment when drafting Engineer Regulations and thus, they are by definition not rules or binding legal authority but do reflect statutory authority.

^{12/} 5 U.S.C. § 706(2)(A); *Quachita Watch League v. Jacobs*, 463 F.3d 1163, 1169, 2006 U.S. App. LEXIS 22565, *9, 36 ELR 20187, 19 Fla. L. Weekly Fed. C 1042 (We review an agency's decisions pursuant to NEPA under the arbitrary and capricious standard of the Administrative Procedure Act (APA). 5 U.S.C. § 706(2)(A) (2006) citing *City of Oxford v. FAA*, 428 F.3d 1346, 1351 (11th Cir. 2005).

III. The Corps Evaluated an Improper Baseline to Support a Reallocation Pursuant to the Water Supply Act of 1958

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/}

E

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.

F

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.

G

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.

H

^{13/} Congressional Research Service, Using Army Corps of Engineers Reservoirs for Municipal and Industrial Water Supply Current Issues (Jan. 4, 2010) citing 1958 WSA; P.L. 85-500.

^{14/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement, at 4-4:1-2 (Nov. 15, 2019).

^{15/} U.S. Army Corps of Engineers, Appendix A, at A-2:35-43 (Nov. 15, 2019); U.S. Army Corps of Engineers, Appendix E, at E-1:4-5 (Nov. 15, 2019).

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.

I

IV. Adopting the State of Georgia's Storage Accounting Methodology would require Corps to issue a Supplemental Environmental Impact Statement

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/}

J

Although Corps may argue that a supplemental environmental impact statement is not needed here,^{17/} the second prong of 40 CFR 1502.9(c)(1) reiterates the need for a supplemental impact statement in the current instance given the simple fact that adopting the state of Georgia's proposed storage accounting methodology would undoubtedly create significant new circumstances relevant to environmental concerns, the proposed actions, and its impacts. Furthermore, SeFPC's assertion is supported by the Supreme Court:

^{16/} Defenders of Wildlife v. Salazar, 877 F. Supp. 2d 1271, 1296, 2012 U.S. Dist. LEXIS 94946, *61-63, 2012 WL 2812309 citing In re Operation of Mo. River Sys. Litig., 516 F.3d 688, 693 (8th Cir. 2008); Ark. Wildlife Fed'n v. U.S. Army Corps of Eng'rs, 431 F.3d 1096, 1102 (8th Cir. 2005).

^{17/} "[A]n agency's decision to select a previously rejected alternative is not a substantial change requiring an SEIS if "the relevant environmental impacts have already been considered." Friends of Marolt Park v. United States DOT, 382 F.3d 1088, 1097 (10th Cir. 2004); see Arkansas Wildlife, 431 F.3d at 1102 (SEIS required only if "the changed plans or circumstances will affect the quality of the human environment in a significant manner . . . not already considered by the federal agency"); Marsh, 490 U.S. at 374 (same, applying 40 C.F.R. § 1502.9(c)(1)(ii))." Missouri v. United States Army Corps of Eng'rs (In re Operation of the Mo. River Sys. Litig.), 516 F.3d 688, 694, 2008 U.S. App. LEXIS 2802, *13, 38 ELR 20047.

NEPA ...require[s] that agencies take a "hard look" at the environmental effects of their planned action, even after a proposal has received initial approval...Application of the "rule of reason" thus turns on the value of the new information to the still pending decision making process. In this respect the decision whether to prepare a supplemental EIS is similar to the decision whether to prepare an EIS in the first instance: If there remains "major Federal action" to occur, and if the new information is sufficient to show that the remaining action will "affect" the quality of the human environment" in a significant manner or to a significant extent not already considered, a supplemental EIS must be prepared.^{18/}

According to CEQ regulations, "major Federal action" includes "actions with effects that may be major, and which are potentially subject to Federal control and responsibility. Major action reinforces but does not have a meaning independent of significantly."^{19/} Notably, major Federal action includes inaction by responsible officials.^{20/} Additionally, major Federal action also includes "new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by federal agencies; new or revised agency rules, regulations, plans, policies, or procedures; and legislative proposals."^{21/}

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.

V. The Corps Must Issue a Supplemental Environmental Impact Statement Considering the Information Disclosed in Civil Action No. 1:17-cv-00400-RWS

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 decision...no action concerning the proposal shall be taken which would...[h]ave an adverse environmental impact...[or] [l]imit the choice of

K

^{18/} Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 374, 109 S. Ct. 1851, 1859, 104 L. Ed. 2d 377, 392-393, 1989 U.S. LEXIS 2150, *25, 57 U.S.L.W. 4504, 19 ELR 20749, 29 ERC (BNA) 1508 citing Cf. 42 U. S. C. § 4332(2)(C).

^{19/} 40 CFR 1508.18 (internal citations omitted).

^{20/} Id.

^{21/} 40 CFR 1508.18(a) (internal citations omitted).

reasonable alternatives.”^{22/} Here, Corps is clearly taking action concerning the Draft FR/SEIS 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.

On February 1, 2017, Cobb County-Marietta Water Authority (“Cobb-Marietta”) filed a lawsuit against Corps challenging the “‘storage accounting’ system adopted by the [Corps] to determine how much water is held in storage in Allatoona Lake for different users and uses.”^{24/} Cobb-Marietta alleges that “the storage accounting adopted by the Corps deprives Cobb-Marietta of water to which it is entitled.”^{25/} Notably, “Corps denies this allegation.”^{26/} The case was stayed in order for Corps to reconsider “the Adopted Storage Accounting and the Alternative Storage Accounting proposed by Cobb-Marietta.”^{27/} Further, “[t]he Stay Agreement provided for the Corps to issue a Legal Analysis within 120 days to answer specific questions and establish the legal context for its reconsideration of the Adopted Storage Accounting.”^{28/} The Corps found in the Legal Analysis that “no law or regulation, other than the terms of the 1963 Contract itself, precludes considering or adopting the Alternative Storage Accounting at Allatoona Lake, after appropriate review.”^{29/} As such, Cobb-Marietta continued the stay.^{30/}

However, according to Cobb-Marietta and Corps’ November 26, 2019 joint motion to stay:

Cobb-Marietta...identified what appears to be a contradiction between the Draft EIS and the Legal Analysis, and the Corps has acknowledged Cobb-Marietta’s concern. The Parties are currently engaged in discussions and are optimistic that a resolution can be achieved within a few weeks.^{31/}

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

^{22/} 40 CFR 1506.1(a)(1)-(2).

^{23/} Ctr. for Biological Diversity, Manasota-88, Inc. v. United States Army Corps of Eng’rs, 2019 U.S. App.= LEXIS 32915, *37, 941 F.3d 1288, 28 Fla. L. Weekly Fed. C 556.

^{24/} Civil Action No. 1:17-cv-00400-RWS, Cobb County-Marietta Water Authority v. U.S. Army Corps of Engineers, et al., Joint Motion to Continue Stay Until January 3, 2020, at 1:1 (Nov. 26, 2019).

^{25/} Id. at 1-2:1.

^{26/} Id. at 2:1.

^{27/} Id. at 2:2.

^{28/} Id. at 2:3.

^{29/} Id. at 2-3:4 citing Memorandum for Record, Re: Legal Analysis of Adopted and Alternative Storage Accounting, Cobb County-Marietta Water Authority v. U.S. Army Corps of Engineers, No. 1:17-cv-400 (N.D. Ga. Filed Feb. 1, 2017) at 1.

^{30/} Civil Action No. 1:17-cv-00400-RWS, Cobb County-Marietta Water Authority v. U.S. Army Corps of Engineers, et al., Joint Motion to Continue Stay Until January 3, 2020, at 3:5 (Nov. 26, 2019).

^{31/} Id. at 3:7.

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.

VI. Alternative 11 Requires an Update to the Allatoona and ACT Water Control Manuals

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.

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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]

^{32/} U.S. Army Corps of Engineers, ACT Master Water Control Manual, <https://www.sam.usace.army.mil/Missions/Planning-Environmental/ACT-Master-Water-Control-Manual-Update/> (last accessed Jan. 3, 2020).

^{33/} Id.

^{34/} Id. The SeFPC does note, however, that the record demonstrates that the Corps has not fully adhered to all authorized project purposes in the operation of the project in recent years. By example, the Corps has admitted that the water supply operations have exceeded the contract limitations, expanding the boundaries of the authorized use.

^{35/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement, at 16:17 (Nov. 15, 2019); <https://www.sam.usace.army.mil/Missions/Planning-Environmental/ACT-Master-Water-Control-Manual-Update/> (last accessed Jan. 3, 2020).

^{36/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement, at 2-4:16:17. (Nov. 15, 2019).

^{37/} Id. at 2-6:3-5.

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 823 ft to 824.5 ft.”^{40/} Therefore, because “the pool level in Allatoona Lake [will] be maintained at a slightly higher level throughout the year compared to current operations,”^{41/} the Allatoona Water Control Manual must be updated.

If the Corps decides to raise the flood pool to accommodate the water supply request, the Corps needs to provide a notice and comment period to provide the appropriate due process for changing the pool elevation because the effects of raising the flood pool were not addressed or modeled in the most recent iteration of the Allatoona and ACT Water Control Manuals. Indeed, the Corps must provide the public with the opportunity to assess the effects of raising the flood pool, failure to do so is arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.^{42/}

VII. Request for Further Information Regarding Critical Yield calculation

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/}

M

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 Corps’ Method A.^{44/} Therefore, although Corps is using the same 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.

VIII. Request for Further Information Regarding the Allatoona Dependable Capacity Benefits Calculation

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

N

^{38/} Id. at 5-15:17-17.

^{39/} Id. at 5-15:17-18.

^{40/} Id. at 18-19.

^{41/} Id. at 20-21.

^{42/} 5 U.S.C. § 706(2)(A).

^{43/} U.S. Army Corps of Engineers, Appendix C Modeling and Engineering, Attachments 1-8, attachment 9-11, at 9 (Nov. 15, 2019).

^{44/} U.S. Army Corps of Engineers, Appendix B: ACT Basin PDF, at B-38 (Feb. 2010).

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.

IX. Conclusion

Corps' failure to identify the applicable legal authority in support of the Agency's proposal to reallocate flood storage at Allatoona Lake to water supply storage and improper baseline analysis are violations of NEPA. Further, Corps must issue a supplemental EIS considering Civil Action No. 1:17-cv-00400-RWS in order to comply with NEPA. Similarly, if Corps selects Alternative 11 in the Final EIS and ROD, a supplemental EIS will be mandatory.

The SeFPC appreciates the opportunity to provide Corps with comments on the Draft FR/SEIS. Please feel free to contact me with any questions.

Respectfully submitted,

/s/ Alan Williford

Chairman

Water Storage Reallocation Committee

Southeastern Federal Power Customers, Inc.

wsrc@sefpc.org

^{45/} U.S. Army Corps of Engineers, Final Environmental Impact Statement Update to the Water Control manual for the Alabama-Coosa-Tallapoosa River Basin in Georgia and Alabama Volume 1, at 6-199 (Oct. 2014).

^{46/} U.S. Army Corps of Engineers, Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals Draft Feasibility Report and Integrated Supplementation Environmental Impact Statement Appendix D. Economics, at 39-41 (June 17, 2019).

From: Kelly <[REDACTED]>
Sent: Wednesday, January 29, 2020 3:39 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comments Re Allatoona Draft FR/SEIS
Attachments: Comments-Allatoona Draft FR-SEIS PG 1 of 2.pdf; Comments-Allatoona Draft FR-SEIS PG 2 of 2.pdf

Please find attached above my comments regarding the Allatoona Draft FR/SEIS. If you have questions or require additional information, please feel free to contact me.

Best regards,

Kelly Stephens

Board Member – Neely Henry Lake Association

Phone: [REDACTED]

Email: [REDACTED]



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comments Should Be Submitted by January 29, 2020

Information About You

First Name: KELLY Last Name: STEPHENS
Title: BOARD MEMBER - NEELY HENRY LAKE ASSOCIATION

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☒ Phone: [REDACTED] ☐ Email: _____
☐ Mailing
Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input checked="" type="checkbox"/> Threatened and Endangered Species	<input checked="" type="checkbox"/> Navigation	<input checked="" type="checkbox"/> Economic Resources
<input checked="" type="checkbox"/> Fisheries	<input checked="" type="checkbox"/> Environmental Resources	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	Boating Safety

Geographic Area of Interest

<input checked="" type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment	
<p>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.</p>	A
<p>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.</p>	B
<p>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.</p>	C

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

From: Steve Forehand <SFOREHAND@russellllands.com>
Sent: Friday, January 31, 2020 4:04 PM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona DEIS Comments
Attachments: COE LMRA Comments on DEIS Allatoona Jan3120.pdf

Please accept comments on the Draft EIS for Allatoona filed on behalf of Lake Martin Resource Association, Inc.

Steve R. Forehand

ATTORNEY PRIVILEGED AND CONFIDENTIAL

The information contained in this message is privileged and confidential and is intended solely for the use of the individual(s) and/or entity(ies) named above. If you are not the intended recipient, you are hereby notified that any unauthorized disclosure, copying, distribution or taking of any action in reliance on the contents of the materials is strictly prohibited and review by an individual other than the intended recipient shall not constitute waiver of the attorney client privilege. If you have received this message in error, please notify the sender by reply message and delete this message from your system.



January 31, 2020

VIA EMAIL

ACT-ACR@usace.army.mil

Colonel Sebastien Joly, Commander, USACE Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
P.O. Box 2288
Mobile, Alabama 36628

Re: Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement—Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Control Manuals

Dear Colonel Joly:

I respectfully submit these comments on behalf of the Lake Martin Resource Association, Inc. ("LMRA"). LMRA is a non-profit corporation currently comprised of 1,200 members. The Certificate of Incorporation of LMRA (formerly known as the Lake Martin Recreation Association, Inc.) states that its purpose is:

"To improve and increase the quality and quantity of recreational opportunities on the water and the land adjacent to the water that makes up the reservoir known as Lake Martin, the same being situated in East Alabama and in the Counties of Tallapoosa, Elmore and Coosa. It shall further be the purpose of this corporation to foster stable water conditions; improve the fish and stock of fish; organize and engage in recreational activities for people of all ages; improve markings and directions for people who use the waterway; to aid and develop the stopping of pollution of said water; to work with all appropriate federal, state, and local agencies to make this Lake a safe place for fishermen, skiers, boaters, and all other persons who want and wish to use this water and its adjacent areas for the purpose of recreation and sport."

LMRA was incorporated in 1970 and intervened in the re-licensing proceedings involving Alabama Power Company ("APCO") and the Federal Power Commission (now known as the Federal Energy Regulatory Commission or "FERC") on behalf of recreational users and property owners on Lake Martin. During the course of the re-licensing proceedings, LMRA played a central role in brokering compromise agreements among APCO, itself and other interveners to preserve the recreational uses of Lake Martin.

After reviewing the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (the "Draft EIS") referenced above, LMRA offers the following comments:

-
- 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.
-

A

- 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.
-

B

- 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.
-

C

LMRA appreciates the opportunity to comment of the Draft EIS and encourages the Corps to revise the EIS to include studies of the impact of Allatoona changes on Lake Martin and the Tallapoosa River system. We also encourage the Corps to require increased returns of treated wastewater to the Coosa system from Atlanta.

Thank you for your consideration.



Steve R. Forehand
Legal Officer

B-01

From: Graham, Stacey A. <SGRAHAM@SOUTHERNCO.COM>
Sent: Friday, November 15, 2019 1:27 PM
To: ACT-ACR
Subject: [Non-DoD Source] ACR models

I am requesting the HEC-ResSim and HEC-5Q models that were developed for the ACT ACR evaluation.

A

Thanks,

Stacey Graham
Reservoir Management
Southern Company Services
205-257-6736
sgraham@southernco.com

From: Rivera, Megan <MRivera@hazenandsawyer.com>
Sent: Sunday, November 17, 2019 1:45 PM
To: ACT-ACR
Cc: Fortuna, John
Subject: [Non-DoD Source] Request for ResSim models and documentation

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.

A

Thanks very much,
Megan

Megan Wiley Rivera, PhD

**Senior Associate | Hazen and Sawyer
HydroLogics Team**

One South Street, Suite 1150, Baltimore, MD 21202
443 948-7017 (direct) | 410 539-7681 (main)
mrivera@hazenandsawyer.com | hazenandsawyer.com hydrologics.net

From: Peeples, Alan L. <ALPEEPLE@southernco.com>
Sent: Monday, December 02, 2019 4:32 PM
To: ACT-ACR
Subject: [Non-DoD Source] Alabama Power Support for 60 Day Extension of Time to File Comments
Attachments: APC Support of Alabama Request for Extension Draft FR SEIS.pdf

Please find attached Alabama Power's letter supporting the State of Alabama's request for a 60 Day extension of time to file comments on the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals.

Thank you for your consideration.

Alan Peeples
Manager – Reservoir Management

A

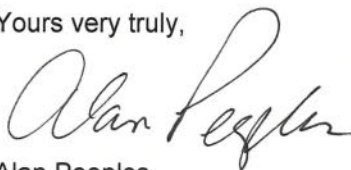
December 2, 2019

Colonel Sebastien Joly
Commander
U.S. Army Corps of Engineers, Mobile District
Attn: PD-EI (ACT-ACR DESIS)
P.O. Box 2288
Mobile, AL 36628
ACT-ACR@usace.army.mil

Dear Colonel Joly:

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.

Yours very truly,



Alan Peeples
Manager – Reservoir Management

B-04

From: Mark Crisp <mark.crisp@globalewc.com>
Sent: Monday, December 09, 2019 2:52 PM
To: ACT-ACR
Subject: [Non-DoD Source] ACR HEC-HEC RESSim Model

Please send a copy of the model to the following address.

A

Regards,

Mark W. Crisp, PE
Managing Consultant
Global Energy & Water Consulting, LLC
404.395-1255 Phone
Mark.crisp@globalewc.com

Skype
Mark.w.crisp



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12/10/2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Neil Compton

Last Name: Compton

Title: Sr. Vice President

Organization

☐ Agency

☐ Congressional

☒ Company

☐ General Public

(federal, state, or
local)

Organization: Furners & Merchants Bank

Preferred Method of Communication

☐ Phone: _____

☒ Email: [REDACTED]

☐ Mailing

Address: _____

Comment Categories

☒ Water Supply

☐ Flood Storage

☐ Water Management

☐ Cultural Resources

☐ Hydropower

☒ Lake Levels

☐ Threatened and
Endangered Species

☐ Navigation

☐ Economic Resources

☐ Fisheries

☐ Environmental
Resources

☐ Other

☐ Water Quality

☒ Recreation

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin

☐ Coosa Drainage Area

☐ Etowah Drainage Area

☐ Tallapoosa Drainage Area

☐ Oostanaula Drainage Area

☐ Alabama River

☐ Mobile Bay

☐ Other



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ALLATOONA LAKE WATER SUPPLY STORAGE
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MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

1. Concerned with Winter Water Level on Lake Weiss. I understand the Corps is considering only a 3 foot drop during Winter pool instead of current 6 foot drop. This will be a positive economic ~~activity~~ ^{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 feet for Weiss Lake during the Winter.

A

2. Also understand the the Corps is considering dropping the Flood Level from 574 to 572. This is also a positive impact for Weiss Lake I am for this proposal as well!

B

From: Ana Juan <ana@bucksisland.com>
Sent: Monday, January 27, 2020 2:10 PM
To: ACT-ACR
Subject: [Non-DoD Source] Proposed Lake Changes
Attachments: Comment Form.pdf

Hello,

Please see the attached comment form/proposed lake changes. If you have any questions contact Mr. Tony Lumpkin.

Thanks,

Ana Juan

Accounting/Finance
MarineONE Corporation
dba Buck's Island
dba RescueONE Connector Boats
P. 256-442-2588 ext.113
F. 256-442-0219
4500 Highway 77
Southside, AL 35907



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comments Should Be Submitted by January 29, 2020

Information About You

First Name: TONY Last Name: LUMPKIN
Title: PRESIDENT

Organization

☐ Agency ☐ Congressional ☒ Company ☐ General Public
(federal, state, or local)

Organization: BUCK'S ISLAND and MarineONE Corp.

Preferred Method of Communication

☐ Phone: 256-504-7898 ☒ Email: tony@bucksisland.com
☐ Mailing Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input checked="" type="checkbox"/> Threatened and Endangered Species	<input checked="" type="checkbox"/> Navigation	<input checked="" type="checkbox"/> Economic Resources
<input checked="" type="checkbox"/> Fisheries	<input checked="" type="checkbox"/> Environmental Resources	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	Boating Safety

Geographic Area of Interest

<input checked="" type="checkbox"/> Alabama-Coosa-Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

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.

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.

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.

*I support the positions stated
above AND have additional
Comments on the attached*

☒ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Tony Lumpkin

From: tony@rescueoneboats.us
Sent: Monday, January 27, 2020 12:53 PM
To: 'Tony Lumpkin'
Subject: Proposed Lake Changes

To Whom It May Concern:

This is a comment on the proposed changes by US Army Corp of Engineers as described in the attached.

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.**

B

A recently-completed study citing the **\$570 million** annual positive economic impact of the Neely Henry Reservoir included **\$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!

Respectfully,

**Tony Lumpkin, President
Buck' Island
MarineONE Corporation
4500 Highway 77
Southside, AL**

From: Benschoter, Amy E. <abenschoter@balch.com>
Sent: Wednesday, January 29, 2020 4:28 PM
To: ACT-ACR
Subject: [Non-DoD Source] Alabama Power's Comments on Draft FR/SEIS
Attachments: 2020.01.29 - Alabama Power's Comments on Corps' Draft FR-SEIS.pdf

On behalf of Alabama Power Company, please find attached comments on the Draft FR/SEIS. Should you need any additional information, please feel free to contact us.

Thanks,
Amy Benschoter



Amy E. Benschoter, Paralegal, Balch & Bingham LLP
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January 29, 2020

VIA EMAIL: ACT-ACR@usace.army.mil

Colonel Sebastien Joly, Commander, USACE Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
P.O. Box 2288
Mobile, Alabama 36628

Re: Alabama Power Company's Comments on the U.S. Army Corps of Engineers' November 15, 2019 Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona-Coosa Reallocation Study in the Alabama Coosa-Tallapoosa River Basin

Dear Colonel Joly:

The U.S. Army Corps of Engineers ("Corps") has requested comment on the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Water Control Manuals in the Alabama-Coosa-Tallapoosa ("ACT") River Basin ("Draft FR/SEIS"). Alabama Power Company ("Alabama Power") is pleased to provide the Corps with the following comments.

The Corps proposes to take action on two separate requests: (1) a pending request from the State of Georgia for the Corps to reallocate reservoir storage in Allatoona to water supply in order to meet future water supply demands in the Atlanta region; and (2) a pending request from Alabama Power to modify guide curves and flood risk management procedures in the Water Control Manuals for Alabama Power's Weiss and Logan Martin Dams.

Specifically, Georgia submitted a request to the Corps on March 30, 2018, asking the Corps to reallocate additional reservoir storage above the current water supply storage agreement for Allatoona to meet a total projected daily water supply demand of 94 million gallons per day (mgd) through the year 2050. This would require an additional 33,872 acre-feet (ac-ft) of storage to meet the demand, for a total water supply allocation at Allatoona to 52,411 ac-ft.

For its part, Alabama Power has requested that the Corps approve changes to the maximum surcharge elevations at Weiss and Logan Martin and revised flood risk management operational plans, and to approve new guide curves at Weiss and Logan Martin. For Weiss, Alabama Power has proposed lowering the maximum surcharge elevation from 574 ft. to 572 ft. and raising the winter drawdown elevation from 558 ft. to 561 ft. For Logan Martin, Alabama Power has proposed lowering the maximum surcharge elevation from 477 ft. to 473.5 ft. and raising the winter drawdown elevation from 460 ft. to 462 ft. These proposals have been the subject of extensive

study and evaluation by Alabama Power and the Corps going back to the early 2000s, and were analyzed by the Federal Energy Regulatory Commission (“FERC”) in the context of the relicensing of the Coosa River Project (FERC Project No. 2146).

The Draft FR/SEIS purports to analyze a variety of different alternatives concerning both of these requests, ultimately arriving at a Tentatively Selected Plan (“TSP”) proposing to approve both. The TSP would reallocate 33,872 ac-ft. of storage at Allatoona Lake, 11,670 ac-ft. from flood storage, and 22,202 ac-ft. from conservation storage. This would meet Georgia’s full 2050 water-supply request, reallocating 18.6% of conservation storage. The flood pool reallocation would require a 1-foot increase in Allatoona Lake’s summer guide curve elevation from 840 ft. to 841 ft. and a 1.5-ft. increase in the winter curve elevation from 823 ft. to 824.5 ft. While the Corps considers alternate accounting methods for water supply, the TSP would continue to use the Corps’ long-standing accounting methodology. The TSP would also adopt Alabama Power’s requested changes at Weiss and Logan Martin, subject to additional study prior to final agency action.

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 (“MFO1”) 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.

Alabama Power has provided the Corps with all requested information needed to evaluate Alabama Power’s proposed changes at both Weiss and Logan Martin. Alabama Power has also obtained all property interests required under its FERC license necessary to operate in accordance with the TSP. Nevertheless, Alabama Power stands ready to provide the Corps with whatever additional information is reasonably requested, including real estate documentation, and to assist the Corps in evaluating the information provided.

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.

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 MFO1 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.

C

I. Alabama Power's Interests in the ACT Basin

Alabama Power is an electric utility incorporated under the laws of the State of Alabama. Alabama Power serves approximately 1.4 million homes, businesses, and industries in the southern two-thirds of Alabama. Alabama Power owns and operates seven hydroelectric developments within the Coosa Basin downstream of the Corps' Allatoona Reservoir—Weiss, Henry, Logan Martin, Lay, Mitchell, Jordan, and Bouldin Dams. Each of these hydroelectric developments is licensed by FERC for multiple project purposes, including power production. Alabama Power operates these Coosa Basin projects in compliance with its federal licenses and, with respect to the Weiss, Henry, and Logan Martin projects, in accordance with Corps water control plans for flood risk management and navigation support. Alabama Power also owns and operates four FERC-licensed hydroelectric projects on the Tallapoosa River—Harris, Martin, Yates, and Thurlow. Alabama Power—with the help of numerous partners—is able to provide more than 45 public recreation sites on the 11 reservoirs it manages on the Coosa and Tallapoosa Rivers. These sites include five day-use facilities, dozens of boat ramps, and handicap-accessible hunting and fishing opportunities that provide open access to the State's abundant natural resources.

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.

D

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

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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.

II. Weiss and Logan Martin Background

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.

F

A. Project Authorization

The 1954 Federal Coosa River statute (Public Law 83-436), section 2, suspended the federal authorization "for the development of electric power ... to permit the development of the Coosa River, Alabama and Georgia, by a series of dams in accordance with the conditions of a license, if issued, pursuant to the Federal Power Act and in accordance with the provision and requirements of this Act." Section 3 of the Act recognized the licensing authority of the Federal Power Commission ("FPC"), now known as FERC, under the Federal Power Act. Section 5 of the Act provided that the license to be issued by the FPC would include certain minimum flood control requirements, as follows:

The license relating to such development shall require the maximum flood control storage which is economically feasible with respect to past floods of record but in no event shall such flood control storage be less than that required to compensate for the effects of valley storage displaced by the proposed reservoirs of the licensee; or less in quantity and effectiveness than the amount of flood control storage which could feasibly be provided by the currently authorized Federal multiple purpose project at Howell Mill Shoals constructed to elevation 490 with surcharge storage to elevation 495.

The Act further specified the role of the Corps in connection with the licensing of the project by the FPC. Section 7 provided that the Corps would "review any plan of development submitted to the Federal Power Commission" and "make recommendations ... to such Commission with particular regard to flood control and navigation" And, section 9 provided that "[t]he operation and maintenance of the dams shall be subject to reasonable rules and regulations of the Secretary of the Army in the interest of flood control and navigation."

Alabama Power filed its license application for the Coosa project in 1955. FPC issued the license on September 4, 1957 (Project No. 2146), following review and comment by the Corps, and included, among others, findings that "[t]he applicant's proposed plan is in accord with the provisions of Sections 4 and 5 of Public Law 436 relating to navigation and flood control and Applicant has otherwise complied with the provisions of that law insofar as necessary to effect the purposes of a license for the project."

With respect to the Logan Martin project, the license was amended twice prior to construction, principally (1) to approve the final location of the dam upstream from the originally proposed location (April 21, 1960 FPC order), and (2) to approve raising "the normal operating water surface of Logan Martin Reservoir from elevation 460 to 465 feet" (June 15, 1962 FPC

order). The 1962 order, like the 1957 license, noted that the Corps “reported that the raising of the Logan Martin reservoir is satisfactory insofar as the interests of navigation and flood control are concerned”

B. Project Operation for Flood Control

Weiss was placed in service in 1961, followed by Logan Martin in 1964. The Memorandum of Understanding (“MOU”) between the Corps and Alabama Power concerning flood control operations at Weiss was executed in 1965, and a similar MOU for Logan Martin was executed in 1967, as appendices to the Corps reservoir regulation manuals for those projects. The maximum surcharge elevations established by the 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.

Significantly, both MOUs recognized the limited flood control capability of these projects and the importance of deviations from the induced surcharge schedule for “major flood events,” as provided in section 5.6 of the Weiss MOU and section 5.5 of the Logan Martin MOU, as follows:

5.6 Reservoir operation for major floods. Normally all flood control operation will be in accordance with the regulation plan described above. However, since the limited amount of storage allocated to flood control will generally not effect any appreciable reduction in major flood peaks, it is important that special consideration be given to operation of the reservoir during a major flood. When firm forecasts indicate a major flood is in progress the Company and the District Engineer will collaborate in the prompt analysis of all available information and in determining whether a deviation from the induced surcharge schedule will improve the flood control operation. Any departure from the regulation schedule will require approval by the District Engineer. Details of the forecasting procedures, which will be developed by the Company with the concurrence of the District Engineer and which will be revised from time to time as experience dictates, will be contained in the regulation manual.

In April 1977, heavy rains caused widespread flooding in the Coosa basin, which resulted in numerous complaints centered on allegations that Logan Martin flooded more than the upstream Neely Henry project or the downstream Lay project. During that event the elevation of Logan Martin reached 475.3 ft.—about two feet above the 473.5 ft. flowage easement. This event resulted in a meeting among representatives of the Corps, FERC, and Alabama Power to review operations and explore possibilities for minimizing future flood damages. While the Corps concluded that the reservoirs were operated in general conformance of the approved procedures during the April 1977 event, a more flexible flood control procedure was recommended, pending a future comprehensive flood control study when sufficient funds and manpower were available.

During a high flow event in April 1979, Alabama Power requested and the Corps approved a variance from the Logan Martin MOU flood control plan to increase outflow, which resulted in a peak elevation of 474.04 ft. at Logan Martin. Downstream landowners on the Mitchell reservoir

filed a damage suit against Alabama Power, claiming that Alabama Power negligently failed “to exercise its power of eminent domain to purchase or condemn a sufficient easement” for hydroelectric purposes. *See Ellis v. Alabama Power Co.*, 431 So. 2d 1242 (Ala. 1983). The Court found that the flooding of the plaintiffs’ property was not caused by water being backed up by the downstream Mitchell Dam, but instead by water being released from the upstream Lay Dam, in compliance with the Corps’ flood control plan, and for that reason, among others, Alabama Power was not liable to the plaintiffs. *Id.* at 1245. The Court relied in part on the testimony of John S. Drago, an official in the Corps’ Mobile District, who testified that “the amount of easement acquired and the operation of a dam for flood control purposes are not related.” *Id.* at 1246.

Since then, Alabama Power has requested and the Corps has granted variances to flood control operations, consistent with the above quoted provisions of the MOUs, to improve use of the storage within the easement during high flow events. These variances generally allowed the release of more water earlier during a flood event at Logan Martin. While flooding has not exceeded the easement elevation at Weiss, variances have been obtained for Weiss also. These variances have allowed Alabama Power and the Corps both to improve downstream flood control and to avoid upstream flooding by backing water above the flowage easements elevations.

C. Studies of the Weiss and Logan Martin Proposals

In 2001 and following, Alabama Power began work on the proposed FERC relicensing of the Coosa Project, including the modified flood operations procedures and revised guide curves for Weiss and Logan Martin, working closely with the Corps to design and implement the necessary studies, all as outlined in the Approved Plan of Study (Appendix C, Attachment 7, Draft FR/SEIS). FERC’s order issuing a new license to Alabama Power for the Coosa Project, issued in 2013, conditionally approved the modified flood operations procedures and revised guide curves for Weiss and Logan Martin, pursuant to Pub. L. 83-436, subject to the Corps’ subsequent approval. Likewise, the Corps’ 2015 Final EIS for the ACT Master Water Control Manual Updates also deferred final consideration of the Weiss and Logan Martin proposals, pending additional analysis (and NEPA documentation).

Following extensive communication between Alabama Power and the Corps between 2015-2017, the parties agreed on the April 2018 Draft Hydrologic Engineering Management Plan (Appendix C, Attachment 7, Draft FR/SEIS). This plan provides an overview of the analyses already performed at that time in connection with the FERC proceedings, as well as the additional analyses required by the Corps to complete its review of these proposals for this proceeding. Alabama Power completed the additional modeling and provided it to the Corps by December 31, 2018. Alabama Power conducted a technical session at the Corps’ Mobile office on January 17, 2019. Alabama Power followed-up with the final technical report on February 15, 2019. (Appendix C, Attachment 6, Draft FR/SEIS).

III. Comments on the Corps’ Draft FR/SEIS

Alabama Power supports the TSP to the extent it includes MFO1—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.

A. Compliance with P.L. 83-436

Alabama Power agrees with the Corps' finding that MFO1 "provides more flood storage than the displaced valley storage," and "that the revised flood storage between Weiss and Logan Martin ... exceeds the proposed flood storage of Howell Mills Shoals" (Draft FR/SEIS, 4.5.3, p. 4-18.) Alabama Power also agrees that "[a]ny increases in water surface elevations seen downstream [under the TSP] are in fractions of a ft and, except for in events above the 1.0 percent annual chance exceedance, do not appear to expand the extent of flooding to previously unimpacted structures beyond marginal amounts." (Draft FR/SEIS at 5-51.)

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. In the period of time since licensing, much of the property upstream of the Weiss and 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.

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B. Overall Flood Risk in the Basin

Alabama Power agrees with the Corps that "[a]ny increases in water surface elevations seen downstream [under the TSP] are in fractions of a ft and, except for in events above the 1.0 percent annual chance exceedance, do not appear to expand the extent of flooding to previously unimpacted structures beyond marginal amounts" (Draft FR/SEIS at 5-51), and that MFO1 has "slightly beneficial flood impacts compared to the NAA." (*Id.* p. 4-26, -27)

The Draft FR/FEIS states (4.5.7, p. 4-21) that under MFO1 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

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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.

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.

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C. Additional Studies

The statements in the Draft FR/SEIS (*e.g.* 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.

K

D. Additional Easements

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.

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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.

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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.”)

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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.

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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.

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The proposed flood control plan will protect both the upstream structures 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.

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E. Recreation and Aesthetic Resources

Alabama Power agrees with the Corps finding (p. 4-26, -27) that MFO1 has “slight beneficial impacts to recreation at ... Weiss 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).

R

F. Dam Safety

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.

S

G. NEPA Considerations

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.

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For example, Alabama Power notes that Table 4-11 (p. 4-23) shows that MFO1 has no impacts on the state line flow drought trigger. And, Alabama Power agrees with the Corps that MFO1 “has no significant environmental effects compared to the NAA or other alternatives,” and was properly included in the TSP (p. 4-29).

U

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 *State of Alabama v. U.S. Army Corps of Engineers*, 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

V

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.

H. Hydropower

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.

W

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 A08, A09, and A11, Alabama Power notes that there was a very small difference from the base between three very different 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.

X

I. 4,640 Flow Commitment

In various places in the Corps’ Draft FR/SEIS and Appendices, the Corps suggests that Alabama Power’s 4,640 cfs flow commitment for navigation support is a requirement relevant to water quality. For example, the draft Logan Martin Manual states “While there are no specific operations at Logan Martin for Fish and Wildlife activities, APC’s flow target of 4,640 cfs (minimum 7-day average from Jordan, Bouldin, and Thurlow Projects), while principally intended to support downstream navigation and water quality needs, also provides sustained flows for fish and wildlife.” (FR/SEIS Appendix C at 7-4.) A few pages later, the draft Logan Martin Manual also states, “One of the water quality requirements in the ACT River basin is maintenance of a minimum flow in the lower river reaches. The natural low, seven-day-duration, flow expected to occur every ten years is the focus of regulation for water quality. This flow requirement is measured at Claiborne, on the Alabama River.” (*Id.* at 8-3).

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

Y

§ 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.

J. Cultural Resources

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.

Z

IV. Conclusion

Alabama Power appreciates the opportunity to provide these comments on the Corps' Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement 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 River Basin. We look forward to continuing to work with the Corps to implement the proposed changes at the Weiss and Logan Martin Reservoirs and are happy to provide you with any additional information reasonably necessary to that end. Please do not hesitate to contact us should you have any additional questions.

Sincerely,



Susan Comensky
Vice President Environmental Affairs
Alabama Power Company

From: Steve Forehand <SFOREHAND@russelllands.com>
Sent: Friday, January 31, 2020 4:05 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comments on DEIS Allatoona
Attachments: COE RL Comments on DEIS Allatoona Jan3120.pdf

Please accept comments on the Allatoona DEIS filed on behalf of Russell Lands, Inc.

Steve R. Forehand

ATTORNEY PRIVILEGED AND CONFIDENTIAL

The information contained in this message is privileged and confidential and is intended solely for the use of the individual(s) and/or entity(ies) named above. If you are not the intended recipient, you are hereby notified that any unauthorized disclosure, copying, distribution or taking of any action in reliance on the contents of the materials is strictly prohibited and review by an individual other than the intended recipient shall not constitute waiver of the attorney client privilege. If you have received this message in error, please notify the sender by reply message and delete this message from your system.



2544 Willow Point Road, Alexander City, AL 35010

January 31, 2020

VIA EMAIL

ACT-ACR@usace.army.mil

Colonel Sebastien Joly, Commander, USACE Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
P.O. Box 2288
Mobile, Alabama 36628

Re: Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement—Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoirs Project Water Control Manuals

Dear Colonel Joly:

I respectfully submit these comments on behalf of the Russell Lands, Inc. ("Russell Lands"). Russell Lands is a land development company located at Lake Martin, Alabama and employs over 800 people in central Alabama. Russell Lands has significant land holdings in three counties adjacent to Lake Martin.

After reviewing the Draft Feasibility Report and Integrated Supplemental Environmental Impact Statement (the "Draft EIS") referenced above, Russell Lands offers the following comments:

- Alabama Power Company ("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.
- 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

A

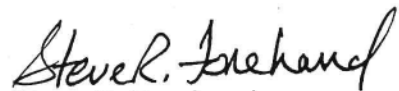
B

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.

- 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.
-

We appreciate the opportunity to comment of the Draft EIS and encourage the Corps to revise the EIS to include studies of the impact of Allatoona changes on Lake Martin and the Tallapoosa River system. We also encourage the Corps to require increased returns of treated wastewater to the Coosa system from Atlanta.

Thank you for your consideration.



Steve R. Forehand
Vice President, General Counsel
and Secretary

From: Karen Sewell <[REDACTED]>
Sent: Wednesday, November 27, 2019 10:59 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake winter levels

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. Also as a current resident on the lake it will provide more beauty than muddy ground.

Cordially,
Karen Sewell
Sent from my iPad

A
B

From: Tim O'Brien <[REDACTED]>
Sent: Wednesday, November 27, 2019 4:16 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Winter Pool Proposed Change

To whom it may concern:

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.

Thanks for your consideration.

Tim O'Brien
[REDACTED]

A

From: Wayne Brown <[REDACTED]>
Sent: Tuesday, November 26, 2019 7:39 PM
To: ACT-ACR
Subject: [Non-DoD Source]

Please leave Logan Martin alone and how it's always been.

A

From: Wayne Brown <[REDACTED]>
Sent: Sunday, January 26, 2020 5:00 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Winter Elevation

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.

A

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!

Respectfully,

H. Wayne Brown

--

Wayne Brown
[REDACTED]

P-06

From: j griffin <[REDACTED]>
Sent: Tuesday, November 26, 2019 6:40 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake

Please raise the winter level Two at lease 462 but without increasing the flood stage. 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 can not do with my property I would love another option Jerry griffin. [REDACTED]

A

B

Sent from my iPhone

P-07

From: Joy Redmon <[REDACTED]>
Sent: Tuesday, November 26, 2019 5:50 PM
To: ACT-ACR
Subject: [Non-DoD Source] Higher winter levels

So happy to hear this our water gets way to low! Thank you!

A

Sent from my iPhone

From: Rock & Linda Wester <[REDACTED]>
Sent: Tuesday, November 26, 2019 3:48 PM
To: ACT-ACR
Subject: [Non-DoD Source] Winter pools

I really don't understand why they only let 2 lakes down, Logan Martin & Weisse 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 floods...all the lakes would flood just a little.. instead of Logan Martin flooding 7'!

Linda Wester



A

From: Rock Wester <[REDACTED]>
Sent: Sunday, January 26, 2020 7:17 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake, Pell City Alabama

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 Wise 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.

A

From: Angela Boozer <[REDACTED]>
Sent: Tuesday, November 26, 2019 2:55 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake

Please consider raising the winter pool of our lake 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

Angela and David Boozer
[REDACTED]

Sent from my iPhone

A

From: Tonja Ramey <[REDACTED]>
Sent: Monday, November 25, 2019 7:58 PM
To: Linda Ruethemann
Cc: ACT-ACR
Subject: [Non-DoD Source] Re: Draft FR/SEIS

Looks good to me.

On Mon, Nov 25, 2019 at 12:04 PM Linda Ruethemann <[REDACTED]> wrote:

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.

Thank you for your consideration of this request.

Linda Ruethemann

Linda Ruethemann

Secretary

Logan Martin Lake Protection Association

[REDACTED]

[REDACTED]

QUANTITY QUALITY SAFETY



From: Tammie Roberts <[REDACTED]>
Sent: Monday, December 02, 2019 8:52 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level

Leaving the water up would be wonderful for the ppl who live full time and fish all year round! It would bring so much more money to the community as well.
Sent from my iPhone

A

B

From: Ashley Oneal <[REDACTED]>
Sent: Monday, December 02, 2019 8:51 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake weiss winter pool

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

A

From: Alan Roberts <[REDACTED]>
Sent: Monday, December 02, 2019 7:42 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level for Weiss

Hope the winter levels can be raised this would be great

A

From: Alan Roberts <[REDACTED]>
Sent: Tuesday, January 07, 2020 8:06 AM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss lake

Please raise the winter lake levels so we can enjoy the lake. It would help create jobs and the towns the lake servers.
Sent from my iPhone

A

From: Tambi York <[REDACTED]>
Sent: Monday, December 02, 2019 7:02 PM
To: ACT-ACR
Subject: [Non-DoD Source] Winter water level

Hello,

I would like to Eexpress my sincere disagreement with any decision to raise the Winger 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 22.5ft of water on our lots.

Please reconsider any thoughts of raising the Winger Water Levels for Lake Weiss.

Sincerely,
Tambi York

A

From: Carol Sears <[REDACTED]>
Sent: Monday, December 02, 2019 6:24 PM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss lake level

We live at Three Mile Creek. Does this mean we will be more likely to experience flooding? We lost everything last Feb. **A**

Carol sears
[REDACTED]

Carol
Roll Tide

From: david.danford <[REDACTED]>
Sent: Wednesday, December 04, 2019 1:43 PM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss lake water level

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. Although this 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, [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!] Please let this 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.

Sincerely,
David Danford

Sent from my Verizon, Samsung Galaxy smartphone

From: Malene Jennings <[REDACTED]>
Sent: Thursday, December 05, 2019 9:55 AM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss lake

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 !

Sent from my iPad

A

From: Charles Stover <[REDACTED]>
Sent: Sunday, December 08, 2019 9:44 PM
To: ACT-ACR
Subject: [Non-DoD Source] Request for ResSIM

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:

A

[REDACTED]

Thank you,

Charles Stover

US Army Corps
of EngineersALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALSFax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-09-19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: BrockLast Name: Haiderer

Title: _____

Organization

☐ Agency☐ Congressional☐ Company☒ General Public(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____☒ Email: _____☐ Mailing

Address: _____

Comment Categories

☐ Water Supply☐ Flood Storage☐ Water Management☐ Cultural Resources☐ Hydropower☒ Lake Levels☐ Threatened and
Endangered Species☒ Navigation☐ Economic Resources☐ Fisheries☐ Environmental
Resources☐ Other☐ Water Quality☒ Recreation

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin☐ Coosa Drainage Area☐ Etowah Drainage Area☐ Tallapoosa Drainage Area☐ Oostanaula Drainage Area☐ Alabama River☐ Mobile Bay☐ Other



US Army Corps
of Engineers

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REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

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(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

Raising the Weiss Lake water level by 3 ft
in the winter is a good idea for Recreation

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12/10/2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: TERRY BAUMER Last Name: BAUMER

Title: Refined

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☒ Phone: _____

☒ Email: _____

☐ Mailing
Address: _____

Comment Categories

- | | | |
|---|---|---|
| <input type="checkbox"/> Water Supply | <input type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input type="checkbox"/> Lake Levels |
| <input type="checkbox"/> Threatened and
Endangered Species | <input type="checkbox"/> Navigation | <input type="checkbox"/> Economic Resources |
| <input checked="" type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental
Resources | <input type="checkbox"/> Other |
| <input type="checkbox"/> Water Quality | <input checked="" type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|---|---|---|
| <input type="checkbox"/> Alabama-Coosa-
Tallapoosa (ACT) River Basin | <input checked="" type="checkbox"/> Coosa Drainage Area | <input type="checkbox"/> Etowah Drainage Area |
| <input type="checkbox"/> Tallapoosa Drainage Area | <input type="checkbox"/> Oostanaula Drainage Area | <input type="checkbox"/> Alabama River |
| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |



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AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

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(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

Keeping water levels up will help the
fishery and keep the people in the area
long to help the community in the that
~~area~~ ~~area~~ AREA

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!



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of Engineers

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Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-10-19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Michael Last Name: Culbertson
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____ ☐ Email: _____
☒ Mailing Address: [REDACTED]

Comment Categories

☒ Water Supply
☒ Cultural Resources
☒ Threatened and
Endangered Species
☒ Fisheries
☒ Water Quality

☒ Flood Storage
☒ Hydropower
☒ Navigation
☒ Environmental
Resources
☒ Recreation

☒ Water Management
☒ Lake Levels → *Main Concern*
☒ Economic Resources
☒ Other

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin
☐ Tallapoosa Drainage Area
☐ Mobile Bay

☐ Coosa Drainage Area ☐ Etowah Drainage Area
☐ Oostanaula Drainage Area ☐ Alabama River
☒ Other *Weiss Lake*



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MANUALS

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(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

I, among many others want to keep the
water level of Weiss lake up at least
3 foot higher than the current & past winter
water levels.

A

Mike Culberson
of [REDACTED]

This would help tourism, fishing & other
activities at a higher level.

Water level depends on the water level
to maintain many of the resorts & other
businesses in the area. We need your help.

B

Thank you

☐ Attach additional sheets of paper if you need more space for comments

nic

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile
District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are
important to you!

US Army Corps
of Engineers®ALLATOONA LAKE WATER SUPPLY STORAGE
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MANUALSFax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12/10/2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: JoeLast Name: Hayes

Title: _____

Organization

☐ Agency☐ Congressional☐ Company☒ General Public(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____☐ Email: _____☐ Mailing

Address: _____

Comment Categories

☐ Water Supply☐ Flood Storage☐ Water Management☐ Cultural Resources☐ Hydropower☒ Lake Levels☐ Threatened and
Endangered Species☐ Navigation☐ Economic Resources☐ Fisheries☐ Environmental
Resources☐ Other☐ Water Quality☐ Recreation

Geographic Area of Interest

☐ Alabama-Coosa-
Tallapoosa (ACT) River Basin☒ Coosa Drainage Area☐ Etowah Drainage Area☐ Tallapoosa Drainage Area☐ Oostanaula Drainage Area☐ Alabama River☐ Mobile Bay☐ Other



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RESERVOIRS PROJECT WATER CONTROL
MANUALS

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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

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
90 Devil motor or a Flat Bottom
Boat with small motor.

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are
important to you!

US Army Corps
of EngineersALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
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MANUALSFax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12/10/19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Glenn Brown Last Name: Brown
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____ ☒ Email: [REDACTED]
☐ Mailing
Address: _____

Comment Categories

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Water Supply | <input type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input checked="" type="checkbox"/> Lake Levels |
| <input type="checkbox"/> Threatened and
Endangered Species | <input type="checkbox"/> Navigation | <input type="checkbox"/> Economic Resources |
| <input type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental
Resources | <input type="checkbox"/> Other |
| <input type="checkbox"/> Water Quality | <input type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|---|--|---|
| <input type="checkbox"/> Alabama-Coosa-
Tallapoosa (ACT) River Basin | <input type="checkbox"/> Coosa Drainage Area | <input type="checkbox"/> Etowah Drainage Area |
| <input type="checkbox"/> Tallapoosa Drainage Area | <input checked="" type="checkbox"/> Oostanaula Drainage Area | <input type="checkbox"/> Alabama River |
| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

Raising of winter pool on Weiss Lake is long overdue. It will have a very important impact on Cherokee Co. AL.

Metro Atlanta should be forced to conserve more before being allowed to steal water from an area far from their area. They take water from our area & return the treated waste water 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 5000 many water leaks & waste so much water!!!

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

US Army Corps
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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-11-2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: LamarLast Name: Smith

Title: _____

Organization

☐ Agency
(federal, state, or
local)☐ Congressional☐ Company☐ General Public

Organization: _____

Preferred Method of Communication either☐ Phone: _____☒ Email: _____☐ Mailing
Address: _____

Comment Categories

- ☐
- Water Supply
-
- ☐
- Cultural Resources
-
- ☐
- Threatened and
-
- Endangered Species
-
- ☐
- Fisheries
-
- ☐
- Water Quality

- ☐
- Flood Storage
-
- ☐
- Hydropower
-
- ☐
- Navigation
-
- ☐
- Environmental
-
- Resources
-
- ☐
- Recreation

- ☐
- Water Management
-
- ☒
- Lake Levels
-
- ☐
- Economic Resources
-
- ☐
- Other

Geographic Area of Interest

- ☒
- Alabama-Coosa-
-
- Tallapoosa (ACT) River Basin
-
- ☐
- Tallapoosa Drainage Area
-
- ☐
- Mobile Bay

- ☐
- Coosa Drainage Area
-
- ☐
- Oostanaula Drainage Area
-
- ☐
- Other

- ☐
- Etowah Drainage Area
-
- ☐
- Alabama River



US Army Corps
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DRAFT FR/SEIS - COMMENT FORM

Comment	
<p>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.</p> <p>Our Concerns:</p> <p>We prefer 6 foot winter level draw down to do repairs to docks, jet ski lifts, boat ramp and seawalls.</p>	A
<p>Also concerned higher winter level could result in more damage caused by winter flooding which often occurs Feb-March time frame.</p>	B

☐ Attach additional sheets of paper if you need more space for comments

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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: DEC 14, 19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: MARK WASHINGTON Last Name: WASHINGTON
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☐ General Public
(federal, state, or
local)Organization: NA

Preferred Method of Communication

☐ Phone: _____ ☐ Email: _____
☐ Mailing
Address: _____

Comment Categories

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Water Supply | <input type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input checked="" type="checkbox"/> Lake Levels |
| <input checked="" type="checkbox"/> Threatened and
Endangered Species | <input type="checkbox"/> Navigation | <input type="checkbox"/> Economic Resources |
| <input checked="" type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental
Resources | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Water Quality | <input type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|---|---|---|
| <input type="checkbox"/> Alabama-Coosa-
Tallapoosa (ACT) River Basin | <input type="checkbox"/> Coosa Drainage Area | <input type="checkbox"/> Etowah Drainage Area |
| <input type="checkbox"/> Tallapoosa Drainage Area | <input type="checkbox"/> Oostanaula Drainage Area | <input type="checkbox"/> Alabama River |
| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |



US Army Corps
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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

Shared the no change in amount of water
flowing across state line, even in dry
seasons.

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

US Army Corps
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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-11-19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Konnie Last Name: Shaw

Title: _____

Organization

☐ Agency (federal, state, or local) ☐ Congressional ☐ Company ☒ General PublicOrganization: Weiss Lake impairment

Preferred Method of Communication

☐ Phone: _____ ☐ Email: _____
☐ Mailing Address: _____

Comment Categories

- | | | |
|--|--|---|
| <input type="checkbox"/> Water Supply | <input type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input type="checkbox"/> Lake Levels |
| <input type="checkbox"/> Threatened and Endangered Species | <input type="checkbox"/> Navigation | <input type="checkbox"/> Economic Resources |
| <input type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental Resources | <input type="checkbox"/> Other |
| <input type="checkbox"/> Water Quality | <input type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Alabama-Coosa-Tallapoosa (ACT) River Basin | <input type="checkbox"/> Coosa Drainage Area | <input type="checkbox"/> Etowah Drainage Area |
| <input type="checkbox"/> Tallapoosa Drainage Area | <input type="checkbox"/> Oostanaula Drainage Area | <input type="checkbox"/> Alabama River |
| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |



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DRAFT FR/SEIS - COMMENT FORM

Comment

Thanks for All of yall help in understanding
Whats going

A



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ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-11-2019

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Helen Last Name: Graban

Title: owner of lake lots

Organization

☐ Agency ☐ Congressional ☐ Company ☐ General Public
(federal, state, or
local)

Organization: Individual lots

Preferred Method of Communication

☐ Phone: [REDACTED] ☐ Email: [REDACTED]
☐ Mailing
Address: [REDACTED]

Comment Categories

☐ Water Supply ☐ Flood Storage ☐ Water Management
☐ Cultural Resources ☐ Hydropower ☒ Lake Levels
☐ Threatened and ☐ Navigation ☐ Economic Resources
Endangered Species
☐ Fisheries ☐ Environmental ☐ Other
Resources
☐ Water Quality ☐ Récreation

Geographic Area of Interest

Weiss Lake
☐ Alabama-Coosa- ☒ Coosa Drainage Area ☐ Etowah Drainage Area
Tallapoosa (ACT) River Basin
☐ Tallapoosa Drainage Area ☐ Oostanaula Drainage Area ☐ Alabama River
☐ Mobile Bay ☐ Other



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DRAFT FR/SEIS - COMMENT FORM

Comment

We own a few lake lots (Weiss Lake). 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.

A

We realize folks love to fish, so do we, but in winter, with lower water levels, cold weather permits 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.

B

Will you lower the lake to allow us to do maintenance?

C

☐ Attach additional sheets of paper if you need more space for comments

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Thank you for helping us to understand what resources in the ACT River Basin are important to you!

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DRAFT FR/SEIS - COMMENT FORM

Date: 12-12-19 Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Charles Last Name: Lawrence

Title: _____

Organization

☒ Agency(federal, state, or
local)☐ Congressional☐ Company☐ General PublicOrganization: LM LPA

Preferred Method of Communication

☐ Phone: _____☐ Mailing
Address: _____☒ Email: [REDACTED]

Comment Categories

☐ Water Supply☐ Cultural Resources☐ Threatened and
Endangered Species☒ Fisheries☒ Water Quality☐ Flood Storage☐ Hydropower☐ Navigation☐ Environmental
Resources☒ Recreation☐ Water Management☒ Lake Levels☐ Economic Resources☐ Other

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin☐ Tallapoosa Drainage Area☐ Mobile Bay☒ Coosa Drainage Area☐ Oostanaula Drainage Area☐ Other☐ Etowah Drainage Area☐ Alabama River



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DRAFT FR/SEIS - COMMENT FORM

Comment

Reduce water diversion to Allatoona
if allowed will disrupt coast water
flow —

A

Raise Water level for Logan Martin
in the winter from current 460
to 462 & ~~then~~ better use of Logan
Martin improve the ~~fishery~~ fishery

B

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are
important to you!

From: James Bryan <[REDACTED]>
Sent: Tuesday, December 10, 2019 2:50 PM
To: ACT-ACR
Subject: [Non-DoD Source] Winter Water Levels at Weiss Lake
Attachments: Weiss Lake Levels.1.pdf; Weiss Lake Levels.2.pdf; Weiss Lake Levels.3.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Please see the attached three pages on damages caused at Weiss Lake due to rising winter lake levels.

James W. Bryan
Property Owner
[REDACTED]



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12-10-19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: James

Last Name: Bryan

Title: Property Owner - Weiss Lake

Organization

☐ Agency
(federal, state, or
local)

☐ Congressional

☐ Company

☒ General Public

Organization: _____

Preferred Method of Communication

☐ Phone: _____

☐ Email: _____

☐ Mailing
Address: _____

Comment Categories

☐ Water Supply

☐ Flood Storage

☐ Water Management

☐ Cultural Resources

☐ Hydropower

☒ Lake Levels

☐ Threatened and
Endangered Species

☐ Navigation

☐ Economic Resources

☐ Fisheries

☐ Environmental
Resources

☐ Other

☐ Water Quality

☐ Recreation

Geographic Area of Interest

☐ Alabama-Coosa-
Tallapoosa (ACT) River Basin

☐ Coosa Drainage Area

☐ Etowah Drainage Area

☐ Tallapoosa Drainage Area

☐ Oostanaula Drainage Area

☐ Alabama River

☐ Mobile Bay

☒ Other Weiss Lake



US Army Corps
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DRAFT FR/SEIS - COMMENT FORM

Comment

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 or greater. We start seeing minor damage to Boat, Lift, walkway and lift at 568 and major damage at 572 feet.

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.

James W. Bryan

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

Feb 2019 - This was late at 569 feet.
It went to 572 feet and showed boat
into top of boat house.

Boat was totaled - \$30,000

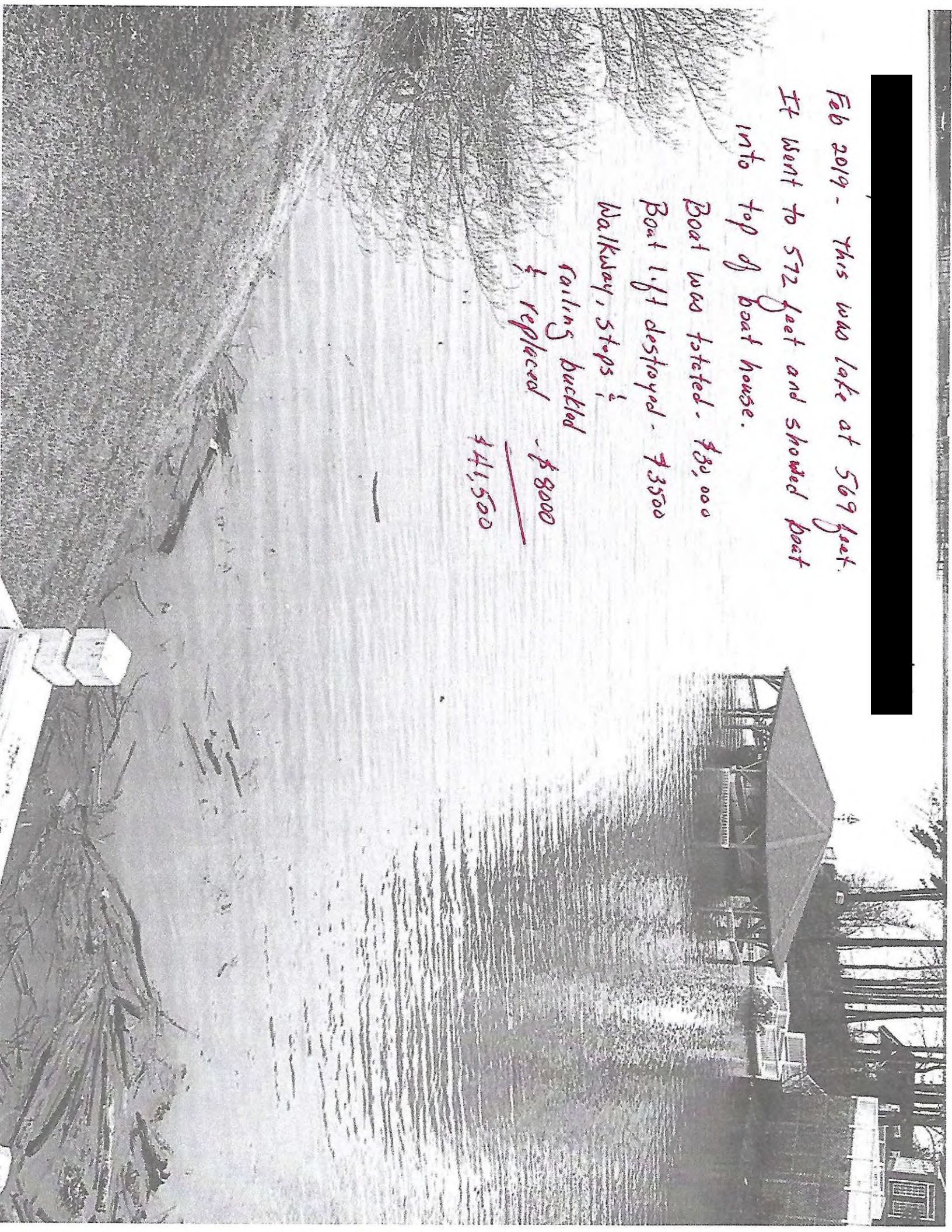
Boat lift destroyed - \$3500

Walkway, steps &

sailing buckled

& replaced - \$8000

\$41,500



From: Terry Lewis <[REDACTED]>
Sent: Wednesday, December 11, 2019 11:38 AM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss Lake Winter level

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.

Vivian Lewis
[REDACTED]

Sent from my iPhone

A

From: Richard Healy <[REDACTED]>
Sent: Thursday, December 12, 2019 8:21 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Level

Follow Up Flag: Follow up
Flag Status: Flagged

Hello

As a homeowner on the above subject lake 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).

A

Thank you
Richard Healy

Sent from my iPhone

From: Garrett Burgess <[REDACTED]>
Sent: Thursday, December 12, 2019 7:51 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake levels

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Garrett Burgess, I live in choccolocco creek. 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.

Thanks

Garrett Burgess

Sent from my iPhone

A

From: Don Urso <[REDACTED]>
Sent: Sunday, January 26, 2020 1:40 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake Level Logan Martin.

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.

Don Urso
Owner-Coosa Queen

A

From: r berryhill <[REDACTED]>
Sent: Sunday, January 26, 2020 10:28 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan martin lake

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 bouys....docks...slues... 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 routinely...we pay to live on a lake we can only access 1/2 a year or less!!

RB

A

From: sheila bawner <[REDACTED]>
Sent: Thursday, December 12, 2019 6:44 PM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss Lake Water Levels

Follow Up Flag: Follow up
Flag Status: Flagged

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.

A

P-41

From: Lee <[REDACTED]>
Sent: Thursday, December 12, 2019 12:25 PM
To: ACT-ACR
Subject: [Non-DoD Source] Water Level Possible Flood ?

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from [Mail](#) for Windows 10

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.

The open houses are slated to take place at the following locations:

Acworth, Georgia: Monday, Dec. 9, from 4 p.m. to 8 p.m. at the Acworth Community Center, 4361 Cherokee St.

Rome, Georgia: Tuesday, Dec. 10 from 4 p.m. to 8 p.m. at the Forum River Civic Center, Berry/Shorter Room, 301 Tribune St.

Gadsden, Alabama: Wednesday, Dec. 11 from 4 p.m. to 8 p.m. at the Pitman Theater, 629 Broad St.

Childersburg, Alabama: Thursday, Dec. 12 from 4 p.m. to 8 p.m. at Friends of Eighth, 109 8th Avenue S.W.

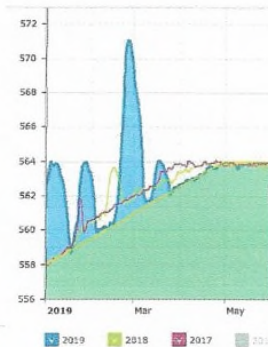
In addition to the open houses, the public can submit comments or questions by emailing act-acr@usace.army.mil or writing to Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mobile, AL 36628.

A final decision is not expected until spring 2021.

A

If THE March 2018 flood had started with 3feet higher, WATER LEVEL, THINK HOW MUCH WATER WOULD HAVE BEEN OUT OF THE BANKS

B



From: Lee <[REDACTED]>
Sent: Monday, December 16, 2019 12:46 PM
To: ACT-ACR
Subject: [Non-DoD Source] winter water level increase

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.

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Gadsden, Alabama: Wednesday, Dec. 11 from 4 p.m. to 8 p.m. at the Pitman Theater, 629 Broad St.

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A final decision is not expected until spring 2021.

If THE March 2018 flood had started with 3feet higher, WATER LEVEL, THINK HOW MUCH WATER WOULD HAVE BEEN OUT OF THE BANKS

Raiseing winter water level 3feet

To: act-acr@usace.army.mil

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

Sent from [Mail](#) for Windows 10

Sent from [Mail](#) for Windows 10

From: Lee <[REDACTED]>
Sent: Monday, December 16, 2019 12:10 PM
To: ACT-ACR
Subject: [Non-DoD Source] Raiseing winter water level 3feet

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

A

Sent from [Mail](#) for Windows 10

From: Lee <[REDACTED]>
Sent: Tuesday, December 17, 2019 4:00 PM
To: ACT-ACR
Subject: [Non-DoD Source] Weiss lake water level

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.

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Gadsden, Alabama: Wednesday, Dec. 11 from 4 p.m. to 8 p.m. at the Pitman Theater, 629 Broad St.

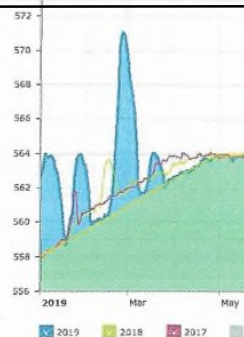
Childersburg, Alabama: Thursday, Dec. 12 from 4 p.m. to 8 p.m. at Friends of Eighth, 109 8th Avenue S.W.

In addition to the open houses, the public can submit comments or questions by emailing act-acr@usace.army.mil or writing to Commander, U.S. Army Corps of Engineers, Mobile District, Attn: PD-EI (ACT-ACR DSEIS), P.O. Box 2288, Mobile, AL 36628.

A final decision is not expected until spring 2021.

act-acr@usace.army.mil

If THE March 2018 flood had started with 3feet 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 Dec31 2015 and Common sense should provide the answer.

Let the Marinas dredge out in the area around them to get their 3feet in the winter, as they have been doing for 50 years instead of making present land owners have to pay for the damages.

From: Lee <[REDACTED]>
Sent: Thursday, December 26, 2019 11:26 AM
To: ACT-ACR
Subject: [Non-DoD Source] Flood possibility ?

Thursday Dec 26, 2019



Please note and take into consideration, if the winter pool raise of 3ft had been imposed at this date, (requested by the lady at the marina) we would now be at summer pool level with 2 days rain forecasted in the next 3 days

A

National Weather Service Forecast for Cedar Bluff AI

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%.

Sunday

Showers and possibly a thunderstorm. High near 69. Chance of precipitation is 100%.

Sunday Night

Showers likely, mainly before midnight. Mostly cloudy, with a low around 46. Chance of precipitation is 60%

Knowing the lake below Gadsden has an easement of only 1 foot does not sound good for either Lake

P-41e

From: Lee <[REDACTED]>
Sent: Saturday, December 28, 2019 9:30 AM
To: ACT-ACR
Subject: [Non-DoD Source] Dec 2019 Water Level
Attachments: Snip 01.JPG

Sent from [Mail](#) for Windows 10

Weiss Lake Water



Please note and take into consideration, if the winter pool raise of 3ft had been imposed at this date, (requested by the lady at the marina) we would now be at summer pool level with 2 days rain forecasted in the next 3 days

National Weather Service Forecast for Cedar Bluff AI

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%.

Sunday

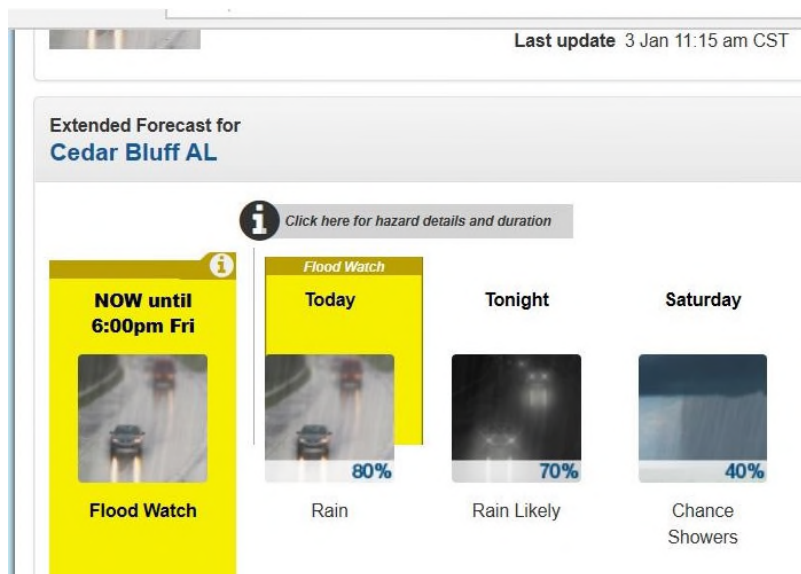
Showers and possibly a thunderstorm. High near 69. Chance of precipitation is 100%.

Sunday Night

Showers likely, mainly before midnight. Mostly cloudy, with a low around 46. Chance of precipitation is 60%

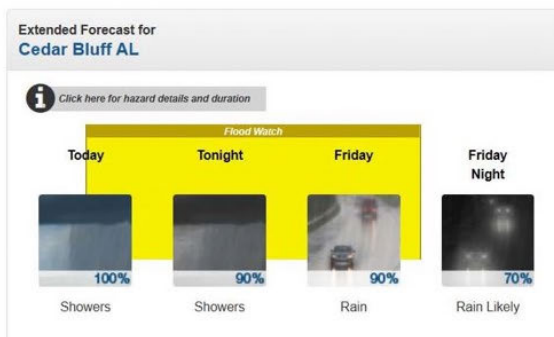
P-41f

From: Lee <[REDACTED]>
Sent: Friday, January 03, 2020 12:40 PM
To: ACT-ACR
Cc: [REDACTED]
Subject: [Non-DoD Source] Dec Flood watch



A

From: Lee <[REDACTED]>
Sent: Thursday, January 02, 2020 1:23 PM
To: ACT-ACR
Subject: [Non-DoD Source] Flood watch



Weiss Lake Residents are lucky tThat The 3 Feet Winter Drawdown
Level Has Not Been Imposed Yet At This Time.
Please Email to act-acr@usace.army.mil

From: John Gilreath <[REDACTED]>
Sent: Friday, December 13, 2019 12:29 AM
To: ACT-ACR
Subject: [Non-DoD Source]

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.

A

From: Donna Nicholson <[REDACTED]>
Sent: Thursday, December 12, 2019 11:02 PM
To: ACT-ACR
Subject: [Non-DoD Source] Raise Logan Martin Lake

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!

A

Resident on Logan Martin Lake

Donna Nicholson
[REDACTED]

From: Stanley Caufield <[REDACTED]>
Sent: Thursday, December 12, 2019 9:23 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level

Please raise the winter level up. By doing so I can actually get out of my boathouse to enjoy the lake. Thank you

A

Craig Caufield

Sent from my iPhone

From: Jennifer Joy <[REDACTED]>
Sent: Thursday, December 12, 2019 8:30 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels

My name is Jennifer Joy and I live in Cropwell in the lake 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.

Sent from my iPhone

A

From: Pete W <[REDACTED]>
Sent: Friday, December 13, 2019 12:42 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake Levels Logan Martin Lake 2019

Just be be very brief here. My thoughts are this lake 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. Wiess Lake for example also was flooded for weeks. I have live 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

Thanks

Peter

From: karen.oliver <[REDACTED]>
Sent: Friday, December 13, 2019 9:08 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan-Martin Water Level

Dear Sir:

As a full time resident we would encourage and support the winter pool at 462 feet. This would allow us to do repairs and extend our boating season.

A

We reside at [REDACTED] located at the mouth of Chocolocco Creek.

Thank you for this consideration.

Steve and Karen Oliver

Sent from my Verizon, Samsung Galaxy smartphone

From: Wendy <[REDACTED]>
Sent: Friday, December 13, 2019 3:20 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

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 Awesone in so many respects. Thank you so much for your consideration & may all if you have a Merry Christmas & Happy New Year!

A

Sent from AOL Mobile Mail

From: Will Ebbert <[REDACTED]>
Sent: Friday, December 13, 2019 8:51 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Winter Lake Level

Hello,

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!

Sincerely,
Will Ebbert

A


From: sandrasphoto <[REDACTED]>
Sent: Friday, December 13, 2019 6:18 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan martin Lake

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

Sandra and Ricky Perkins

A

From: Pamela Galbreath <[REDACTED]>
Sent: Friday, December 13, 2019 6:02 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake levels

We live at [REDACTED] 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!!

[Sent from Yahoo Mail for iPhone](#)

A

From: [REDACTED]
Sent: Friday, December 13, 2019 5:44 PM
To: ACT-ACR
Subject: [Non-DoD Source] Fwd: Proposed new winter lake level at Logan Martin Lake

Sent from my iPhone

Begin forwarded message:

From: JeffnKim Smith <[REDACTED]>
Date: December 13, 2019 at 7:37:26 AM CST
To: ACT-ACR@usage.army.mil
Subject: Proposed new winter lake level at Logan Martin Lake

Hello, my name is Kimberly Smith, and I am a homeowner on Logan Martin ([REDACTED]). 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.

A

From: Teresa Hammond <[REDACTED]>
Sent: Friday, December 13, 2019 3:48 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake levels Logan Martin

Please leave our lake levels up in the winter. Dropping the level limits our use of the lake in areas.

A

Teresa Hammond
[REDACTED]

Sent from my iPhone

From: Carl Wyatt <[REDACTED]>
Sent: Saturday, December 14, 2019 11:03 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Pool Level Increase

I live on Logan Martin Lake on the main river channel at [REDACTED]. 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. [REDACTED]

[REDACTED] 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. Any consideration you can give will be greatly appreciated.

Respectfully,
Carl H. Wyatt Jr.

A

From: Bobby Tidwell <[REDACTED]>
Sent: Saturday, December 14, 2019 1:25 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Matin winter pool

I would like to Express my concerns over raising winter pool 2 feet. 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

Bobby Tidwell
I am in the upper river area of Kikers campground

A

From: Donna Smith <[REDACTED]>
Sent: Saturday, December 14, 2019 11:42 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake levels

Please leave our lake levels up in the winter. Dropping the level limits our use of the lake in areas. We live on [REDACTED] in Riverside making it impossible to get our boat out in the winter.

A

--

Sent from Gmail Mobile

From: Martha Jenkins <[REDACTED]>
Sent: Saturday, December 14, 2019 11:36 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake water level

We live in a slough off Rabbit Branch and are in favor of raising the winter pool. 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.

Martha Jenkins
[REDACTED]

A





From: Kim Cairnes <[REDACTED]>
Sent: Saturday, December 14, 2019 9:58 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level for Logan Martin

We are located in the area of Camp Cosby. We would like the water 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

A

Thanks
Kim Jordan

[Sent from Yahoo Mail on Android](#)

From: Sean Connelly <[REDACTED]>
Sent: Saturday, December 14, 2019 9:41 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level on logan martin

I believe that lake level 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.

A

Sent from my iPhone

From: [REDACTED]
Sent: Saturday, December 14, 2019 8:04 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels

Would like the lake to stay close to full pool year around, this would improve fishing and the aesthetics of the lake.
Chocolocco creek area
Thanks,
Mark Thornton

A

From: Christopher Ray <[REDACTED]>
Sent: Monday, December 16, 2019 9:45 AM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona Water Supply Comment
Attachments: copier@dowdys.net_20191216_092950.pdf

Please find attached comments concerning the Allatoona Lake Water Supply Storage Reallocation Study

-----Original Message-----

From: copier@dowdys.net [mailto:copier@dowdys.net] On Behalf Of copier@
Sent: Monday, December 16, 2019 8:30 AM
To: [REDACTED]
Subject: Scanned image from 7328

Reply to: copier@dowdys.net <copier@dowdys.net> Device Name: 7328 Device
Model: MX-2640N
Location: Not Set

File Format: PDF (Medium)
Resolution: 200dpi x 200dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

Adobe, the Adobe logo, Acrobat, the Adobe PDF logo, and Reader are registered trademarks or trademarks of Adobe Systems Incorporated in the United States and other countries.

Blocked<https://clicktime.cloud.postoffice.net/clicktime.php?U=http%3A%2F%2Fwww.adobe.com%2F&E=christopherray%40exba.com&X=XID763XLPoh87205Xd3&T=TEXB&HV=U,E,X,T&H=3b7720f6eb69754a1eb9aa301f2100780dab70f9>

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US Army Corps
of Engineers®

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 12/16/19

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Chris Last Name: Ray
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☒ Phone: [REDACTED] ☐ Email: _____
☐ Mailing
Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input type="checkbox"/> Threatened and Endangered Species	<input type="checkbox"/> Navigation	<input type="checkbox"/> Economic Resources
<input type="checkbox"/> Fisheries	<input type="checkbox"/> Environmental Resources	<input type="checkbox"/> Other
<input type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	

Geographic Area of Interest

<input type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input checked="" type="checkbox"/> Other	



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

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 ~~be~~ 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.

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

From: Kenneth Jones <[REDACTED]>
Sent: Monday, December 16, 2019 2:00 AM
To: ACT-ACR
Subject: [Non-DoD Source]

My name is Kenneth Jones and I would like to see the lake level 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

A

From: Steve Hogg <[REDACTED]>
Sent: Tuesday, December 17, 2019 8:00 PM
To: ACT-ACR
Subject: [Non-DoD Source] Higher Lake Levels

I would love the lake level 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!

A

V/R. Stephen L Hogg
LtCol USAF/Retired



(Eastland Shores)

Sent from my iPhone

P-90

$$\frac{A}{B}$$

Sent from my Verizon, Samsung Galaxy smartphone

From: Bill Dunn <[REDACTED]>
Sent: Tuesday, December 17, 2019 6:11 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake levels

To whom it may concern:

I would love to see the winter lake levels 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.

Bill

A

From: Tim Kettermann <[REDACTED]>
Sent: Tuesday, December 17, 2019 3:37 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake levels

Yes, please raise the winter pool! I live on [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 Kettermann. **A**

Sent from my iPad

From: [REDACTED]
Sent: Tuesday, December 17, 2019 2:02 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake levels

Please, please leave the lake level 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.

A

Thank you for considering this,
Jennifer Ebbert
[REDACTED]

From: Lloyd Hofer <[REDACTED]>
Sent: Tuesday, December 17, 2019 10:48 AM
To: ACT-ACR
Subject: [Non-DoD Source] Concerns and Comments re Weiss Lake Winter Pool raise
Attachments: ATT00001.txt; ATT00002.txt; ATT00003.txt; ATT00004.txt

Weiss Lake Winter Pool Level Raise December 19, 2019

December 14, 2019

Commander, USACE Mobile District

Attn: PD-EI (ACR DSEIS)

P.O. Box 2288

Mobile, AL 36626-0001

Re: Weiss Lake Winter Level Raise 558-561 feet Flood Control Concerns

Dear Commander,

Thank you for all your efforts and hard work of the US Army Corps of Engineers managing the Alabama-Coosa-Tallapoosa (ACT) River Basin interstate waterway.

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.

A

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."

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.

B

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.

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.

C

I would appreciate very much addressing my comments and concerns. I appreciate the USACE public forums and regret I was not able to attend one. I wish you every success in addressing these Weiss Lake issues I have raised, and a successful partnership with APC in effective flood control for all of us who live in the APC.

Respectfully,

Lloyd M Hofer M.D., M.P.H.

[REDACTED]

[REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

4 Photo attachments

From: Lynn Lawrence <[REDACTED]>
Sent: Wednesday, December 18, 2019 11:25 AM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona-Coosa Reallocation Study FR/SEIS (Logan Martin)

To ALL Concerned,

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 and 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 insure a stable water level even as additional water is diverted to meet the water needs and diversion of water for Atlanta

Please contact me if you have any questions.

Spirit of 1776 & Proud NRA Life Member
Charles Lynn Lawrence
[REDACTED]

A

From: Nancy douglas <[REDACTED]>
Sent: Wednesday, December 18, 2019 8:00 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake level changes

Hello,
I live on the Coosa River just north of the Stemley bridge.

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?

A

I see the water go up and down quickly sometimes so know that there is the ability to control the level quickly if wanted.

Regards,
Nanxy Douglas

[REDACTED]

From: JOHNSON, ARLENE G <[REDACTED]>
Sent: Wednesday, December 18, 2019 6:55 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels Comment

Hi - I'm commenting on the effect of winter lake levels on Logan Martin Lake from a residential perspective.

We live in the [REDACTED] (near Stemley Bridge) on the Pell City side and have 4' of water in full pool at our piers. At winter pool there is no water at our piers and if very low we can walk across the point of the cove.

My husband and I are also certified lake testers (Alabama Water Watch) and have a designated site for monthly testing/reporting of various water chemistry levels across the lake on the Talladega side near the bridge.

Higher water levels 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
-

- 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?
-

David W. & Arlene G. Johnson

[REDACTED]
[REDACTED]

From: Wade Cole <[REDACTED]>
Sent: Wednesday, December 18, 2019 2:58 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level

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.

Wade Cole
[REDACTED]

Sent from my iPhone

A

From: Phyllis Simpson <[REDACTED]>
Sent: Wednesday, December 18, 2019 2:12 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake levels

We are Dan and Phyllis Simpson [REDACTED]. 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.

Sent from my iPhone

A

From: Bruce Keen <[REDACTED]>
Sent: Wednesday, December 18, 2019 1:36 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin 2020 Winter Pool Variance

Dear USACE,

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.

A

Thanks for the time to consider this change and for accepting my support.

Merry Christmas and Happy New Year!

Best regards, Bruce Keen

[REDACTED]

Sent from my iPhone

From: Jim Williams <[REDACTED]>
Sent: Thursday, December 19, 2019 8:16 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels

I have a house [REDACTED] 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.

Thank you,

Sent from my iPhone

Jim Williams
[REDACTED]

A

From: WILLIAM BROM <[REDACTED]>
Sent: Thursday, December 19, 2019 4:57 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level

It would be great if the lake level 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!

William Brom
[REDACTED]

A

From: Sherry Davis <[REDACTED]>
Sent: Thursday, December 19, 2019 12:20 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake levels

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.

[REDACTED]

Pell city, Al.

A

From: Pat Sparks <[REDACTED]>
Sent: Wednesday, December 18, 2019 3:57 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels

We would like for the lake level 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

Jim & Pat Sparks
[REDACTED]

A

From: Doug Adamson <[REDACTED]>
Sent: Friday, December 20, 2019 6:23 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake proposed winter level

A quick note to voice support for the winter pool level of 462 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.

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.

Thank you for your consideration,

Doug Adamson

Sent from [Mail](#) for Windows 10

From: Al Guido <[REDACTED]>
Sent: Friday, December 20, 2019 6:08 PM
To: ACT-ACR
Subject: [Non-DoD Source] Coosa River Reallocation

To Whom It May Concern:

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.

A

From: James Starnes <[REDACTED]>
Sent: Friday, December 20, 2019 5:47 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake-ACR Study

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.

A

Jim Starnes

--
James H. Starnes
JimStarnesLaw

[REDACTED]
[REDACTED]
[REDACTED]

From: Fred Crown <[REDACTED]>
Sent: Friday, December 20, 2019 5:46 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comment on Allatoona-Coosa Reallocation Study in the Alabama-Coosa-Tallapoosa River Basin

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.

Frederick Crown
[REDACTED]

A

From: Larry <[REDACTED]>
Sent: Friday, December 20, 2019 4:54 PM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona Lake Water Supply Storage Reallocation Study

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. I disagree with increasing the flow to the city of Atlanta. Georgia and Atlanta should be building new Reservoirs to satisfy their growth.

Larry

A

B

From: Vicky Pearson <[REDACTED]>
Sent: Saturday, December 21, 2019 7:11 PM
To: ACT-ACR
Subject: [Non-DoD Source] Raising Logan Martin Winter Level

To whom it may concern:

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.

Thank you,

Vicky Pearson

[REDACTED]

Sent from my iPhone

A

From: elisehammond <[REDACTED]>
Sent: Saturday, December 21, 2019 3:38 PM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona-Coosa Reallocation Study (ACR Study) re: Request from APC to modify current flood operations at Weiss & Logan Martin reservoir projects

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.

A

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.

We also recognize the advantages to the Corps and to APC for more flood flexibility and greater power generation reserves.

B

We appreciate your consideration to move forward in approval of the proposed increase to winter pool.

Regards,

Robert & Elise Hammond

From: Marshall L Watson <[REDACTED]>
Sent: Saturday, December 21, 2019 9:11 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin winter water level

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.

A

From: akelly7322 <[REDACTED]>
Sent: Sunday, December 22, 2019 3:59 PM
To: ACT-ACR
Subject: [Non-DoD Source] 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 enviromental perspectiv...

A

Sent from my Verizon, Samsung Galaxy smartphone

From: Rob Staniszewski <[REDACTED]>
Sent: Sunday, December 22, 2019 1:14 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level

I would be in favor of a higher level of the lake 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

A

Sent from my iPhone

From: Nora Stokes <[REDACTED]>
Sent: Sunday, January 26, 2020 1:38 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Winter Pool Levels

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.

A

Sent from my iPhone

From: Glenn Gardner <[REDACTED]>
Sent: Sunday, December 22, 2019 9:25 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Level

Please leave the winter lake level up to 462. It was so nice to be able to get my pontoon out and see the winter foliage, the last time you did this.

Thanks

Glenn Gardner
[REDACTED]

About 1 mile north of the dam.

Sent from my iPhone

"Find a way to have FUN" 🤪

A

From: [REDACTED]
Sent: Monday, December 23, 2019 9:22 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Level

To Whom it may Concern:

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

A higher lake level would give us access to the water from our boathouse an additional 2-3 months of the year.

Thank you for your consideration.

Sincerely,

Steve & Barbara Bishop

[REDACTED]

Sent from [Mail](#) for Windows 10

From: Cheryl <[REDACTED]>
Sent: Monday, December 23, 2019 6:30 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comments on the Draft Feasibility Report and Integrated Supplemental EIS for the Allatoona-Coosa Reallocation Study in the Alabama-Coosa-Tallapoosa River Basin

Dear Sir:

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.

A

You and your contractor are to be congratulated on the depth and scope of your Feasibility report.

B

Keep up the good work,

Charles Romanus
LTC, US Army Retired

From: Jerry Culberson <[REDACTED]>
Sent: Monday, December 23, 2019 2:32 PM
To: ACT-ACR
Subject: [Non-DoD Source] Proposed change in winter water level for Weiss Lake, Logan Martin Lake, and Allatoona Lake

I support the proposed changes in winter lake levels for the above referenced lakes. 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.

A

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.

Regards,

Jerry and Patricia Culberson

[REDACTED] [REDACTED]

From: Dianne Scoggins <[REDACTED]>
Sent: Wednesday, December 25, 2019 8:02 PM
To: ACT-ACR
Subject: [Non-DoD Source] Water levels for 2021

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.

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.

Thanks,

Dale and Dianne Scoggins

From: Pat Sparks <[REDACTED]>
Sent: Tuesday, December 24, 2019 4:39 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

Could it be a possibility that the winter lake level 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!

Thanks for considering!

A

From: Lee Isaacs <[REDACTED]>
Sent: Thursday, December 26, 2019 6:41 PM
To: ACT-ACR
Subject: [Non-DoD Source] Winter water levels on Logan Martin Lake

I would like to declare my voice in favor of raising the winter water level from 460' to 462' as per APC's request.

A

Raising the levels 2 feet would allow round water access to my pier.

Thank you for your consideration.

Lee Isaacs
[REDACTED]

From: Steve Dycus <[REDACTED]>
Sent: Thursday, December 26, 2019 8:11 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake

We would love to have the lake level in the winter brought up to 462.0 and the flood level dropped to 473. We are all wondering if this is even possible. More than anything we would love the flood level brought down to 473 instead of the 477 that's in place. Thank you. **A**

Thank you,

Steve Dycus RCDD
SR Project Manager

Cell: [REDACTED]
Web: [REDACTED]

Communications | Security | Audio / Visual Systems



From: WMJ <[REDACTED]>
Sent: Sunday, December 29, 2019 10:46 AM
To: ACT-ACR
Subject: [Non-DoD Source] Winter water level raise at Weiss Lake, Alabama

I would like to go on record as opposing the proposed winter water level raise from 6 feet to 3 feet. 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. **A**

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. **B**

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. **C**

In closing I would like to reiterate what I said earlier: Lake Weiss is a flood control lake not a recreation lake. **D**

Thanks for the opportunity to voice my opinion.


December 22, 2019

Commander
U. S. Army Corps of Engineers
Mobile District
Attn: PD-EI (ACT-ACR DSEIS)
P.O. Box 2288
Mobile, AL 36628

Dear Commander:

Re: Draft FS and ISEIS for the Allatoona-Coosa Reallocation Study

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.

A

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.

B

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.

C

With that said, I do have some concerns, questions, and suggestions:

Draft EIS:

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.

D

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.

E

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.

F

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.

G

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.

H

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.

I

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

J

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.

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."

K

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.

L

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 Plate 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.)

M

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

Section 9-02, page 9-2, line 16

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.

N

Sincerely,

Isabella Trussell



Deposition of:
Public Meeting

December 9, 2019

In the Matter of:
Public Meeting

Freedom Court Reporting

877.373.3660 | calendar-al@veritext.com | 205.397.2397

ALLATOONA-COOSA REALLOCATION STUDY

DATE:

December 9, 2019

OPENING STATEMENT:

The time is 4:00 p.m. The public open-house meeting for United States Army Corps of Engineers' (USACE) Allatoona-Coosa reallocation study has begun.

LOCATION:

Acworth Community Center
4361 Cherokee Street
Acworth, Georgia 30101

United States Army Corps of Engineers (USACE) has arranged several informative poster boards to be displayed where property owners and other interested parties may ask questions of the subject matter experts. A sign-in sheet is being used at the door. In addition to asking questions and making oral comments to team members, individuals may request that the court reporter on site record input.

P-143

COMMENTS BY: MIKE BEARDEN

(Exhibit No. 1 was marked for identification.)

A**NOTE: Exhibit 1 was a copy of a December 8, 2019 letter from the Board of the Lake Allatoona Association (Comment ID # NGO-03)****P-144**

COMMENTS BY: THOMAS COOK

"So I guess my opinion is concerning Weiss 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."

A**P-145**

COMMENTS BY: MATT HESTER

"By raising the winter pool to 561, what effect does that have to the number of times the lake gets above 568 and the duration of those events? Thanks."

A

1 CLOSING STATEMENT:

2 The time is 8:00 p.m., and the public open-house
3 meeting for United States Army Corps of Engineers has
4 concluded. Approximately 50 individuals from the area
5 visited after the meeting opened at 4:00 p.m.

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C E R T I F I C A T E

STATE OF GEORGIA)

COUNTY OF GWINNETT)

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the proceedings were reduced to typewriting under my direction and control.

I further certify that the transcript is a true and correct record of the evidence given at the said proceedings.

I further certify that I am neither a relative or employee or attorney or counsel to any of the parties, nor financially or otherwise interested in this matter.

This the 9th day of December 2019.



DIANA FARRELL, CCR, CVR

Georgia Certificate

#4982-0186-7793-2032

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From: Matt Hester <[REDACTED]>
Sent: Sunday, February 16, 2020 9:40 PM
To: ACT-ACR
Cc: Billy Pruitt; Eagle Vending
Subject: [Non-DoD Source] Weiss Lake pool level increase

Commander

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 [REDACTED].

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?

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.

Thanks for your service to our country.

Best Always.

Matt Hester
Matt Hester & Associates
Harry Norman REALTORS



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#1 Ranked Team in Cobb County Sales 2014, 2015, 2016 & 2017





Deposition of:
Transcript of Public Comments

December 10, 2019

In the Matter of:
Public Meeting

Freedom Court Reporting
877.373.3660 | calendar-al@veritext.com | 205.397.2397

1 UNITED STATES ARMY CORPS OF ENGINEERS

2
3 ROME, GEORGIA

4
5
6
7 Transcript of Public Comments to USACE on
8
9 the Draft FR/SEIS; taken before Cathy Cox, Certified
10
11 Court Reporter, commencing at 4:00 p.m., on the 10th
12
13 day of December 2019, at the Forum River Civic
14
15 Center:Berry/Shorter Room, 301 Tribune Street, Rome,
16
17 Georgia.

<p style="text-align: right;">Page 2</p> <p>1 PROCEEDINGS</p> <p>2 [REDACTED]</p> <p>3 Billy Pruitt</p> <p>4 [REDACTED]</p> <p>5 MR. PRUITT: I wasn't trying to be critical.</p> <p>6 I wanted to thank the Alabama Power for the</p> <p>7 program they did a few years ago for looking at</p> <p>8 the levels coming into Weiss Lake and trying to</p> <p>9 design a system so that they can start letting</p> <p>10 the water off early. I like to be positive. You</p> <p>11 know, that's a good thing.</p> <p>12 And I commented to Alabama Power and I told</p> <p>13 them I've been living on the lake. I went to the</p> <p>14 groundbreaking. It was a big thing and all that</p> <p>15 kind of stuff. Some of you people too, I know,</p> <p>16 because it had to be okay.</p> <p>17 But it's been a big thing and I'm 82 and I</p> <p>18 don't want to complain. I want to look at what</p> <p>19 we did and see in the past what we didn't do</p> <p>20 right and make it right. That's why I'm here, A</p> <p>21 you know.</p> <p>22 Anyway, I kind of represent people of my</p> <p>23 age. Me and my wife are 82 and in our area our</p> <p>24 houses are solid -- and we are the young kids.</p> <p>25 The neighbor next door is 92.</p>	<p style="text-align: right;">Page 4</p> <p>1 CERTIFICATE</p> <p>2 STATE OF GEORGIA)</p> <p>3 COUNTY OF PAULDING)</p> <p>4 I hereby certify that the foregoing</p> <p>5 transcript was taken down, as stated in the caption,</p> <p>6 and the proceedings were reduced to typewriting under</p> <p>7 my direction and control.</p> <p>8 I further certify that the transcript is a</p> <p>9 true and correct record of the evidence given at the</p> <p>10 said proceedings.</p> <p>11 I further certify that I am neither a</p> <p>12 relative or employee or attorney or counsel to any of</p> <p>13 the parties, nor financially or otherwise interested</p> <p>14 in this matter.</p> <p>15 This the 12th day of December 2019.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 <i>Cathy M. Cox</i></p> <p>22</p> <p>23 CATHY M. COX, CCR, RPR</p> <p>24 Certificate No. B-441</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 So put this down in your notes. I think it</p> <p>2 would be better if they had come and seen and</p> <p>3 talk to you guys. We all could have helped. We</p> <p>4 have Gadsden State College and a room as big as</p> <p>5 this. And I don't know who decided -- I don't</p> <p>6 know who decided where to have the meetings at,</p> <p>7 and I know they are trying to centrally locate</p> <p>8 it. Folks coming from Mobile ought to do this.</p> <p>9 You need more corporation from the local people.</p> <p>10 You know, like the Chamber and the Commission and</p> <p>11 all that. That's the thing I see to improve. I</p> <p>12 would have one just for the older folks. You</p> <p>13 know, the way to solve a problem is you don't</p> <p>14 cover it up, you just start talking about it.</p> <p>15 I give you my good and bad. That's all I</p> <p>16 see. I came over here to get information and</p> <p>17 talk to people. It's been very informational.</p> <p>18 What I'm trying to do is give what little B</p> <p>19 knowledge that I've gained over the years and</p> <p>20 sharing it. But if nobody wants it, that's fine</p> <p>21 too. I don't have any problem either way.</p> <p>22 (Proceedings concluded.)</p> <p>23 -----</p> <p>24</p> <p>25</p>	

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From: Cathy Pecher <[REDACTED]>
Sent: Monday, December 30, 2019 11:09 AM
To: ACT-ACR
Subject: [Non-DoD Source] Water levels on Logan-Martin Lake

I live at [REDACTED] and would like to support the decision to raise and keep the water level up. 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.

A

Thank you for your consideration

Catherine Pecher

From: Steve Edsall <[REDACTED]>
Sent: Monday, December 30, 2019 10:23 AM
To: ACT-ACR
Subject: [Non-DoD Source] Draft FR/SEIS (Logan Martin Lake)

Commander,

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

A

I recommend implementation of the new winter water levels 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.

B

Thank you for your consideration of my opinion and comments. Please feel free to contact me with any questions concerning my comments.

Steve Edsall
[REDACTED]



Steve Edsall

Vice President - Project Manager Development

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Benton, Skip <[REDACTED]>
Sent: Monday, December 30, 2019 8:00 AM
To: ACT-ACR
Cc: Benton, Skip
Subject: [Non-DoD Source] Draft FR/SEIS

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:

1. allows for the protection of the environmental in drought conditions
2. protects the lake wildlife.
3. allows for better maintenance/control of water levels by Alabama Power Co.
4. improves and/or extends the usage of the Lake for business and pleasure purposes.
5. aesthetically makes the lake more attractive and valuable to those living in the area.

A

I recommend it be enacted at the earliest season possible. If one must wait till Jan 2021 then allow a yearly variance until enacted to begin the process as soon as possible.

B

Should you have any questions please contact me at:

W D Benton
[REDACTED]

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From: Benton, Skip <[REDACTED]>
Sent: Monday, December 30, 2019 8:31 AM
To: ACT-ACR
Cc: Benton, Skip
Subject: [Non-DoD Source] Draft FR/SEIS (Logan Martin Lake)

Commander,

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

A

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.

B

Thank you for your consideration of my comments. Should you have any questions concerning my comments please contact me at:

W.D. Benton
[REDACTED]

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From: Scott O'Neal <[REDACTED]>
Sent: Tuesday, December 31, 2019 1:13 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake weiss

I live on the shore of the lake 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.

Thanks
Scott O'Neal

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

A

From: Clay Wilson <[REDACTED]>
Sent: Tuesday, December 24, 2019 12:54 PM
To: ACT-ACR
Subject: [Non-DoD Source] Lake Logan Martin water level increase

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

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%. 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.

A

In closing, I personally see nothing but good coming from this increase in our lake level. Thanks for listening and Merry Christmas!

From: gmn1216 <[REDACTED]>
Sent: Tuesday, January 14, 2020 12:54 PM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona Lake Water Supply Storage Study
Attachments: Weiss-Logan Martin Relocation Study20200114_11361963.pdf

Please refer to my comments to the Weiss/Logan Martin Water Relocation Study. Thanks. Gary Nuyt.



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 1/14/20

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Gary Last Name: Neyt
Title: NA

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: NA

Preferred Method of Communication

☐ Phone: _____ ☒ Email: [REDACTED]
☐ Mailing
Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input checked="" type="checkbox"/> Flood Storage	<input checked="" type="checkbox"/> Water Management
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input type="checkbox"/> Lake Levels
<input type="checkbox"/> Threatened and Endangered Species	<input type="checkbox"/> Navigation	<input type="checkbox"/> Economic Resources
<input type="checkbox"/> Fisheries	<input type="checkbox"/> Environmental Resources	<input type="checkbox"/> Other
<input type="checkbox"/> Water Quality	<input type="checkbox"/> Recreation	

Geographic Area of Interest

<input type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input checked="" type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

I have lived on Logan Martin lake for 2 years @ [REDACTED]
[REDACTED], Talladega, ALA. 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 adjustments to winter lake levels, I am not
opposed to keeping the lake level @ 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. I do have concerns on how

A

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.

B

Gary Nuyt

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of
Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

From: Adonai's Way <[REDACTED]>
Sent: Monday, January 20, 2020 10:23 PM
To: ACT-ACR
Subject: [Non-DoD Source] Alabama power proposal to raise winter level on Lake Weiss by three feet.

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. **A**

With the damages incurred in December 2015, I wonder if the Corp 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. **B**

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?

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? **C**

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.

thank you for your time.

Gary Wheeler
[REDACTED]

"But of the Son He says, 'YOUR THRONE, O GOD, IS FOREVER AND EVER, AND THE RIGHTEOUS SCEPTER IS THE SCEPTER OF HIS KINGDOM.'"
Hebrews 1:8

Grace and Peace to you in the name of Christ
Gary Wheeler wheelerga@hotmail.com

From: Richard Dean <[REDACTED]>
Sent: Sunday, January 19, 2020 6:03 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comments Regarding Alabama-Coosa-Tallapoosa River Basin
Attachments: img 034043.jpg; img 034042.jpg

Dear sir,

Please see my comments attached. To discuss, please call or email.

Thanks,

Richard Dean
[REDACTED]
[REDACTED]



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: 1-20-2020

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Richard

Last Name: Dean

Title: Area Mgr. ENG/CONST BellSouth - Retired

Organization

☐ Agency (federal, state, or local) ☐ Congressional ☐ Company ☒ General Public

Organization: _____

Preferred Method of Communication

use any

☐ Phone: _____

☒ Email: _____

☐ Mailing Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input checked="" type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input type="checkbox"/> Threatened and Endangered Species	<input type="checkbox"/> Navigation	<input type="checkbox"/> Economic Resources
<input type="checkbox"/> Fisheries	<input type="checkbox"/> Environmental Resources	<input type="checkbox"/> Other
<input type="checkbox"/> Water Quality	<input type="checkbox"/> Recreation	

Geographic Area of Interest

<input type="checkbox"/> Alabama-Coosa-Tallapoosa (ACT) River Basin	<input checked="" type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

I am concerned about the inability of Ala Power Co to control the river level upstream from Gadsden during heavy rain events. I live on Cove Lake about 5 river miles upstream from the bridges at Gadsden. During heavy rain events oftentimes my pier (which is 30" above summer pool) is under water while piers at Southside and Rainbow City have only mud under them.

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.

Thank you,
Richard Dean

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!



Deposition of:
Public Hearing

December 12, 2019

In the Matter of:
Public Meeting

Freedom Court Reporting

877.373.3660 | calendar-al@veritext.com | 205.397.2397

1
2
3
4
5
6 UNITED STATES ARMY CORPS OF ENGINEERS

7 (USACE)

8 Public meeting

9 Childersburg, Alabama
10
11
12
13
14
15

16 Transcript of Public Comments to USACE on
17 the Draft FR/SEIS; taken before Lisa Bailey,
18 Certified Court Reporter, commencing at 4:00 p.m.,
19 on the 12th day of December 2019, at the Friends on
20 Eighth, 109 8th Avenue Southwest, Childersburg,
21 Alabama 35044.
22
23

1 (Proceedings began, 4:00 p.m.)

2 CL LAWRENCE

3 MR. LAWRENCE: I would like the winter
4 level raised on Logan Martin to 462 and improve
5 recreational use. And recreational use to me is
6 fishing, grandkids being pulled around. So that
7 kind of -- it's like -- also, it will improve the
8 fishery for sure. And it would make more stable **A**
9 during the spring spawns and stuff, bringing it up
10 because spring spawn comes early here in Alabama.
11 It pretty well starts in late February. And they
12 don't bring the lake up until after February.
13 Pulled up to 462 I truly believe it would be
14 helpful.

15 The other side effect of the 462 would
16 improve property values on folks in sloughs that
17 run out of water during the winter. There's a five
18 foot difference between summer level and winter **B**
19 level.

20 That's pretty well all I've got. It
21 would benefit our place. We'd all have permanent
22 water.

23 (Proceedings concluded, 7:40 p.m.)

C E R T I F I C A T E

STATE OF ALABAMA)

JEFFERSON COUNTY)

I hereby certify that the above and foregoing deposition was taken down by me in stenotype, and the questions and answers thereto were reduced to computer print under my Supervision, and that the foregoing represents a true and correct transcript of the deposition given by said witness upon said hearing.

I further certify that I am neither of counsel nor of kin to the parties to the action, nor am I in anywise interested in the result of said cause.



Lisa Bailey, CCR #289

CCR #289, Expires 9/30/20

Commissioner for the

State of Alabama at Large

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From: David Freeman <[REDACTED]>
Sent: Thursday, January 23, 2020 3:45 PM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona Lake Water Supply Storage Reallocation Study
Attachments: AllatoonaLakeStorageReallocation-David Freeman.pdf

I have attached a completed comment form regarding this study and my experience and concerns with low water evacuation levels below 'Minnesota Bend' while flooding exists in Gadsden.

Thank you for your consideration of my response.

David Freeman
Member, Neely Henry Lake Association



ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comments Should Be Submitted by January 29, 2020

Information About You

First Name: DAVID Last Name: FREEMAN
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____ ☒ Email: [REDACTED]
☐ Mailing
Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input checked="" type="checkbox"/> Threatened and Endangered Species	<input checked="" type="checkbox"/> Navigation	<input checked="" type="checkbox"/> Economic Resources
<input checked="" type="checkbox"/> Fisheries	<input checked="" type="checkbox"/> Environmental Resources	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	Boating Safety

Geographic Area of Interest

<input checked="" type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

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.

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.

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.

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.

David Freeman

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

From: Meg Wheeler <[REDACTED]>
Sent: Thursday, January 23, 2020 2:49 PM
To: ACT-ACR
Subject: [Non-DoD Source] Winter water level proposed increase - Weiss Lake

To whom it may concern,

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.

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.

Thank you for your attention to this email.

Sincerely,

Margaret Wheeler

Get [Outlook for Android](#)

From: Roben Brasher-Duncan <[REDACTED]>
Sent: Sunday, January 26, 2020 10:24 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin

I would like to see the winter pool 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.

One Question will there be a week(s) that it will decrease for pier repair?

Sincerely,
Roben Duncan

Sent from [Mail](#) for Windows 10

A

B

From: Julie Hennessey <[REDACTED]>
Sent: Sunday, January 26, 2020 9:45 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake level

I am
Requesting that you raise it 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.

A

Sent from my iPhone

From: Ryan Castleberry <[REDACTED]>
Sent: Sunday, January 26, 2020 9:36 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan martin

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. Thanks

A

[Sent from Yahoo Mail for iPhone](#)

From: wayne bucher <[REDACTED]>
Sent: Sunday, January 26, 2020 1:06 PM
To: ACT-ACR
Subject: [Non-DoD Source] proposed change to Logan Martin Lake level management

I have just today become aware of the proposed changes to the rules for managing the level of this lake. We own water-front 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.

A

First, thank you for considering this.

Second - why wasn't there more public awareness made of this? Shorelines Magazine?

B

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'.

C

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.

D

Regards,

Wayne Bucher

From: David Seahorn <[REDACTED]>
Sent: Sunday, January 26, 2020 12:48 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Levels

To Whom It May Concern,

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.

David and Martha Seahorn

[REDACTED]
Pell City, Alabama 35128

[Sent from Yahoo Mail on Android](#)

A

From: Harry Knowles <[REDACTED]>
Sent: Sunday, January 26, 2020 12:46 PM
To: ACT-ACR
Subject: [Non-DoD Source] Plan for winter level of Lake Logan Martin

To whom it may Concern

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.

Thanks for your consideration,
Harry and Carol Knowles

Sent from my iPhone

From: Drew Alexander <[REDACTED]>
Sent: Sunday, January 26, 2020 12:10 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin winter level to 462

I am all for this change, being that I live on this lake, 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.

Thanks,

Drew Alexander

A

From: Bryton Nixon <[REDACTED]>
Sent: Sunday, January 26, 2020 11:59 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake winter pool level

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. 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.

These are just a few of my many points and concerns that I wanted to voice to you guys in hopes that it would help you guys build a case for approval from the USACE.

Thank you,

Bryton Nixon

Newcastle Homes, Inc.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

205-597-3205 (c)

Newcastle-homes.com

From: teterry <[REDACTED]>
Sent: Sunday, January 26, 2020 4:16 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

I favor the proposal to change the winter pool level to 462' provided that it is accomplished without increasing the flood risk. I live on the lake in Lincoln.

A

Tom Terry
[REDACTED]

Sent from my Samsung Galaxy , an AT&T LTE smartphone

From: Thomas Wagner <[REDACTED]>
Sent: Sunday, January 26, 2020 3:26 PM
To: ACT-ACR
Subject: [Non-DoD Source] Draft FR/SEIS (Logan Martin Lake)

Commander,

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.

A

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

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.

Thank you for your consideration of my comments. Should you have any questions concerning my comments please contact me at:

Tom Wagner

218-230-3942

thomas.robert.wagner@gmail.com

From: Bill Ginny Holland <[REDACTED]>
Sent: Sunday, January 26, 2020 2:45 PM
To: Dunn, Tonya N CIV USARMY CESAM (USA); ACT-ACR
Subject: [Non-DoD Source] Re: 30-day comment period extension for the Draft FR/SEIS for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals
Attachments: Draft FR_SEIS - Comment Form.pdf

Hi,

Attached is my Comment Form for the study referenced below. My wife and I fully support the change for the winter water levels for Weiss Lake (see comment form for details).

Regards,

William E and Virginia B Holland

-----Original Message-----

>From: "Dunn, Tonya N CIV USARMY CESAM (USA)" <Tonya.N.Dunn@usace.army.mil>
>Sent: Dec 20, 2019 5:51 PM
>To: Undisclosed recipients;;
>Subject: 30-day comment period extension for the Draft FR/SEIS for the Allatoona Lake Water Supply Storage Reallocation Study and Updates to Weiss and Logan Martin Reservoirs Project Water Control Manuals
>
>To All Interested Parties:
>
>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.
>
>Access the full news release at the following link:
>Blocked<https://go.usa.gov/xpGwx>
>
>
>Thank you,
>Tonya Dunn
>Biologist, Inland Environment Team
>Planning and Environmental Division
>U.S. Army Corps of Engineers, Mobile District
>109 Saint Joseph Street
>Mobile, AL 36602
>Phone: 251.690.2040
>Fax: 251.690.2054
>
>



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: Jan. 26, 2020

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: William

Last Name: Holland

Title: _____

Organization

☐ Agency

(federal, state, or
local)

☐ Congressional

☐ Company

☒ General Public

Organization: _____

Preferred Method of Communication

☒ Phone:

☐ Email:

☐ Mailing

Address: _____

Comment Categories

☐ Water Supply

☐ Cultural Resources

☐ Threatened and
Endangered Species

☐ Fisheries

☐ Water Quality

☐ Flood Storage

☐ Hydropower

☐ Navigation

☐ Environmental
Resources

☐ Recreation

☐ Water Management

☒ Lake Levels

☐ Economic Resources

☐ Other

Geographic Area of Interest

☒ Alabama-Coosa-
Tallapoosa (ACT) River Basin

☐ Tallapoosa Drainage Area

☐ Mobile Bay

☐ Coosa Drainage Area

☐ Oostanaula Drainage Area

☐ Other

☐ Etowah Drainage Area

☐ Alabama River



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comment

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~~ opportunities on the lake. Based on presentations by Corps of Engineers 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.

A

☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

Thank you for helping us to understand what resources in the ACT River Basin are important to you!

From: BENNY THACKERSON <[REDACTED]>
Sent: Sunday, January 26, 2020 7:24 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

Will changing the Alabama Power flood elevation change the flood elevation for FEMA?

A

I am for raising the winter pool elevation and allow for lowering at some interval for pier repair/construction.
Ben Thackerson

B

Sent from my iPhone

From: John Haynes <[REDACTED]>
Sent: Sunday, January 26, 2020 6:41 PM
To: ACT-ACR
Subject: [Non-DoD Source] Change in winter pool level for Logan Martin Lake in AL>

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.

Thanks
John E. Haynes, Jr
[REDACTED]

A

From: Bill Shoemaker <[REDACTED]>
Sent: Sunday, January 26, 2020 5:51 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Plan

The plan appears ok if the summer lake levels 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.

A

Bill Shoemaker

Sent from my iPhone

From: joanna mccabe <[REDACTED]>
Sent: Monday, January 27, 2020 11:04 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake level

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 j u sting on the Lake year round.

This would encourage more waterfront restaurants and a lot of needed resources for the community.

Thanks

Joanna mccabe

Sent from my iPhone

A

From: Anita Bucher <[REDACTED]>
Sent: Monday, January 27, 2020 10:45 AM
To: ACT-ACR
Subject: [Non-DoD Source] Yes on raising winter lake level

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.

A

Thanks for giving us the opportunity to speak into this decision and for all you do to service and maintain Logan Martin

Anita Bucher
[REDACTED]

From: Jimmy Stewart <[REDACTED]>
Sent: Monday, January 27, 2020 8:32 AM
To: ACT-ACR
Cc: Jimmy Stewart
Subject: [Non-DoD Source] in favor of winter water level changing to 462

just wanted to email and let you know I am in favor of raising the level to 462.

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 of 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.

Thanks for your consideration.

Jimmy Stewart
[REDACTED]

From: Lyon Wright <[REDACTED]>
Sent: Monday, January 27, 2020 8:29 AM
To: ACT-ACR
Subject: [Non-DoD Source] COOSA RIVER

Morning.....my name is Lyon Wright, as a land owner in the upper coosa river region (chocolocco creek), i am HIGHLY opposed to raising the lake level...many 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.....

ANY QUESTIONS CALL ME AT [REDACTED]

Lyon Wright

A

From: Josh Vincent <[REDACTED]>
Sent: Monday, January 27, 2020 8:28 PM
To: ACT-ACR
Cc: Lew Watson
Subject: [Non-DoD Source] Logan Martin Lake Water Level

Good evening,

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.

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.

Thank you for the opportunity to voice my concerns.



Joshua B. Vincent
Captain



From: Dale Herring <[REDACTED]>
Sent: Monday, January 27, 2020 5:47 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake level winter pool to 452'

I am for this move. It would be great for Pell City and the surrounding communities. I would be great the recreational activities on the lake.

A

Sent from [Mail](#) for Windows 10

From: Amie Marsh <[REDACTED]>
Sent: Monday, January 27, 2020 2:18 PM
To: ACT-ACR; ACT-ACR
Subject: [Non-DoD Source] Logan Martin Winter Pool Level

To whom it may concern:

We are in favor of increasing the winter pool level. 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!!!

A

Amie and Jamison Marsh
[REDACTED]

Sent from my iPhone

From: Tammy Maddox <[REDACTED]>
Sent: Monday, January 27, 2020 10:41 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake - Water Level Proposal

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.

Respectfully,
Tammy and Ronnie Maddox

Sent from my iPhone

From: Robert Morrison <[REDACTED]>
Sent: Monday, January 27, 2020 9:21 PM
To: ACT-ACR
Subject: [Non-DoD Source] ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY - DRAFT COMMENTS
Attachments: Scan_20200127.png; Scan_20200127 (2).png; Scan_20200127 (3).png; Scan_20200127 (4).png

Attached are my comments concerning the Reallocation Study.

Robert L. Morrison

[REDACTED]

Tel. [REDACTED]
Cell: [REDACTED]
Email: [REDACTED]

US Army Corps
of EngineersALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
AND UPDATES TO THE WEISS AND LOGAN MARTIN
RESERVOIRS PROJECT WATER CONTROL
MANUALSFax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: January 27, 2020 Comments Should Be Submitted by December 30, 2019

Information About You

First Name: ROBERT Last Name: MORRISON

Title: _____

Organization

☐ Agency
(federal, state, or
local) ☐ Congressional ☐ Company ☒ General Public

Organization: _____

Preferred Method of Communication

☐ Phone: _____☒ Email: _____☐ Mailing
Address: _____

Comment Categories

- | | | |
|---|---|---|
| <input type="checkbox"/> Water Supply | <input type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input checked="" type="checkbox"/> Lake Levels |
| <input type="checkbox"/> Threatened and
Endangered Species | <input type="checkbox"/> Navigation | <input type="checkbox"/> Economic Resources |
| <input type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental
Resources | <input type="checkbox"/> Other |
| <input type="checkbox"/> Water Quality | <input checked="" type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|---|---|--|
| <input type="checkbox"/> Alabama-Coosa-
Tallapoosa (ACT) River Basin | <input type="checkbox"/> Coosa Drainage Area | <input checked="" type="checkbox"/> Etowah Drainage Area |
| <input type="checkbox"/> Tallapoosa Drainage Area | <input type="checkbox"/> Oostanaula Drainage Area | <input type="checkbox"/> Alabama River |
| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY

DRAFT FR/SEIS – COMMENT FORM

I am the current owner of the property located at 128 Myrtle Road, Woodstock, GA 30189, originally Lot #75, in the Victoria Cottage Area (VCA) established by the USACE in the early 1950s. My parents acquired the original lease in 1952, and built a cottage there in 1953 on leased land. They later purchased this lot in fee simple from the USACE in the late 1950s or early 1960s, and through gifts and inheritance, I and my Wife are now the sole owners of this property and have lived here full-time since April 1998.

I have been unable to verify the exact dates, but my recollection is that the original summer pool level for Allatoona was 838 feet MSL, later changed I believe in maybe 1957 to its current level of 840 feet MSL. This two foot increase in the summer pool level over time greatly exacerbated the erosive effects on the shore line in the area where my lot is located, and made accessing our floating dock difficult and potentially hazardous. Our house is at or near the highest elevation of any lake-front house in the VCA, and consequently we have one of the steepest access points to the Lake. In the early 1990s I obtained approval and permission to have constructed a seawall on USACE property in front of my house using Keystone block construction. This project covers just a portion of the shoreline abutting my property, and there is a significant gap between where my seawall ends and my next door neighbor's small seawall begins. The top of this seawall was built 2 feet+ above the 840 feet MSL of Allatoona, as required by the USACE. This seawall has been totally successful since its construction in stopping the lake-side erosion in that area it now covers.

We continued to have a steep unprotected area behind the original seawall which was also eroding badly and very difficult for us to traverse to access our floating dock. I again obtained permission from the USACE to construct a secondary block wall with steps behind the present seawall, starting at an elevation of about 842 feet MSL to a maximum height of about 850 feet MSL. Both of the walls were designed to be flooded periodically. The present seawall has so far successfully maintained its integrity at various flood stages, and for the most part, so has the secondary wall. The only damage so far experienced by the secondary wall has been caused by large trees carried by flood waters to shore, and this damage so far has been mostly minimal. The only area of the present seawall that is having a serious problem is on the side where the seawall terminates at the unprotected shoreline. This area from my seawall over to my neighbor's seawall continues to erode, with biggest damage occurring 2 years ago when the landside anchor for my floating dock pulled loose because of erosion. Fortunately, with help from neighbors and friends, we were able to secure the dock with ropes until a new replacement anchoring system could be installed.

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.

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.

B

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.

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, either by extending my current seawall, or using some other method to stabilize that area.

C

Compromise Two: Construct a floating wave barrier, 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.

The following persons share the cove area with me and will be similarly affected by the increase in the Allatoona summer water level:

Mr. Joseph Shorts (Full time resident}
126 Myrtle Rd.
Woodstock, GA 30189

Dr. Ben Wofford (Part time resident}
300/302 Aspen Lane
Woodstock, GA 30189

Ms. Karin Pickens (Full time resident}
130 Myrtle Rd.
Woodstock, GA 30189

Mr. Clarke Cordner (Part time resident}
304 Aspen Lane
Woodstock, GA 30189

Mr. Rance Jiles (Full time resident}
129 Myrtle Rd.
Woodstock, GA 30189

ADDENDUM: 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 are 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.

I have been a member, Chairman and acting General Manager of the Lake Allatoona Preservation Authority (LAPA), a tri-county agency of the State of Georgia until it ceased operations in 2016. As Chairman of LAPA, I was invited by the USACE to participate as a presenter in a seminar in 2009 sponsored by the USACE at the National Academy of Sciences in Washington, DC on issues specific to Allatoona and concerning the ACT and ACF river basins water issues. I was a board member for 16 years of the Cherokee County Water & Sewerage Authority, a 100,000+ customer governmental utility which withdraws its water from the Etowah River above Allatoona, and discharges treated wastewater into Allatoona. My entire professional career included being engaged as a public finance investment banker and/or Municipal Advisor in over \$10 billion of capital funding for public works projects in seven southeastern States, a large number of which were for municipally owned water and sewer utilities. Allatoona is the most imposing and important geographical feature of Bartow, Cobb and Cherokee counties in Georgia, and has a major economic impact. Any and everything that can be done to protect Allatoona should be done.

From: Carroll Watson <[REDACTED]>
Sent: Monday, January 27, 2020 8:57 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Supporter

I live on the lake and totally support the proposal to raise the winter water levels and other changes.

A

My environmental fiends tell me that it will also reduce the CO2 level as the decaying vegetation gives off the gas. So less decaying vegetation..

B

Lew Watson
[REDACTED]

From: Ray, John <[REDACTED]>
Sent: Tuesday, January 28, 2020 9:37 AM
To: ACT-ACR
Subject: [Non-DoD Source] Pubic comments

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". 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. Chief Investigator John C. Ray

A

B

From: Jason Kauffman <[REDACTED]> on behalf of Jason Kauffman
<[REDACTED]>
Sent: Tuesday, January 28, 2020 9:18 AM
To: ACT-ACR
Subject: [Non-DoD Source] Supporting Logan Martin Lake Changes in Lake Level

Dear Corps of Engineers,

We are in support of the lake level changes raising the winter pool up 2 feet, 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.

A

Thank you for your time,

Jason Kauffman
Lincoln Harbor on Logan Martin Lake

[REDACTED]

From: [REDACTED]
Sent: Tuesday, January 28, 2020 8:01 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Winter level

My name is Clif Wakefield and I live in the Lands End Subdivision just south of the I-20 bridge. I have been working with Alabama Fish 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.

Clif Wakefield
[REDACTED]

A

[REDACTED]

From: Kelly Whisenant <[REDACTED]>
Sent: Tuesday, January 28, 2020 12:46 PM
To: ACT-ACR
Subject: [Non-DoD Source] water storage reallocation study
Attachments: whis.pdf

To Whom it may concern:

I am attaching a form with my concerns regarding the changes you are considering. I am one of the owners of Godfrey's marina located on the Neely Henry Basin and have a lot of concerned renters and neighbors. I have collected their forms and will be emailing them to you today and tomorrow. I will also mail the hard copies post dated today or tomorrow as I understand they must be submitted by the 29th. Thank you for allowing us a chance to voice our concerns.

Sincerely,
Kelly Whisenant
Godfrey's Marina
256.441.7410

--

Kelly Whisenant
Comptroller
Main Office Building
[REDACTED] Voice & Fax
[REDACTED]





US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comments Should Be Submitted by January 29, 2020

Information About You

First Name: Kelly Last Name: Whisenant
Title: owner of Godfrey's Marina - Neely Henry Basin

Organization

☐ Agency ☐ Congressional ☒ Company ☐ General Public
(federal, state, or local)

Organization: Godfrey's Marina

Preferred Method of Communication

☒ Phone: [REDACTED] ☐ Email: _____
☐ Mailing Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input checked="" type="checkbox"/> Threatened and Endangered Species	<input checked="" type="checkbox"/> Navigation	<input checked="" type="checkbox"/> Economic Resources
<input checked="" type="checkbox"/> Fisheries	<input checked="" type="checkbox"/> Environmental Resources	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	Boating Safety

Geographic Area of Interest

<input checked="" type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



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DRAFT FR/SEIS - COMMENT FORM

Comment

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.

A

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.

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.

☒ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

additional comments attached

To: US Army Corps of Engineers

Additional Comment:

As one of the owners of Godfrey's Marina, Neely Henry Basin, I am very concerned about the Possible changes in the Coosa River Water control. We have a 40-slip boathouse full of renters That would not be able to get their boats out should the water be lowered during times of heavy rains. As you can imagine, this would ruin our business.

We are currently in the process of applying for a permit with Alabama Power to add slips to our boathouse. The \$3000 application has been paid and is in the process of being sent to you, the Corps of Engineers for review. The decision you make regarding these changes will weigh heavily in our decision to proceed with the addition.

Please consider the impact your decision will have on our business as well as the many other businesses in our area. It is our hope that you do NOT approve Alabama Power's request to make these changes.

Sincerely,

Kelly Whisenant
Godfrey's Marina

B

From: GLEN LONG <[REDACTED]>
Sent: Tuesday, January 28, 2020 11:42 AM
To: ACT-ACR
Subject: [Non-DoD Source] Comments on Draft FR/SEis

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.

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.

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.

Thank you

Glen Long P.E.

From: Cathy Harris <[REDACTED]>
Sent: Tuesday, January 28, 2020 1:58 PM
To: ACT-ACR
Subject: [Non-DoD Source] Supporting Logan Martin Lake Changes

I support changes to the lake level!!

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.

Cathy Harris
[REDACTED]

A

From: [REDACTED]
Sent: Tuesday, January 28, 2020 2:15 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

ATTN: Commander, USACE, Mobile District
PD-EI (ACT-ACR DSEIS)

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 accessable 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.

Wayne Snow
Lincoln , Al

[REDACTED]

From: Candy Stewart <[REDACTED]>
Sent: Tuesday, January 28, 2020 9:20 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin winter water level 462'

Hi - I wanted to email to let you know I am in favor of raising Logan Martin's winter pool to 462'.

I believe property values would increase and that would make it easier for home sales by people being able to enjoy water year round and having a "lake view". When we sold our house on the lake a few years ago, the agent said do not list it until May when the water rises. She told us we would get more money than if we sold it when lake levels were low. When we bought our current house, the price decreased by \$100,000.00 because they knew the water was going down and it would more difficult then. Also, I think it would provide an economic boost for Pell City businesses, restaurants, etc.

Candy Stewart
[REDACTED]

A

From: hawkbranchhorses . <[REDACTED]>
Sent: Wednesday, January 29, 2020 8:50 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake level winter pool.

Highly in favor of level of winter pool being increased. Would be of great value to residents and recreational users.

A

From: Charles McDowell <[REDACTED]>
Sent: Wednesday, January 29, 2020 9:59 AM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake Winter Level

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.

Charles McDowell
PE retired

A

From: Cliff TITLEIST <[REDACTED]>
Sent: Wednesday, January 29, 2020 9:32 AM
To: ACT-ACR
Subject: [Non-DoD Source] water level at Logan Martin

I support the proposed change in winter water level...i'm sure this will have a positive effect on fishing and boating in the area... Cliff White... [REDACTED].....

A

From: Pat Hutchens <[REDACTED]>
Sent: Wednesday, January 29, 2020 11:53 AM
To: ACT-ACR
Subject: [Non-DoD Source] Allatoona Lake Water Storage.
Attachments: Doc 01-28-2020 19-37-15.pdf; Doc 01-28-2020 19-38-50.pdf

Good Morning,

I am a former resident of Canton, Ga and a current resident of Ohatchee Alabama. Formerly I lived within 5 minutes of Lake Allatoona and now live on Neely Henry Lake. I understand and have heard both sides of the water issue. When I lived in Georgia, I was fully aware of the population growth. However there are other ways to have water reservation and conservation. I also am a former biology teacher of 42 years and am fully aware of all the conservation and environmental issues associated with the reduction of water in Neely Henry Lake. Bald eagles were brought into this area to try to increase numbers. Less than a half a mile from my home is a nest of eagles which I see frequently flying over the lake to fish. This is one of their main diet essentials. We must have balance in our environment. To hoard water in one area and prevent the natural flow to another area I feel, is irresponsible let alone the consequence of flooding issues, the impact on the environment and the economy associated with this issue. A

Water is now considered the new "gold". Water wars will continue just take a look at the state of California.

I am asking that you look carefully into this issue. Georgia isn't the only state that needs and wants water, and I am asking that you all will be fair to all. Attached you will find my form request.

Thank you,
And always supporting,

Pat Hutchens



US Army Corps
of Engineers
Mobile District

ALLATOONA LAKE WATER SUPPLY STORAGE
REALLOCATION STUDY
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RESERVOIRS PROJECT WATER CONTROL
MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Comments Should Be Submitted by January 29, 2020

Information About You

First Name: Patricia Last Name: Hutchens
Title: _____

Organization

☐ Agency ☐ Congressional ☐ Company ☒ General Public
(federal, state, or
local)

Organization: _____

Preferred Method of Communication

☐ Phone: _____ ☒ Email: _____
☒ Mailing
Address: _____

Comment Categories

<input type="checkbox"/> Water Supply	<input type="checkbox"/> Flood Storage	<input type="checkbox"/> Water Management
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Hydropower	<input checked="" type="checkbox"/> Lake Levels
<input checked="" type="checkbox"/> Threatened and Endangered Species	<input checked="" type="checkbox"/> Navigation	<input checked="" type="checkbox"/> Economic Resources
<input checked="" type="checkbox"/> Fisheries	<input checked="" type="checkbox"/> Environmental Resources	<input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/> Water Quality	<input checked="" type="checkbox"/> Recreation	Boating Safety

Geographic Area of Interest

<input checked="" type="checkbox"/> Alabama-Coosa- Tallapoosa (ACT) River Basin	<input type="checkbox"/> Coosa Drainage Area	<input type="checkbox"/> Etowah Drainage Area
<input type="checkbox"/> Tallapoosa Drainage Area	<input type="checkbox"/> Oostanaula Drainage Area	<input type="checkbox"/> Alabama River
<input type="checkbox"/> Mobile Bay	<input type="checkbox"/> Other	



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DRAFT FR/SEIS - COMMENT FORM

Comment

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☐ Attach additional sheets of paper if you need more space for comments

Specific questions may be directed to Mr. Mike Malsom, Inland Environment Team, U.S. Army Corps of Engineers, Mobile District, Planning and Environmental Division, (251) 690-2023

From: Dean Bourne <[REDACTED]>
Sent: Wednesday, January 29, 2020 3:53 PM
To: ACT-ACR
Subject: [Non-DoD Source] Comments for Allatoona Lake Water Supply Storage
Attachments: scan0033.pdf

Thank you for extending and accepting our comments.

Thank You!
Dean Bourne
Marietta Marine Inc.

[REDACTED]



US Army Corps
of Engineers

ALLATOONA LAKE WATER SUPPLY STORAGE REALLOCATION STUDY AND UPDATES TO THE WEISS AND LOGAN MARTIN RESERVOIRS PROJECT WATER CONTROL MANUALS

Fax or email comments to:
(205) 930-5707 or
ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

Date: _____

Comments Should Be Submitted by December 30, 2019

Information About You

First Name: Dem Last Name: Bourne

Title: Owner

Organization

☐ Agency ☐ Congressional ☒ Company ☐ General Public
(federal, state, or
local)

Organization: Marietta Marine Inc

Preferred Method of Communication

☐ Phone: _____ ☒ Email: [REDACTED]
☐ Mailing
Address: _____

Comment Categories

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Water Supply | <input checked="" type="checkbox"/> Flood Storage | <input type="checkbox"/> Water Management |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydropower | <input checked="" type="checkbox"/> Lake Levels |
| <input type="checkbox"/> Threatened and
Endangered Species | <input type="checkbox"/> Navigation | <input checked="" type="checkbox"/> Economic Resources |
| <input checked="" type="checkbox"/> Fisheries | <input type="checkbox"/> Environmental
Resources | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Water Quality | <input checked="" type="checkbox"/> Recreation | |

Geographic Area of Interest

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Alabama-Coosa-
Tallapoosa (ACT) River Basin | <input type="checkbox"/> Coosa Drainage Area | <input type="checkbox"/> Etowah Drainage Area |
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| <input type="checkbox"/> Mobile Bay | <input type="checkbox"/> Other | |



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ACT-ACR@usace.army.mil

DRAFT FR/SEIS - COMMENT FORM

As a Business Owner I endorse the items Mike Bearden has suggested. The reason is the economic value Allatoona brings to my business From Fishing to Boating.

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 points...thus somewhat restricting late summer hydropower releases during low inflow periods.

A

B. Modify Allatoona recreational impact assessments to recognize that adverse summer season recreational impacts begin at 840 (841) water levels.

B

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.

C

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 options...and to reanalyze water level drawdowns to model changes that would result from changes as a result of changes A-C above.

D

I do not like the idea of allowing The State of Georgia to pull water out for other regions thus possibly lowering the Lake levels depriving my region from the economic benefit from the Lake.

E

Please give us more water in February, March, October and November.
Please leave our levels normal pool in April, May, June, July, August and September.

F

December 15th thru January 15th winter levels are ok.

Thank You!
Dean Bourne
Marietta Marine Inc.
[REDACTED]

From: Carl Wyatt <[REDACTED]>
Sent: Wednesday, January 29, 2020 10:26 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake water level modifications
Attachments: Letter to corp of engineers 012820.docx

January 29, 2020,

To Whom it May Concern:

We are requesting the Corp. of Engineers and Alabama Power Company allow the water level remain at 462 ft. during the winter months, November to April, each year. Four of our neighbors are in the same situation and cannot remove their boats from their docks after November until the water rises again above the 462 foot level.

We own property on Logan Martin Lake approximately 1.5 Miles above Logan Martin Dam, in Talladega County. Our property includes two boat docks where we park our two bass boats and a pontoon boat. During the winter months November to April, when the water level is lowered to winter pool, we are unable to use our boats due to the water being so shallow that our boat lifts touch ground before the boat is low enough in the water to come off the boat lift. If the water level were raised 2 feet it would allow us to use our boats year around. . Four of our neighbors are in the same situation and cannot remove their boats from their docks after November until the water rises again above the 462 foot level.

One of our neighbors who lives in Marietta, Georgia and whose husband is an invalid, was unable to remove her boat during the flood, last February 2019. As a result, her pontoon boat was damaged considerably and the insurance company refused to make repairs to it. Had she been able to remove her boat during her visit in December 2018, she could have avoided the damage.

Any consideration in favor of modifying the water level would be greatly appreciated.

Respectfully,

Linda Kay Jones

Linda Kay Jones

[REDACTED]

[REDACTED]

A

From: [REDACTED]
Sent: Wednesday, January 29, 2020 6:20 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Lake

To: ACT-ACR

To Whom It May Concern:

As a resident and frequent boater on Logan Martin Lake, I would like to request that the Winter level be raised from 460 feet to 462 feet in order to allow us to use our boat(s) during the winter months. **A**

Thank you for your consideration of this request.
Martha Tucker

From: Roy <[REDACTED]>
Sent: Thursday, January 30, 2020 8:36 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin lake level must be raised. The life on the lake will be greatly enhanced and the health of the wildlife will prosper as never before. Please give us the water we so desperately need. Thank you. Roy Flannagan, a lake residen...

A

Sent from my iPhone

From: Marty W Fowler Sr. <[REDACTED]>
Sent: Friday, January 31, 2020 6:20 PM
To: ACT-ACR
Subject: [Non-DoD Source] Logan Martin Winter Pool

I strongly oppose raising the winter pool level. Show the residents that your additional release volume and timing work before before risking floods. If the Damns above us can control flooding within a few feet based on their winter levels, please do the same.

A

Yes, I am aware that Logan Martin has a twelve foot flood variance.

Concerned citizen!
Thank you,

Sent from my iPad

From: [REDACTED] michael [REDACTED]
Sent: Sunday, February 16, 2020 10:57 AM
To: ACT-ACR
Subject: [Non-DoD Source] Winter lake level. Don't raise the level. Look at the last 2 years

A

Sent from my LG Mobile

From: Sarita Workman <[REDACTED]>
Sent: Tuesday, February 11, 2020 9:37 AM
To: ACT-ACR
Subject: [Non-DoD Source] Lake Weiss

Good morning,

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.

Thank you,



Sarita B. Workman
Store Manager



Follow us on:



From: Pam Powell <[REDACTED]>
Sent: Sunday, February 16, 2020 1:03 PM
To: ACT-ACR
Subject: [Non-DoD Source] County Road 1008

If this is going to continue then someone needs to fix the road so that we can still get in. The land did not flood but the only road in has and the people that live there full time had to evacuate for weeks. This is not fair. If and when it gets to the point of cutting power then you all can send an email or text or something so we can choose to evacuate or stay. Please take this into consideration. By the time the water has got to the top of some of the campers our neighbor had to go in by John boats to secure their belongings.

Pam Powell

Sent from my iPhone

Pam Powell
Safety Manager

[REDACTED]

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From: Chad Holder <[REDACTED]>
Sent: Wednesday, February 12, 2020 11:28 PM
To: ACT-ACR
Subject: [Non-DoD Source] Raising lake Weiss Winter levels.

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 years 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 there 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 lesson 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..

Sent from my iPhone

A

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