APPENDIX K

Scoping Comments by Issue Area

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
Water Resource	Public Water Supply	• The Corps Hydrologic Engineering Center should conduct water supply analyses to manage the Alabama-Coosa-Tallapoosa Watershed in a way to limit water shortages and lessen the impacts of long-term droughts in the Etowah Basin. The Corps should determine the Basin's limit for annual water supply and how water levels in the Lake might be affected by new reservoirs and an overabundance of new wells in the basin, and how climate change forecasting can be used to assess the future of the lake water inflow. • The Corps-sponsored, ongoing Lake Allatoona/Upper Etowah study measuring the overall health of the Upper Etowah has fundamental flaws that make it insufficient alone to make water supply decisions for Lake Allatoona and the Upper Etowah. The stakeholders in the Etowah Drainage Basin represent groups with conflicting agendas. Given that household water use pales in comparison to what farmers, electric utilities and factories need to supply households with goods and services, all stakeholders need to present their case to determine the real cost of water. • Although the original purposes of the Lake Allatoona dam were flood control and power, there must be a compromise between the original purposes, commercial needs and most importantly a steady supply of drinking water. The Corps should consider all these factors as they allocate water for different purposes. Water is a limited resource that must be shared by all in the basin. • Water control manual should address Municipal Water Supply needs of the Etowah Basin. • Concern was expressed that the City of Atlanta is taking too much water out of the Coosa basin, thus reducing the quality and quantity of water that is required to sustain the lake, and that Atlanta should look for other resources for their drinking water. A recent journal article, about four years ago, indicated that the average municipality wastes between fifteen to seventeen percent of the water that they receive. The article stated that Atlanta wastes sixty percent of theirs. If Atlanta can fix their problem, they wouldn't need as much water from the Coosa basin. • Concern that the Oostanaula and the Etowah Rivers always have enough minimum flow to allow good quality and quantity of water for the Rome drinking water treatment plant for the people of the area, and also that we have enough water in the streams to assimilate the waste water that we produce here in Rome. As they are

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		considering water quality and quantity, the Corps should also ensure that flood control is given a high priority. • Corps must analyze affects of manual revisions on water availability in Coosa and Tallapoosa Basins. Decisions to modify water supply allocations in Coosa River basin will stretch into other river basins, particularly the Chattahoochee Basin, due to larger interbasin transfers of water between Coosa and Chattahoochee. • The Corps of Engineers number one consideration for operating Allatoona Dam, as well as issuing 404 water withdrawal permits in the Upper Etowah, should be to allocate storage and flow for a viable Lake Allatoona. If this is done, the Lake will continue to serve drinking water and recreational use. If a healthy lake requires higher cost for land development, private docks, marina and boat concessions, and hydroelectric power storage and power generation, then that's as it should be. It is also preferable to a situation where private corporations are supplying U.S. citizens their drinking water. The Corps' Water Supply budget is miniscule even though its Civil Works Fund claims the Corps is transforming to meet the Nation's needs. The budget does not reflect the Corps' goal to prioritize the needs of a national water supply crisis, which is a big one here in the Southeast. The Corps can lead with strategic goals that insure the dam they operate is on a healthy Lake. A dam is no use to anyone on a dried up, polluted Lake.
	Storage Allocations	• The recent Water Supply and Water Conservation Management Plan adopted by the Metropolitan North Georgia Water Planning District calls for additional reliance on Lake Allatoona as a source of water supply. The ACT WCM NEPA process should evaluate a potential reallocation of storage and increased use of Lake Allatoona as a water supply source consistent the duly adopted and approved plan. The Corps should consider other potential mechanisms to increase the yield of Lake Allatoona, for example, an analysis of potential to the seasonal draw-down of the lake. The Corps should also analyze other possible rule curve changes at the federal projects. • The Corps of Engineers number one consideration for operating Allatoona Dam, as well as issuing 404 water withdrawal permits in the Upper Etowah, should be to allocate storage and flow for a viable Lake Allatoona. If this is done, the Lake will continue to serve drinking water supply and recreational use. If a healthy lake requires higher cost for land development, private docks, marina and boat concessions, and hydroelectric power storage and power generation, then that's as it should be. It is also preferable to a situation where private corporations are supplying U.S. citizens their drinking water. The Corps can lead with strategic goals that insure the dam they

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Issues Identified		Comments
		operate is on a healthy Lake. A dam is no use to anyone on a dried up, polluted Lake. • The U.S. Army Corps of Engineers needs to execute the commitments in its "Environmental Operating Principles" by providing more water supply storage in Lake Allatoona, including converting storage used for other purposes. The Corps needs to determine the Lake's actual storage capacity today and how much space has been lost to Upper Etowah River sediment deposits, where vast grasslands grow in the riverbed near Knox Bridge during drought. The Corps also needs to determine how much more storage capacity has been lost along the shoreline from sediment runoff over the Corps property's narrow buffer caused by poor, adjacent site development. The Corps states its principles are consistent with the National Environmental Policy Act, the Army Strategy for the Environment with its emphasis on sustainability and the triple bottom line of mission, environment and community, other environmental statutes, and the Water Resources Development Acts that govern Corps activities. Lake Allatoona already exceeds Georgia EPD pollution limits and is further threatened if more water is released from the Dam, its level is reduced by upstream reservoirs, or its water pumped to other watersheds. • The Corps should consider growth-inducing impacts to the ACT basin of proposed water allocations out of Lake Allatoona.
	Lake Levels	• Lake Allatoona water level should not be lowered to the winter pool it has been in the past. We have been fortunate this year that we had adequate rains; next year we may not be so lucky. The Corps needs to be proactive regarding any future deficit. In the event of flooding rains, the dam can be opened to change water flow as needed. This lake is an important asset to the Cobb/Paulding/Cherokee area for water, etc. Although less important, thousands of people use this lake for local recreation which is needed now more than ever. • Allatoona lake level is of the utmost importance in preserving the quality and quantity of our water and also aides in the decrease of shoreline erosion. Maintaining a more consistent water level will ensure that these will remain constant for generations to come. • The Corps should keep the Allatoona Lake levels as high as possible during the fall and winter months. • Lake Allatoona Water level should be kept a few feet higher later into the year. Currently, the water is drained

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		too early, in and around September, where it would be better if it was drained later in October. This would leave more drinking water in Lake Allatoona longer. Leaving more water in the lake later in the year, it may also have a positive impact on business' that are centered around Lake Allatoona, allowing them to generate income later into the year. • The Corps should keep Lake Allatoona water levels higher later into the year. Why does the Corp start lowering Lake Allatoona right after July 4th? Some years by Labor Day the lake is so low that boating is dangerous. Not accounting for this years' drought, if there is water for drinking and no chance of a flood why couldn't Lake Allatoona be left higher longer? • The Corps should carefully consider flooding potential at Rome if the winter pool level is raised, but ensure that minimum flows are maintained for water supply and waste water treatment. • The Corps should reconsider the need for drawing down Weiss Late in the winter. With all the modern weather forecasting, why not leave the lakes full pool or almost full pool year round, and only drop lake levels when necessary for incoming rains? Then when the rains don't come in the spring - we will have some water in our lakes. • Neely-Henry Lake waters should be maintained at the 507 to 508 foot elevation year-round. • The Corps should investigate winter pool elevations to minimize drought impacts on water supply.
	Drought	• Concern was expressed about the policies used by the Corps to manage the lake level in Lake Allatoona throughout the year. The Corps needs to have a more effective approach to keep the lake levels higher during times of drought, which means they cannot let water through the dam just because it was committed to 45 yrs ago. The Corps' water management policy has to consider the level of drought in Georgia in a dynamic manner. • With the drought we have experienced over the past several years, it seems to make sense to increase the lake levels throughout the year. When the availability of drinking water supplies are in question, the Corps should provide as much cushion as possible by keeping the lake at as high a level as we can. I understand that the Corps

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		is required to release a certain amount from Lake Allatoona, but if the level was higher throughout the year, there would be more of a cushion for drought situations, recreation, and water quality. • The Corps should consider a more "trigger" driven approach to management of lakes during severe low flow events; triggers that would incrementally reduce outflow sooner than were activated last year. Allatoona was only held to minimum outflows when water supply was already threatened. Recreational use of the lake had been lost months before.
	Impact Assessment	• When weighing the various demands on the water resources under control of the Corps, the Corps needs to keep in mind that their decisions impact communities well beyond the boundaries of the basin itself. Water and power may still be supplied with a multitude of local entities but those entities become more tied together with each passing year. Restricting water allocations to a supplier at Lake Allatoona can affect water suppliers several counties away. This happens throughout the basin and the needs of all concerned should be weighed.
Water Resources	Water Quality	• The primary goal of the Corps WCM program should be to attain the very best possible water quality. • The Corps is well aware of the importance of maintaining good water quality standards to benefit wildlife, as well as all water users. Regardless of the water management plan adopted for the ACT basin, the Corps should monitor and meet all State water quality standards for at least "Fish and Wildlife" classified waters. • Water quality of Lake Allatoona and Carters Lake should be addressed.
	Water Levels	• The Corps should consider keeping the water levels in Lake Allatoona up to or near the 840 level. The studies presented at some LAPA meetings make it clear that the lower the water level the worse the quality of the water is. • The Lake Allatoona level must be kept at a higher level in both the summer and winter to reduce the damage to the bank and to reduce the negative impact due to the concentration of pollutants during the winter drawdown. The Corps does not adhere to the Rule Curve either during years of above average rainfall or during years of below average rainfall; there doesn't seem to be any logic in this.

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Issues Identified		Comments
		• The LAA feels that lake level is of the utmost importance in preserving the quality of our water and also aides in the decrease of shoreline erosion. Maintaining a more consistent water level will ensure that these resources will remain constant for generations to come. • The Corps needs to be particularly concerned with water level in Lake Allatoona, as it affects water quality and recreation. Realizing the Allatoona dam has a primary function for downstream flood control, there needs to be a review of the historical data to allow for better management of the lake levels. Their two primary focal points should be the lowest lake level required and the timing/curve of the release of water. Regarding the first point - the minimum level required for Allatoona seems substantially lower than that required for flood control. There needs to be a re-evaluation of this lake level minimum to see if this limit could be raised (increased). This would help the lake in the areas of pollution (higher volume of water for dilution and disbursement), recreation - higher water levels during off peak season, while maintaining safe flood control based on historical data and lake level limits. The second point is the timing of the releases (the curve). Based on historical weather patterns the Corps now has data to determine the wet seasons and more accurately depict when the lake needs to be at its lowest point. If the curve could be adjusted to keep the water levels higher for periods later in the year, there would be benefits to water quality (pollution levels) and recreation, with the added benefit of drought remediation or protection. • Lake Allatoona water levels should be kept high for the benefit of many of the primary resource categories. Raising and lowering the lake taxes the water quality, the surrounding agriculture and animal/fish population, not to mention navigation and hydropower. The only time the lake level should change is during periods of heavy rain (lower levels for flood control) or drought (high levels to maintain stability of lake). • There is concern about both water quality and water level on Lake Allatoona from residents of Victoria Cottages at Owl Creek. Children are swimming in water which at times can be seen running down the side of the hill from the streets above and flowing directly into the lake. Also, the shore line is eroding quickly away. Property values also go down with the reduced water level ; no one wants a dock sitting on dry land. Residents would like to see the water level raised and not taken down so low each fall.

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Issues Identified		Comments
		• Water quality is a major issue to many people of the area of Lake Allatoona. They think that lake levels in Allatoona should be more stabilized to keep the quality up for drinking water and recreation. • Keep the lake level as high as possible during the fall & winter months. • The Corps should increase the lake level for Allatoona to improve the quality and increase the quantity of water in the lake. • It has become obvious to everyone that Lake Allatoona has been lowered far more than necessary in the winter and that there is no reason to lower it to 823 feet, a drop to 830 is more than sufficient for Flood Control. It is well documented that there is sufficient advanced weather information that would allow the lake to be dropped (for Flood Control) in case of impending storms. Also note that lowering the Lake to 823 feet causes a great deal of erosion to the banks of the lake and therefore causes more silt to build up on the bottom of the lake. Another problem caused by lowering of the lake is that it allows several different major chemical problems to greatly increase as a direct result of the lower level. Please consider stopping the level at 830 feet for all around lake health. • The Corps should consider keeping the lake level of Lake Allatoona at 830 feet in the winter as opposed to the 823 that is the present level. It is quite obvious that there is no reason to lower the lake to this level and doing so is to the detriment of the lake. When the lake is lowered to this level it causes considerable erosion to the lake and also allows dangerous chemical levels to build up and cause serious danger to the Lake itself. Please consider making the 830 mark the best winter level for Lake Allatoona. • The Corps needs to maintain higher water levels to keep Lake Allatoona cleaner - no ability exists to control storm water runoff so higher water levels allow for more diversification. • Lake levels produce a direct impact on water quality and foster a positive get involved attitude that is far reaching beyond just admiration for Allatoona.

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
	Nutrient & Sediment Loading	• The Upper Etowah Basin Alliance is pleased that the Corps is initiating the update of the Water Control Plan and EIS, which in their opinion has been needed since 1990. Please be sure to carefully factor in sediment and nutrient loadings to Lake Allatoona from: urban activities, sediment loading reductions on volume of storage, sudden fluctuations in elevation of water at the lake that worsen the lake shoreline erosion, and faulty septic tank/ leach fields adjacent or on USACE properties at Lake Allatoona. They are pleased to offer their assistance to the Corps and Mobile District staff on this very important effort. • The effect of reservoir operations on water quality should be addressed in the WCM update, including: existing and potential effects to dissolved oxygen, temperature, pH, conductivity, nutrient and organic material dynamics, and various industrial and municipal discharges. A monitoring program addressing water quality in reservoirs and tail waters should be designed and implemented to detect, report, and mitigate water quality issues that may impact benthic and pelagic species. • Polluting of Lake Allatoona and the affects that this has on Atlanta's Northern Suburbs and downstream are areas of deep concern. The basin/ Region must have a comprehensive plan. It would be sad if we were in a state water war issue such as what is going on with Georgia, Alabama, and Florida over Lake Lanier water. What is the Corps doing to prevent this from happening?
	Development	• The quality of the water in Lake Allatoona is of extreme concern and it seems that the development around the lake is growing at an alarming rate. The county commissioners in Cobb do not seem to consider the impact to the lake when making zoning decisions. The Corp of Engineers should be able to take a stand in opposition to development, particularly when the property in question is adjacent to Corp property. The county should be required to meet with the Corp to discuss the possible impact to the lake and the quality of our drinking water as they make growth decisions. • The Corps should consider the impacts of development on lakes as an area of concern for lake water quality; supporting development was the intention when the lake was established. This opportunity to comment on the outdated regulations policy of lake management is appreciated.

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
	Flow Levels	• The City of Rome is concerned that there will always be at least the minimum flow in the Oostanaula and the Etowah Rivers to allow us sufficient quantity and quality of water for our drinking water treatment plant for the people of the area. There is also a concern that there is enough water in the streams to assimilate the waste water that is produced in Rome. The other concern we have is flood control. So we just want to emphasize, in considering water quality and quantity, that flood control is given a high priority. • The quality of the water coming down to Gadsden from the upper Coosa is a major concern; it is not as good as it has been in the past. Another major concern is that the quantity of water coming from the upper Coosa to Gadsden is not what it used to be either. The flows are much lower. If conditions continue, the quality of our water is going to continue to decline. • Last year, during the drought, water quality Neely Henry Lake was diminished greatly. Diversion of water in Georgia is of concern to the Neely Henry Lake Association and we are fearful that water quality will decline if that continues to take place.
	Flood Damage Reduction	• Current flood control operations must be revised to reflect the 50 years of basin alterations that have occurred since the original design of the flood control operations. Economic analysis of flood control operations must reflect the established levee system in the vicinity of Rome, Ga. There must be established priority for releases, only releases for authorized purposes or releases that have been approved through legislative actions should drive the decision process. • Economic analysis of flood control operations must reflect the established levee system in the vicinity of Rome, Ga. There must be established priority for releases. Only releases for authorized purposes or releases that have been approved through legislative actions should drive the decision process.
Economic Resources	Economic Resources	• The Corps needs to seriously consider raising the lake Allatoona winter pool by at least 4 feet. This was agreed upon by the Corps in 2004 with input from LAPA and GA EPO. A major hurricane event in November 2004 caused flooding at the Alabama border, especially in Rome. The idea of raising levels for winter pool was abandoned after this event. The fact that Lake Allatoona was 4' higher than normal had absolutely no connection to high water levels in Rome. Rain over the whole ACT basin was responsible for the flooding, not the decision to keep

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Issues Identified		Comments
		Allatoona 4 feet higher going into the winter. Lake Allatoona exists for flood control first, drinking water and recreation second. However, both uses can co-exist. Additionally, with the influx of sediment into the lake, and especially the weathering effect on the bare red clay banks during low winter pool, the lake will continue to be a muddy mess in the spring. Increasing lake levels during the winter months will provide better year round water quality, earlier recreation use in the spring, and increased volumes for other above uses, as well as drinking water. There appears to be a little or no "downside" in keeping the lake slightly higher during the winter months. • The Corps needs to consider flood potential of Rome if the winter pool is raised. We realize it's going to be quite an undertaking, as it always has been, to regulate the pool in the Allatoona and Carters so that the people downstream are protected from floods and yet they still have an adequate water supply. So we just want to emphasize that flood control is given a high priority.
	Hydropower	• The Corps needs to consider that the economic benefits from hydropower production at Allatoona are minimal compared to its recreational uses. • Lake Allatoona should not be lowered to the winter pool it has been in the past. In the event of flooding rains, the dam can be opened to change water flow and water levels as needed. We have been fortunate this year that we had adequate rains, next year we may not be so lucky. We need to be proactive regarding any future deficits. This lake is an important asset to the Cobb/Paulding/Cherokee area for water, etc. • Lake Allatoona levels need to remain high for the benefit of many basin resources. Raising and lowering the lake taxes the water quality, the surrounding agriculture, animal/fish populations, navigation and hydropower. The only time the lake level should change is during heavy rains (lower levels for flood control) or drought (high levels to maintain stability of lake). • The fact that the ACT WCM EIS process is continually updating environmental requirements and continuing to reevaluate the environmental impact that humans have on the environment is very pleasing. It is important that hydropower continues to become the key component to abstaining energy in the Alabama-Coosa-Tallapoosa River Basin. I hope that this action passes and I am all for it.

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Issues Identified		Comments
		• Hydropower either needs to get its capacity and energy from the projects or be compensated fairly for the loss; compensation meaning cost of replacement power. The Corps is encouraged to define an appropriate baseline. This is not necessarily the way the basin has been operating. Certainly the congressionally authorized purposes need to take precedent over the incidental purposes that may have been added on since the projects were placed in service.
	Navigation	• Operation of the Alabama River under an updated water control manual should generate the highest output of benefits associated with those project purposes specifically authorized by the Congress. Other goals and needs are extraneous. In the case of navigation, the Corps has not provided the necessary funding or other needs to provide cost effective and reliable commercial navigation. The new manual and EIS need to address these deficiencies and incorporate those requirements to fully restore navigation, the primary purpose of the project. Any economic reanalysis that may be conducted as part of the EIS process should comply with the new Principles and Guidelines authorized in WRDA 2007, especially the use of multiple planning objectives, including public safety and regional economic development past capital investments in the project should be treated as sunk costs in such a reanalysis while recognizing the waterway's unused transport capacity relative to other modes and resulting environmental and social benefits. • Low water levels in Lake Allatoona not only make the lake less navigable, but have many impacts on local economies, including property value. The Corps should keep water levels up for longer periods. Lake Allatoona should not be held solely responsible for keeping water flowing into the Gulf. It seems that much of the drainage basin for the Etowah River is in Alabama. More than 50%. Why not have water restrictions like they are in Cobb county Georgia? • The River Region is going to become more important to the area as the foreign automakers build more plants.
	Recreation	• Sport fishing in Alabama was estimated (2006) to exceed $1, 400,000,000 and provide over 14,600 jobs. The Corps needs to consider that the ability of these users groups to access both impounded and riverine waters is directly related to launching facilities being fully functional at low water conditions. Additionally, water levels and connectivity in backwater areas of the ACT basin are important as nursery areas for rearing stages of many fish

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		and invertebrate species, and need to be maintained. • Please consider keeping the water levels in Lake Allatoona up to or near the 840 level. The studies I have seen at the LAPA meetings make it clear that the lower the water levels the lower the quality of the water and of the recreational opportunities. • The full pool level of Lake Allatoona should be raised by several feet. This should not have a negative impact on anyone and it would provide more water for recreation throughout the year. It seems that the boating season gets shorter each year as a result of the drought and required water releases. The increase in full pool levels would help offset this to a certain degree. • When we have conditions like in 2005, pool levels were 10 feet above full pool levels, why can't more of the water be maintained in the reservoir (Lake Allatoona) throughout the winter months and make the lake more drought resistant and more navigable for boat use year round. In the drought conditions of 2007 the Corps of Engineers waited too long before reducing water release to minimum levels which endangered the water supply which tens of thousands of people in Georgia depend on. There has to be a better balance than we have seen in the past 3 years. While water levels are low in winter months there is ample opportunity to dig using heavy equipment especially in the Allatoona creek portion of the lake which would allow for much more water to be retained in the lake and improve the appearance of the community year round instead of looking at a giant mud pit 6 months of the year. This could partially be paid for by residents who have dock permits or wish to obtain dock permits in areas of the lake where property owners adjacent to Corps land currently don't have water depths that would allow for docks. The Crops could also double the cost of the dock permits if enough water was retained to use the lake year round in all sections. • Why does the Corps start lowering Allatoona Lake right after July 4th? This is the south and we could enjoy the lake well up into the fall. Some years by Labor Day the lake is so low that it is dangerous to go boating. I do understand that we have been in a drought. But if there is water for drinking and no chance of a flood why not leave Lake Allatoona water levels higher and for longer. • Lake Allatoona should not be lowered to the winter pool it has been in the past. This lake is an important asset to

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		the Cobb/Paulding/Cherokee area for water, etc. Although less important, thousands of people use this lake for local recreation which is needed now more than ever. In the event of flooding rains, the dam can be opened to change water flow as needed. We have been fortunate this year that we had adequate rains, next year we may not be so lucky. We need to be proactive regarding any future deficit. • Property owners on Lake Allatoona are in favor of raising the winter pool levels to create additional recreational opportunities within the lake. • The reason for draining Lake Allatoona every fall until spring has been said to be for spring flood control. This explanation never really made any sense and with less average rains in several years, it especially does not now. If the true reason to drain the lake every fall is to effectively close it down to lower management expenses for seven months, the community will be better served knowing it is an economic matter. In that way public opinion and democratic processes could help shape resource allocation, as should happen in a democracy. If given the option, most users and lakeside property owners will probably be agreeable to increased user fees to keep the lake open year round. • Realizing that Lake Allatoona's primary function is for downstream flood control, there needs to be a review of the historical data to allow for better management of the lake levels. Currently, the water level required for Allatoona seems substantially lower than what should be required for flood control. Higher water levels during off peak season would help the lake in the areas of pollution and recreation, while maintaining safe flood control based on historical data and lake level limits. Regarding the timing of releases, based on historical weather patterns, the Corps now has data to determine the wet seasons and more accurately depict when the lake needs to be at its lowest point. If the curve could be adjusted to keep the water levels higher for later periods during the year the benefits again are the ones listed above relating to pollution and recreation, with the added benefit of drought remediation or protection. Finally, some flexibility should be built into the model so that during periods of drought or of predicted flooding the levels and release curves could be temporarily adjusted to accommodate the immediate needs. Giving the managing authority some flexibility to temporarily adjust the lake level guide lines to accommodate extreme weather conditions that may occur over a short period of time or possibly over several years would be an item of high benefit implemented with low cost and effort being one of the easiest changes to achieve with little or no environmental impact.

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		• The Atlanta Water Ski Club understands that the Corps' purpose in drawing down lake level is to prepare for spring rains and we are not suggesting any change to the winder pool that allows for this. However, given that October is typically the driest month of the year; it should still be easy to pull the level down far in advance of the next year's rains. We would like to express an interest in updating the guide curves that are used to determine when the lake is drawn down to the winter pool level. Historically, the draw down has always started immediately after Labor Day and we would like to see this start later in the fall. This would only be applicable in non-drought years of course, but would be very beneficial to all recreational users. • Please consider keeping the water levels in Lake Allatoona up to or near the 840 level. This will make recreation and recreation related revenue much higher. • There are not many campgrounds located inside the Atlanta Metro Area. The campgrounds and day use areas that have been closed on Allatoona Lake should be reopened. This is a great opportunity for the community to come together. This will also help families get back in touch with each other by getting them out of the 9-5 routine and into a relaxed environment to talk to each other. We spend millions on other forms of enjoyment that only last a few days or weeks, but camping is an educational experience that will last a lifetime for everyone in the family and you can always learn more from camping. The children of this country need to know that there are more options out there than computers and traffic, the only way they will be able to enjoy the great outdoors is to keep it local. These campgrounds are full most of the summer and they have to turn away hundreds of visitors. Please look at all the options to get the campgrounds opened back up. • Recreation is the main reason many people use Lake Allatoona and it brings in many dollars to our area. Other issues are also important and could be solved by the Corps at the same time that recreation is addressed. • The Corps should place more emphasis on recreational uses, and maintaining more stable water levels from May through September, and higher levels during the winter draw downs. The economic benefits from hydropower production at Allatoona are minimal compared to recreational uses. The watershed for Allatoona is too small to make any significant measurable differences in water flows downstream. The very best possible water quality should also be a primary goal.

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		• Recreation creates revenue to maintain the area. This source of revenue is preferred over a tax increase. • Lake water levels should be INCREASED & MAINTAINED throughout the year. Drought conditions should have taught us that. This should be an easy fix and add to the economy for recreation, throughout the year. Forecasting rain amounts with today's technology should not be a problem to control flooding. This opportunity to comment on the outdated regulations policy of lake management is appreciated. • The Allatoona Boat & Ski Club leases land from the Corps and would like to see the lake level stay up all year at least as much as our rain fall and water usage would allow. This would help the lake ecology and the appearance of the lake looks cleaner when it's full. • Lake level was great all summer long this year, enough to accommodate the many recreational boats, and lake quality this year seemed to be very good. Quality of water and water levels are very important to the local residents. The release of the water to our neighboring states is important, but not to the point where it effects the local resident's needs. • Dropping the water level the typical seventeen feet to winter pool has a drastic impact on retail marine businesses in Kennesaw, Georgia, as well as bait and tackle shops, gas stations, and marinas. If winter pool was at 830 feet, this would allow for lake usage year round. This would also help the fish population and keep the algae bloom in check.
	Agriculture	• Raising and lowering Lake Allatoona taxes the surrounding agriculture. The only time the lake level should change is during heavy rains (lower levels for flood control) or drought (high levels to maintain stability of lake). Keep Lake Allatoona lake levels high for the benefit of all resources indicated.
	Habitat	• The Corps should ensure that sufficient quality and quantity of water be provided in such a manner to resemble the natural riverine flow regime. This flow regime should provide aquatic habitat conditions that support a diversity of endemic aquatic species (including fish, plants, mussels, and other invertebrates) and their life cycle requirements. The biological response to these environmental flows should be evaluated and, if necessary, adjusted to meet the objective of maintaining ecological integrity. Many peer review studies indicate that current

Table 3-2: Scoping Comments Summary Table

Issues Identified		Comments
		release flows and flow patterns do not protect aquatic wildlife at Federal or private projects. • The Corps' development of an updated WCM for the ACT basin should reflect wildlife conservation actions indentified in Alabama's Comprehensive Wildlife Conservation Strategy (CWCS) where appropriate.
Ecological Resources	Ecological Resources	• A number of natural flow regime components (e.g., base, seasonal, and minimum/maximum flow levels, frequency/duration of low/high pulse flows, flow rise/fall rates and frequency of flow reversals) are important, even critical, to the long-term maintenance and protection of the basin's riverine fauna and habitats. The Corps should consider conserving/recovering as many of these natural flow conditions as possible in the development and implementation of the new WCM for the ACT basin. • Current dam operations at Lake Allatoona have detrimental downstream effects on water quality and the natural flow regime in the Etowah River, including dissolved oxygen levels, water temperatures, and flows. The Corps' WCM update should consider installing some method to increase dissolved oxygen levels in the Etowah River downstream of Allatoona Dam and if tailrace temperatures are likewise significantly altered from natural conditions, the Corps should consider a retrofit at Allatoona Dam that would more closely approximate natural water temperature distributions. • Current dam operations of the Carters Reregulation Dam may or may not have detrimental downstream effects on water conditions in the Coosawattee River, including dissolved oxygen levels, water temperatures, and flows. The Corps' WCM update should consider determining if downstream temperatures, dissolved oxygen levels, and flows are, in fact, significantly different from conditions that would naturally occur in an unimpaired scenario. If they are the Corps should consider: (1) a retrofit at Carters Reregulation Dam that would more closely mimic natural water temperatures and dissolved oxygen levels; (2) changes in operations at Carters Reregulation Dam that would more closely mimic natural changes in flow, at least during the portion of the year that is most sensitive to aquatic organisms in the downstream Coosawattee River. • The ecological integrity of riverine systems is intimately connected to the quality and quantity of stream-side floodplain forests and wetlands. The Corps' WCM update process should address effects to the vegetation ecology of adjacent wetlands and floodplain forests, as well as the wildlife resources dependant on them including

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Issues Identified		Comments
		migratory birds. For example, the endangered wood stork (Mycteria americana) relies on the shallow wetland areas adjacent to the Alabama River for foraging during the summer and fall each year. • Concerned about impacts to downstream species in Etowah River from releases out of Allatoona Dam
	Fisheries	• Dams on the Alabama River have blocked historic migrations of more than a dozen species of fish for several decades, and have contributed to the decline of the critically important Alabama sturgeon. The Corps should continue to facilitate research on fish passage at Corps dams on the ACT, with the goal of implementing reservoir operations that allow riverine species to travel their historic migration pathways. • The Corps' aquatic analysis must cover all effects on fish populations in both the river and in downstream reservoirs, not just T&E species.
	Threatened and Endangered Species	• There are at least 12 extant federally-listed species found in mainstream river reaches of the ACT basin that have potential to be affected by reservoir operations. There are also 8 federally-listed species found in tributary streams and nearby terrestrial habitats in the ACT basin that have potential to be affected by reservoir operations. In addition, critical habitat for 10 species of mussels has been designated throughout the ACT basin. Currently, critical habitat for one endangered species of fish, the Alabama sturgeon, has been proposed. The Corps needs to consider these species, other species that may be on the brink of requiring federal protection under ESA, and their associated habitat requirements in their analyses of the alternatives being considered under the ACT WCM update NEPA process. • Federally listed and candidate freshwater mollusks and fishes inhabit the main stem rivers of the Coosa Basin below Carters and Allatoona. Within the last 11 years these species are known to include: the federally-threatened goldline darter in the Coosawattee River below Carters Reregulation Dam, potentially the federally-endangered Etowah darter in the Etowah River below Allatoona Dam, the federally-endangered triangular kidneyshell in the Coosawattee and Oostanaula Rivers, shell material of the federally-endangered southern clubshelll in the Oostanaula and Coosa Rivers, and the Federal candidate species interrupted rocksnail in the Oostanaula River. A series of updated surveys of these federally-listed fishes and freshwater mollusks are recommended to accurately assess the potential impacts of the Corps' alternative actions.

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Issues Identified		Comments
		• The Corps must evaluate all impacts to aquatic species throughout basin, particularly T&E species and particularly in Etowah and Coosa Systems (including main channel and bypass reach below Lake Weiss). • The Corps should examine direct and indirect effects of manual revisions on T&E species in downstream portions of ACT basin and affects on meeting water needs in Atlanta area.
Other	Water Levels	• Lake levels and the amount of water that they're releasing downstream to Alabama and Florida are of primary concern, especially during the drought periods. The Corps needs to try to reduce the amount that they allow out to go downstream as much as possible to maintain our water levels. Also, in the winter, the winter pool should not be reduced as much as it has been, even if the Corps has to do that on a temporary basis due to the drought conditions that we suffered this past year. • Greatest concern is with the drought situation that we have been in the last few years and not knowing whether or not we're going to have any relief from this situation. A case in point, last year we had such a major drought that the lake went down to one of the lowest levels known. The Corps should raise the winter levels a little bit to alleviate this drought situation that we are having. We should keep the levels a little higher than the 823 that we currently keep in the wintertime - the 840 foot level is absolutely where the lake should be. In the summertime, levels should stay where they are, or even bring it up a little bit. • In lieu of an interim program modifying the winter pool during drought conditions, the long-term intent of the Corps WCM update project should be to permanently change the law so that the winter pool can be increased. • It is in the best interest of all concerned to maintain summer pool elevation as long as practical, and to minimize length of time the lake is held down in the winter. In general, Lake Allatoona is well managed by the corps of engineers. Additional resources need to be given to current staff. • The issue is the draining of Lake Allatoona each fall. The Allatoona Preservation Authority has completed an impact study and determined that you MUST have the lake level constant. If not, the health of the lake will be DEAD in 10 years, and that was about 5 years ago. The Corps must take steps to have the lake levels as constant as they can.

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		• The Corps should hold lake level at pool or above year round. It doesn't contribute that much to other states' water supplies and a year round, higher water level will improve the water quality of the lake. • The Corps should keep the Lake Allatoona levels as they are, because during the drought situation that we had last year there was water to share. In the winter if the Corps could raise the lake level a little bit more, we would have even more water to share. Sharing water is OK, but not lowering the water level, maybe even raising it as opposed to lowering the lake level. Also, the Corps should work more with the LAPPA preservation organization for Lake Allatoona. • Residents living on Lake Allatoona are concerned about the lake level in the summer as well as in the winter because of the drought.
	Interbasin Transfers	• The Greater Rome Georgia Chamber of Commerce would like to ensure that the water that we enjoy and have been good stewards of continues to be in Rome. We oppose interbasin transfers, but if water is going to be transferred, we would like it treated and returned to the point of origin, the point of origin, which environmentally maintain the flow and the levels of water. The City of Rome and Floyd County have been good stewards of water, as measured by the amount of money and the infrastructure spent on waste water treatment, as well as corrosion control, sedimentation, and so forth. There has been a long history of good and positive stewardship in Rome and we would hate to see the citizens of Rome and Floyd County be penalized for their good stewardship. • Any concept of interbasin water transfer is going to ultimately lead to a major problem. As a matter of fact, the whole concept of interbasin transfer is rooted in the concept of growth; and growth, for the pure sake of growth, is leading us down a very slippery slope. Example, Atlanta has over exceeded the Little Chattahoochee water supply and continues to grow. In summary, to make it real simple, we are setting ourselves up for long-term problems with interbasin transfers because we are artificially propping up a population that has already exceeded or at least reached its carrying capacity. There is a limit to human growth and the amount that we can squeeze out of our environment, and at some point we've got to use some wisdom to figure out where we stop. • The Rome City is concerned about interbasin transfer of water, certainly transfers out of our own river basin.

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		There is also concerned about the new Paulding County reservoir that could divert water out of the basin to Atlanta with no return. • Interbasin transfers will destroy the Coosa River Basin chain of lakes. Carters and Allatoona are Federal Reservoirs, built and operated with all taxpayers dollars. Atlanta was never a factor in the original plans for Carters and Altoona, but they are taking water that was meant for the Coosa River Basin. Our habitat and water quality is being affected, our cost to purify drinking water will be effected, and loss of river flows will reduce oxygen and kill fish and other aquatic species, etc. The Corps must also consider recreation, which is big business now and contributes greatly to our economics. Navigation will also be effected, as will power generation. • The Corps should lead an Environmental Impact Study, in conjunction with the U.S. EPA, to determine the deleterious effect that current, and planned increases of, interbasin transfers have on Lake Allatoona, the Upper Etowah River and the ACT Watershed. Would not Federal agencies supersede states' water rights because three States are involved in interbasin transfers from the ACT to the ACF? Adjudication is anticipated soon in the interpretation of Congressional Acts regarding the authority of the Corps to set storage allocations for water supply and determine what represents harm to previously authorized purposes of Corps Dams. • The Federal government may not be successful in preventing interbasin transfers between interstate watersheds. Regardless of the litigation outcome, the U.S. Army Corps of Engineers should impose surcharges on water storage that is used to supply landowners contiguous, but outside, the Basin. Non-basin Cobb-Marietta Water and Cartersville users of Lake Allatoona water should pay extra, as well as non-basin Upper Etowah users since the Upper Etowah River supplies 74% of the water flowing into Lake Allatoona and contributes nearly all its nutrient load. The fee should be greater than the infrastructure cost of pumping water back to the basin of origin; and a portion of the surcharge fee could be refunded according to the documented percentage of water returned. The fees would be legitimate compensation for actions necessary to maintain potable water quality in the Lake. In a similar policy, the Allatoona Dam Power Management Agency's contracts to preferred customers should have surcharges on water storage and hydroelectric power generation for the purpose of mitigating environmental deterioration caused by peak flows in the Lower Etowah River. Restoring the Etowah River's habitat to what it was 50 years ago is not realistic, but the future, real cost of this water resource must be shared equitably by its stakeholders, and, proportionately, with stakeholders in the Alabama, Coosa and Tallapoosa River basins.

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		• The Atlanta Regional Council initially included Cherokee County in the North Georgia Metro (Atlanta) Water District for its potential to supply water to Metro Atlanta and access to the north side of Lake Allatoona and the Etowah River. Metro counties east and south of the Upper Etowah River, in the adjacent ACF Watershed, developed land beyond the capacity of the ACF watershed. Instead of conserving or investing in water infrastructure, they use water transferred from the ACT basin to the Chattahoochee Basin, which eventually provides water downstream to Florida estuaries. We understand the right to reasonable use by residents in the Etowah Drainage Basin so long as it does not diminish the water quality and quantity for downstream users in the ACT Watershed, but object to depletion of our water resource for the benefit of other basins. • Georgia legislators have totally failed to address interbasin transfers and procrastinate from enacting and enforcing an operable State Water Plan. Lack of a feasible State Water Plan leaves the Georgia Environmental Protection Agency responding to local political pressures instead of managing water resources efficiently and cost-effectively for the State's future. What action has the Corps ACT District taken to adjust fees and charges to ensure that scarce ACT water is not wasted or lost to another watershed?
	Postpone WCM Update	• The Lake Martin Resource Association, Inc. (LMRA) urges the Army Corps of Engineers (COE) to immediately suspend the revision of the Water Control Manual (WCM) until such time as the current litigation between Alabama and Georgia is resolved by the courts. The lead case in this litigation is State of Alabama v. United States Army Corps of Engineers, CV-90-BE-1331-E (N.D. Ala. 1990). The ultimate resolution of this litigation will determine many aspects of water resource allocation between these two states and possibly Florida. The results of the revision of the WCM at this time could be rendered moot by the court proceedings. A much better use of taxpayer resources could be made by waiting until the court determines the resolution of water allocation issues before attempting to revise the WCM. Although the COE may believe it is following the law by revising the WCM, the results of the above-referenced litigation very likely will determine the law of the land with regard to many issues that will be of great relevance to the WCM. The COE has not revised the WCM since the 1950's. If the creation of a fair and balanced manual is the objective, there will certainly be no harm in waiting until the current litigation is resolved before completing this revision. • The State of Alabama, Office of Water Resources urges the Army Corps of Engineers (COE) to immediately suspend the manual update process until upcoming court rulings are issued.

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		• It is unwise to undertake any comprehensive revision of the ACT WCM at this time given that: 1) the FERC relicensing process for the Coosa Project and the Martin Project are incomplete; 2) finalization of the drought plan being prepared by Alabama Power and other state and federal agencies has not yet been completed; and the current federal litigation concerning the Corps' ACT operations has not yet concluded and the outcome of that case could have significant repercussions regarding the Corps' operational authority within the basin. • The Martin Project is in the early stages of the relicensing process and offers the opportunity for Alabama Power and the Corps to work together to develop optimal operating parameters for the Tallapoosa River reservoirs. A significant issue in the relicensing process is the potential for changing the rule curves to increase pool elevations at Lake Martin during certain times of the year. Alabama Power has already completed an initial evaluation of changing the rule curve, but additional studies and consultation among stakeholders are needed to fully evaluate the impacts of their changes on flood control, navigation, power generation, water quality, and other project and river basin resources. Additionally, Alabama Power intends to incorporate modeling of the Harris Dam existing operations into the final Martin Study Plan so that they can determine potential impacts to the Harris Reservoir of any rule curve changes at the Martin Project. Alabama Power believes that the relicensing of the Martin Project be substantially completed before the Corps undertakes any comprehensive update of the ACT WCM.
	Return Flows	• The Corps should study and implement operating rules that increase yield of federal projects via return flows and return flow credits, thereby encouraging communities to invest in environmentally responsible projects that maximize the rates of return water to the basin. This would also encourage implementation of conservation measures and improvements to system integrity designed to decrease "unaccounted for water" and policies to increase sewerage and decrease septic use. Similarly the Corps should evaluate rules that afford credit for other "made flows" such as those resulting from upstream releases from dedicated storage projects, such as the CCMWA and City of Canton Hickory Log Creek Reservoir. The Corps should also make use of this process to evaluate appropriate storage accounting mechanisms that accurately and fairly apportion reservoir inflows to the respective stakeholders. The Corps should also consider other potential mechanisms to increase the yield of Lake Allatoona, including an analysis of potential reductions to the seasonal draw-down and other possible rule curve changes at federal projects. • The Corps should clarify its policy with respect to return flows and consider granting all parties a right to return

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		flow credits similar to the rights CCMWA has under its current storage contract. Granting credit for return flow would allow the Corps to avoid inherent conflicts with states' administration of water rights.
	Drought Management Plan	• In updating the WCM, the Corps needs to develop and incorporate a comprehensive drought management plan that includes all ACT River Basin projects, public and private, based on lessons learned during the 2007-2008 drought period. The Corps should evaluate alternative operating rules that prudently and conservatively balance downstream flow requirements with the ability to capture and store water for use in times of drought. These operating rules must afford the Crops maximum management flexibility to quickly adapt to changing inflow conditions and should be evaluated and incorporated into any updated WCM. • The WCM update should integrate a basin-wide drought plan that addresses water allocation issues among stakeholders in Georgia and Alabama, as well as operation of the dams operated by the Alabama Power Company on the Coosa and Tallapoosa Rivers. The drought plan should adequately identify water quality and quantity needs at various times of the year.
	Mitigation	• The Corps should establish a goal to develop a fish passage plan for all Corps locks and dams in the ACT basin. Dams, in most cases, block the movement of catadromous, anadromous, and riverine fish species, resulting in fragmentation of native fish ranges and in disrupting life cycles of fish that depend on movement to specific locations to spawn, overwinter or oversummer. • The Corps should include an analysis of the impact of aquatic habitat loss due to the construction (1962 - 1975) of Carters Lake on the Coosawattee River in the ACT WCM update DEIS and, as a result, appropriate mitigation measures should be determined and implemented.
	Water Modeling	• To facilitate information sharing and involvement with the WCM update process, the Corps should form a technical working group of water modelers from interested stakeholders who are familiar with the HEC-ResSim Reservoir Simulation and meet on a regular basis during and after the completion of the WCM update.

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	Storage Capacity	• The Corps should expand the capacity of Lake Allatoona by dredging the lake and piling up the dredged material on the top of existing sandbars already in the lake. The advantage of this would be it can be done immediately. It doesn't expand the footprint, so you don't need new permits. And it's well within the Corps of Engineer's competence because they have been doing it for at least 40 or 50 years that I know of, keeping the inlets open up and down the eastern seaboard and the Mississippi River. Contaminated dredged materials could be handled by put ting up a cofferdam and putting a liner in it to contain the dredged materials. Once the new island is created, you cover it with clean material with no heavy metal or whatever in it and cap it just like we do a Subtitle D landfill.
	Alternative Water Sources	• The Federal government should require all new construction, amendments made from this time forward, to have a very active recycling program for RAIN RUN OFF from the following : 1. Roofs (commercial & Residential) 2. Parking Lots (Schools, Shops, Industries) 3. Road design to capture and redirect it areas (wetlands?) which could absorb the addition H2O. If we save the "FREE" water, we will have more water that we, all need to keep our life styles. P.S. I am very impressed with tonight's meeting and printed material. The Corps of Engineers has a very difficult job and is doing the best that they can under these difficult times.
	Environmental Compliance	• The WCM update process should consider the Corps' compliance with existing environmental laws. Specifically, the Corps should coordinate with the USFWS, the EPA and appropriate state agencies in Alabama and Georgia to ensure that the water control manuals are compliant with the Endangered Species Act and the Clean Water Act, as well as the Water Supply Act and the Flood Control Act.
NEPA Process	EIS Scope	• Because of the length and complexity of the ACT basin, the Corps must look comprehensively at the system when determining the proper scope of the EIS and evaluation impacts of and alternatives to the management of its reservoirs. • Because of the length and complexity of the ACT basin, the Corps must look comprehensively at the system when determining the proper scope of the EIS and evaluation impacts of and alternatives to the management of its reservoirs. • We understand that the Corps intends to document existing water management operations rather than prepare a

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		comprehensive update of the water control plan that would include consideration of alternative operations for the Corps' projects. Such a pre-ordained and limited process would do a great disservice to all those who rely on the Corps and its management of the water resources of the ACT River Basin, and would fall far short of meeting the Corps' obligations under NEPA. The purpose of the update to the WCM should be to develop an operational plan that most effectively manages the water resources in the ACT River Basin for the highest and best use. • The scope of the EIS should encompass entire ACT basin down to Mobile Bay, as well as the ACF basin, the latter because of ongoing and proposed interbasin transfers of water. • In updating the ACT WCM, the Corps must thoroughly consider and analyze the present and proposed future operations of the Alabama Power Company projects and ensure that the operations of the federal reservoirs, including Lake Allatoona, are not subordinate to the needs of Alabama Power's private projects. The Corps controls only 21 percent of the available reservoir storage in the ACT River Basin. The remaining 79 percent is controlled by Alabama Power Company through a series of projects on the Coosa and Tallapoosa Rivers, with nearly 50 percent of the total basin storage in Alabama's Lake Martin project. During the recent drought, Alabama Power maintained a nearly full pool at Lake Martin at the expense of Corps projects upstream in the Coosa River basin, particularly Lake Martin. • The process that the Corps should follow in the ACT WCM update includes the following steps: 1. Determine the critical yield of each reservoir using most updated hydrologic and climate conditions. 2. Establish a baseline for any proposed changes to the water control or master manuals. 3. Assess whether any changes to baseline conditions are necessary to comply with existing laws and regulations designed to protect the environment. 4. Analyze any proposed modifications to the baseline to develop the proposed operations for each reservoir. • It is necessary that the critical yields be calculated and the baseline established before any of the other steps are possible. The initial step is to update the critical yields for Lake Allatoona and Carters Lake, particularly covering the 2007 drought time conditions. This should be done in an open public process and with the full participation of ACT basin stakeholders. Once this is completed, the Corps can then work to establish the baseline conditions (Step 2 above) against which any proposed modifications to the WCM can be assessed.

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Issues Identified		Comments
	Impact Analysis	• Decisions made regarding flow into and out of Lake Allatoona can affect communities and species located many miles downstream, as well as WQ in the lake itself. Revisions to the water control manual will have obvious consequences to the current uses of Lake Allatoona, for the amounts of water released downstream, and for the aquatic habitat in the lake the rest of Etowah and Coosa River Basins. Because of these consequences, the Corps must base decisions on objective and transparent body of scientific data to underpin its comparative analysis of water release alternatives. • Indirect impacts must be included in the EIS analysis, including the indirect impacts of population growth and decreased air quality due to increased water allocations from Lake Allatoona • The Corps should conduct an analysis of cumulative impacts of maintaining or increasing flows out of Allatoona Dam to enhance ecological function in the Coosa River below Jordon Dam. Would also like to see analysis of cumulative effects of FERC relicensing process of eight Alabama Power Company dams in the ACT basin. • Agree that the development of hydrological models is necessary and appropriate; however, models need to be developed in transparent process where model and underlying data can be shared with the stakeholders for evaluation and comment. • Responder believes that the Corps should utilize existing tools (suggested by Alabama Power in 16 May 2008 letter to the Corps) developed in recent years by Alabama Power in studying changes to the existing reservoir regulation manuals for the Weiss and Logan Martin developments on the Coosa River as part of the FERC relicensing process. • The ResSim model should only replace the HEC-5 model after the technical staffs of the three states and the Corps agree that the ResSim model is a better tool to evaluate the ACT system. It would be inappropriate and premature for the Corps to develop the ResSim model without input from the states and without sufficient time for the states to develop expertise required to evaluate ResSim results. As a result the Corps should use the agreed upon HEC-5 model developed during the Comprehensive Study and used in the negotiations of the allocation formula under the ACT River Basin Compact unless a new model development is agreed upon by the Corps and the states. The state of Alabama respectfully requests that the Corps hold a public meeting with

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		interested parties to discuss the appropriate modeling platform to be used for the ACT water control manual development.
	Alternatives	• The Hickory Log Creek Reservoir permit should be considered as a proposed modification of the operations of the reservoir during this aspect of the manual update process. In addition, other proposed reallocations of water storage need to be assessed in the process including the State of Georgia's new water supply plan that includes various assumptions and projections regarding their use of water from federal reservoirs, Lake Allatoona and Carter Lake, over the next several years. Finally, a determination should be made whether the Corps has the authority to undertake the reallocation or must seek Congressional authorization to implement the proposed reallocations. • The Corps must look critically at the District's implementation of its water supply and water conservation plan in the course of the alternatives analysis. The Corps must look at other allocation alternatives, including conservation, and their effects on dam operations at Allatoona as part of the EIS process. • It is imperative that the Corps consider all reasonable operating alternating plans and not simply document existing operations. The Corps must not constrain itself at the outset to consider alternative plans that are limited by the Corps legal authority to change existing operations. Rather, the Corps should consider all reasonable alternatives to determine the highest and best use of reservoir storage given current conditions in the basin. If Congressional approval is required to implement the preferred water control operations, then the Corps should seek such approval. • In updating the WCM for the ACT River Basin, it is imperative that the Corps thoroughly analyze the entire range of possible operating alternatives. Any new model that is developed for this purpose must be thoroughly vetted and its underlying assumptions independently evaluated. Our review of the ResSim model has revealed potential flaws in the model assumptions, many of which relate to the capacity and operation of the Alabama Power projects. The Corps should convene one or more technical workshops so that expert modelers can work collaboratively to improve any new model that is relied upon to evaluate potential operations. • Allatoona Dam operates in a hydropeaking mode, generating power between 2 to 6 hours during normal

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		operations each weekday. Weekend generation may occur if required to meet customer needs, but generally only about 250 cubic feet per second minimum flow is released on weekends. The Corps should consider dam operations at Allatoona Dam that would more closely mimic the natural flow regime, such as implementing a non-peaking window during the portion of the year that is most sensitive to aquatic organisms in the downstream Etowah River and develop a WCM minimum flow operation alternative that more closely approximates the natural flow regime. This could be compared to baseline and other operation alternatives for potential relative effects using the Riverine Community Habitat Assessment and Restoration Concept (RCHARC) or other similar methodology as was done in the ACT basin water allocation DEIS. • Carters Reregulation Dam's current minimum flow is 240 cubic feet per second (cfs), which represents the annual 7Q10 flow. This flow represents a 10-year drought event used to establish effluent limits that prevent pollution concentrations for exceeding acceptable under extreme low flow conditions, not for establishing base flow conditions for protecting aquatic organisms and habitat, and has resulted in reductions in available habitat for fish and other aquatic life. The Corps should consider analyzing an operations alternative that more closely mimics the natural flow regime for comparison with the current minimum flow of 240 CFS. The flow alternatives that will be considered for the WCM update should be analyzed for potential relative effects to downstream biota by using the Riverine Community Habitat Assessment and Restoration Concept (RCHARC) or other similar methodology, as was done in the ACT basin water allocation DEIS.
	Baseline Conditions	• Establishment of the baseline must originate with the original congressional authorizations or following any approved reallocations. The current flood control operations must be revised to reflect the 50 years of basin alterations that have occurred since the original design of the flood control operations. There must be established priority for releases. Only releases for authorized purposes or releases that have been approved through legislative actions should drive the decision process. • The State of Alabama believes that the Corps should use the 1979 water control plan for Carters Lake and the 1962 water control plan for Lake Allatoona to determine if there is sufficient water in each reservoir to meet the Congressionally authorized project purposes of Hydroelectric power, flood control, and navigation support and to provide water storage for the specific amounts of storage currently under contract. Alabama also believes that

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		the baseline or "no action" alternative must start with the currently approved WSM's for each reservoir, not draft manuals, action zones or other proposed operations that have not been subject to public scrutiny demanded under NEPA. By proposing a baseline of 2004, the Corps is violating an unambiguous Congressional enactment that expressly recognized the agreements of Alabama, Georgia and the Corps as expressed in the ACT Compact and the documents that led to the enactment of the ACT Compact. • Moreover, the baseline should be based on the amount of storage currently under contract and should assume that the contract amounts establish limits or caps on the amount of water that can be withdrawn for water supply purposes. Specifically, the baseline should not assume that the current practice of allowing water withdrawals in excess of contract amounts by the Cobb County-Marietta Water Authority will be continued in the future.
	Public Communication and Scoping Meetings	• More than 50% of the attendees in Kennesaw, Rome, and Gadsden have expressed their concern that there was no opportunity for public dialogue. There should be a way to maintain control of the meeting, be considerate of the time schedule, and at the same time, allow for public questions and comments. Several persons left early because there was no opportunity to "voice" their concerns to the entire gathering. Some drove several hours with the intent to speak at a public meeting. • This was a very good and informative session. I wish more people would have known about it. • Thanks for offering to us the opportunity to weigh in on the pending manual updates.
Cultural Resources		• No specific comments