APPENDIX E SCOPING COMMENT SUMMARY TABLE

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment
NEPA Process (NEPA)	
NEPA1	The No Action Alternative should assume current water supply demands. The No Action Alternative is the alternative that represents the de facto status quo with regard to agency action. In other words, the No Action Alternative must represent how the U.S. Army Corps of Engineers (USACE) is currently operating Allatoona Lake. Georgia understands that the USACE is considering two options for water supply demands under the No Action Alternative. The first option is to use a water demand that caps withdrawals at contract amounts as determined by the USACE current storage accounting methodology. The second option is to use a water demand that represents the actual amount of water withdrawn from the lake without an artificial cap. The USACE must choose the second option because it is the true No Action Alternative—that is, actual withdrawals represent the current status quo at Allatoona Lake and are consistent with how USACE is operating Allatoona Lake. The USACE, however, should also model the first option—capped withdrawals—not as the No Action Alternative but as an alternative baseline. The USACE should model both a No Action Alternative and an alternative baseline to address the disconnect the USACE created when it failed to consider water supply while updating the Alabama-Coosa-Tallapoosa (ACT) Basin Water Control Manual. The Record of Decision for the Manual adopts an alternative that implicitly caps Cobb County-Marietta Water Authority (CCMWA) withdrawals yet, in practice, USACE is not capping CCMWA. (GAEPD)
NEPA2	The Future Without Project Alternative should assume Georgia's 2050 water supply demands. The Georgia's Updated Request demonstrates that the State's water demand will increase in the future. This increased future need is the reason Georgia is requesting additional storage. (GAEPD)
NEPA3	The USACE April 30, 2018 Federal Register Notice states that the Supplemental EIS will include two separate studies: the reallocation Study that USACE is under Court order to address and the Flood Study that USACE is choosing to address. Georgia understands that USACE plans to address each study separately. USACE will perform the Reallocation Study, evaluate all Reallocation Study alternatives, and then choose a preferred Reallocation Study alternative. USACE will separately follow the same process for the Flood Study, that is, all Flood Study alternatives will be evaluated against each other before USACE selects a preferred Flood Study alternative. Only after selecting the preferred alternative for each separate Study will the Corps evaluate the overall impacts of the combination of the two alternatives. Georgia maintains that this is the correct sequencing. (GAEPD)
NEPA4	Based on decades of interaction, APC, FERC, and USACE have worked on this flood easement elevation issue and established release rates which should serve as the baseline for the USACE to use in the SEIS. With all the information provided to (and the interaction with) USACE by APC over the past 14 years, Alabama does not understand the need for the Weiss and Logan Martin projects being included in the USACE SEIS and formally encourages USACE to accept FERC's environmental assessment and "finding of no significant impact." This result seems appropriate considering USACE's involvement as a cooperating agency. If USACE cannot or will not exclude the Weiss and Logan Martin projects from the USACE SEIS, Alabama requests that USACE accelerate the review of the proposed changes after APC submits the additional requested hydrologic and hydraulic engineering analyses and approve the longstanding operations at Weiss and Logan Martin by APC. (ALOWR)
NEPA5	USACE must evaluate the effects of the action against the appropriate baseline condition. The No Action Alternative should be the status quo, including current levels of water supply use. USACE has suggested that the "baseline" for its analysis is USACE existing operations under the 2015 ACT Water Control manual with "current demand (up to limits of available storage)." The USACE "No Action Alternative" should not include a "cap" on CCWMA's withdrawals based on the disputed USACE storage accounting rules. (WSP)

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Number	Scoping Comment
NEPA6	While the correct No Action Alternative is the status quo, the USACE failure to address water supply issues when it updated the ACT Master Water Control Manual creates some ambiguity regarding the proper baseline. Some have suggested that using uncapped withdrawals as the baseline condition hides the effects of water supply withdrawals that purportedly exceed what the storage contracts allow. To address these claims, and to ensure that any EIS fully analyzes and discloses the effects of the USACE actions, USACE should consider including an "alternative baseline" in the SEIS in which water supply withdrawals are capped under the disputed storage accounting rules. This alternative baseline could then be compared against both the No Action Alternative and the other alternatives under consideration. (WSP)
NEPA7	The No Action Alternative and the Future Without Project Condition should be analyzed using the same hydrology. In the USACE interagency scoping meeting presentation, USACE stated that the "baseline condition" (or No Action Alternative) would be analyzed using a hydrologic time series covering the period from 1939 to 2012. However, in discussing the Future Without Project Condition, USACE did not specify the hydrologic period that would be used, but instead stated only that it "includes climate change analysis." If USACE is suggesting that the No Action Alternative and the Future Without Project Condition would be analyzed using different hydrologic records, we do not concur. All project alternatives should be analyzed using the same hydrologic conditions, as that is the only way to isolate and discern the impacts of any actions USACE or others might take. In contrast, analyzing future conditions using a changed hydrology would confound the analysis, making it impossible to determine whether the projected effects are due to the actions under consideration or the changes in the hydrologic record. (WSP)
NEPA8	USACE should consider potential climate change effects. However, this should be a separate analysis designed to show the potential effects of the alternatives under possible future climate scenarios. (WSP)
NEPA9	Disaggregate the NEPA analysis for the Logan Martin and Weiss dams from the analysis necessary to support the State of Georgia's water supply request. Although the efficiency of combining the review for these three different proposed actions would appear logical, as all three actions would involve the ACT River basin, a legal challenge in connection with the hydropower license issued to Alabama Power Company (APC) by the Federal Energy Regulatory Commission (FERC) calls into question the operational paradigm for these two projects. As a consequence, it appears that the legal status of these projects remains subject to further administrative proceedings which may affect the underlying action that the USACE proposes to examine with the Notice of Intent. (SeFPC)
NEPA10	It is paramount that USACE honor the authorized project purposes to establish the proper baseline from which to measure whether there may be an adverse impact on authorized project purposes or whether a major operational change may be required. It remains important to establish for the record the authorized project purposes and the source of the authorization for purposes of the USACE analysis. (SeFPC)

Summary of Scoping Input

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Number	Scoping Comment
NEPA11	The scope of the NEPA analysis must originate with a proper baseline from which to measure the impact to authorized project purposes. Start from the premise of the water supply that is authorized and reflected in the current contracts rather than the withdrawals that have occurred and exceeded the available storage in the contract. This is the appropriate starting point from a legal perspective to determine not only the impacts for consideration of the Water Supply Act of 1958 (WSA) but also the amount of storage that should be brought under contract. If USACE utilizes the actual withdrawals of 47.1 mgd that occurred in 2006 as the baseline for evaluating a reallocation of storage, the baseline for measuring impacts against authorized project purposes will already include a withdrawal level that USACE has admitted violates the terms of the 1963 contracts. Furthermore, it will build into the subsequent storage contracts an amount of "free" storage, a highly prejudicial outcome for hydropower customers in light of the fact that the CCMWA has been using more storage than its contract allows for many years. For the proper analysis for the reallocation of required storage, the baseline must start with the legally permitted withdrawals of 34.1 mgd rather than the 47.1 mgd that USACE relied upon in the final EIS for the ACT Water Control Manual. (SeFPC)
NEPA12	The scope of the USACE analysis of the proposed Allatoona water supply storage reallocation must address the legal basis of—as well as the need for—any reallocation and fully and accurately assess its potential impacts, including downstream impacts to water quality, hydropower, flood control, navigation, and recreation. (APC)
NEPA13	Given the history of USACE/FERC/APC coordination of flood risk management considerations for Weiss and Logan Martin lakes, any additional evaluation of the potential environmental impacts of APC's proposed changes based on new information should not itself require an EIS. An Environmental Assessment (EA) alone should be adequate to satisfy NEPA requirements. The scope of any such EA would necessarily be narrower than the proposed SEIS, which would include the evaluation of unrelated changes proposed at Allatoona Lake. The current USACE proposal to prepare a single SEIS for all three projects will only further delay the proposed changes to APC's flood operations and guide curves at Weiss and Logan Martin. (APC)
NEPA14	Since the ACT water control manual has so recently been updated, explain why this study is being conducted.
NEPA15	Public scoping meetings should be held closer to the affected lakes.
NEPA16	Notify lake neighbors of scoping meetings through flyers or postings (physical, not electronic).
NEPA17	The "vote by dots" board used at the scoping meetings was confusing because it listed three overlapping categories: wildlife; threatened and endangered species; and fish and aquatic resources. This will make findings less accurate.
NEPA18	Have concerns in relation to dropping Allatoona Lake by 6 feet, starting months earlier than normal. Are there other alternatives to this?
NEPA19	The canvasing exercise environmental considerations at the public scoping meetings will yield misleading results without qualifier descriptions of each category.
NEPA20	More information is needed on what is planned for Allatoona Lake. Information provided to date does not provide a clear indication about the proposed action or what alternatives may exist. The information at the scoping meeting did not provide a clear and concise picture on what is being planned and has been translated by many as a lack of transparency. The Allatoona community requests a seat at the table as a key stakeholder of the future planning for the lake, similar to CCMWA and APC.

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Number	Scoping Comment
NEPA21	There is no transparency in the planning process until the USACE sees fit to drop its proposal and, while we can add comments, we would be commenting blind because the Corp has not disclosed its plan for Allatoona Lake. Recommend a follow up scoping meeting once more concrete plans concerning Carters Lake and Allatoona Lake are developed.
NEPA22	Concerned that the USACE will give in to political and corporate pressure so that CCMWA and APC are made happy at the expense of others. Concerned that this process may have a foregone conclusion.
NEPA23	Provide specific information about potential impacts on wildlife, water costs, water quality impacts, and pros/cons of different options, including the options of "no change."
NEPA24	Consider selecting Pell City as a location for future hearings on this matter. As a centrally located municipality, the City would provide an easily accessible location for homeowners in the City, as well as many surrounding areas. The City also offers access to those in the Birmingham area, who may be more prone to attend the meetings at our location.
Water Supply (WS)	
WS1	Recommend continued implementation of efficiency or conservation measures as a mechanism to minimize water supply withdrawal or storage use. (USEPA)
WS2	In determining its authority to reallocate storage at Allatoona Lake, USACE should follow the process outlined in the 2012 legal memorandum authored by the USACE Office of the Chief Counsel when USACE was determining its authority to reallocate storage at Lake Lanier. The 2012 legal memorandum recognized that USACE must focus on how a reallocation might affect the other congressionally authorized purposes for the project instead of determining whether a given reallocation is "major" based on an arbitrary percentage established without any analysis. Georgia maintains that the appropriate method for determining whether the USACE has the legal authority to allocate storage in Allatoona Lake under the WSA is for USACE to examine the impact of Georgia's Updated Request in the context of the original congressional authorization for the project. (GAEPD)
WS3	Georgia's updated water supply request provides the total projected demand for the Water Supply Providers (WSP). In the USACE interagency scoping meeting presentation, USACE stated that Georgia's March 2018 update to the water supply requests "assumes full credit for Hickory Log Creek Reservoir releases." The meaning of the USACE statement is unclear. To clarify, Georgia's March 2018 submittal stated that the total year 2050 projected demand for CCMWA and the City of Cartersville is 94 mgd. This demand remains unchanged regardless of how it is satisfied. While the request asked USACE to evaluate alternatives that would credit releases from Hickory Log Creek Reservoir and other made inflows, as described above, the projected future demands in that submission—57 mgd for CCMWA and 37 mgd for the City of Cartersville—reflect the total projected gross demand in the year 2050 for these jurisdictions. The projections are not dependent upon assumptions regarding the treatment of releases from the Hickory Log Creek Reservoir or on the availability of supplies from that project, but rather reflect the total demand expected to be supplied from existing and/or reallocated storage in Allatoona Lake. (WSP)

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Number	Scoping Comment
WS4	USACE is not obligated to approve additional water supply to Georgia or CCMWA, since Allatoona Lake does not have water supply as a federally-authorized purpose. (ALOWR)
WS5	CCMWA's history of illegal withdrawals supports the denial of the water supply request or the establishment of strong enforcement mechanisms. CCMWA itself has admitted as much, taking the position that CCMWA's repeated violations have created a status quo whereby Georgia should be granted *more* storage. In open court, CCMWA's counsel admitted it has exceeded its contractual limits for water diversion every year since 1986—including multiple exceedances in 2016, a drought year when Coosa River flows at the Alabama-Georgia state line were at historic lows. (ALOWR)
WS6	Grant of any additional water supply storage space in Allatoona Lake to CCMWA must be accompanied by enforcement mechanisms that will do something to prevent CCMWA from acting illegally in the future. Any new water supply contract must be accompanied by assurances that the U.S. Department of Justice (DOJ) will act in the event of any exceedances. If it will not act, then interested parties such as Alabama must be given the independent right to enforce relevant contractual limits against Georgia and CCMWA. To facilitate enforcement, USACE must hinge any acceptance of the water supply request on the condition that any water withdrawal exceedances be automatically reported to DOJ, Alabama, and the general public. USACE should provide that Georgia must pay severe fiscal penalties in the event of a breach and lose its easement to withdraw water from Allatoona Lake. (ALOWR)
WS7	USACE should set objectively recognizable limits on its authority to reallocate storage space at Allatoona Lake under the WSA. Allatoona Lake does not have water supply as an authorized purpose. The congressional delegation of authority under the Act is predicated on meaningful limits on its reallocation authority, such as the ones that currently are present in USACE's engineering regulations. USACE also must define the term "project," in the context of assessing whether a reallocation would seriously affect "project" purposes, to include only Allatoona Lake. If the scope of a project's original authorizing legislation was limited to a single dam-and-reservoir facility, USACE has no authority to artificially lessen the hydrologic impact of its water allocation decisions by referring to effects on project purposes at other facilities in the basin. This improperly holistic approach is contrary to the WSA's text, which requires congressional authorization if a modification "of a *reservoir project*" would "seriously affect the purposes for which *the project* was authorized ... or would involve major structural or operational changes." (ALOWR)
WS8	The analysis behind Georgia's water supply request is not thorough enough. The request seeks a diversion of storage capacity in Allatoona Lake to sustain *annual daily average* withdrawals, when USACE allocations are traditionally done as a *percentage of conservation storage* or a total volume of water. Georgia's request therefore necessarily involves an estimate of an estimate, in that the *projected* need for Georgia users is stated in terms of a yield figure, itself an estimate of a sustainable rate of withdrawal. The potential for inaccuracies in the estimation of yield from a given storage, is just one example of the potential inaccuracy brought on by Georgia's approach. Using an annual daily average figure rather than acre-feet in storage accounting also leads to seasonal inefficiencies because total inflows and losses change throughout the seasons, meaning that the rate at which any user (or group of users) can safely withdraw water is much different in January than in, say, August. (ALOWR)
WS9	Another problem with Georgia's move away from using acre-feet elevation of conservation storage as the unit by which to evaluate its 2018 water supply request is that, according to ER 1105-2-100, USACE's congressional authority to manage the ACT River Basin is discretionary only insofar as no more than 15 percent of total storage capacity, or 50,000 acre-feet of elevation, whichever is less, is affected by any proposed change. ER 1110-2-240 states that USACE management of a multipurpose reservoir such as Allatoona Lake must strike a balance between the use of water storage for all project purposes. USACE must provide details as to how it will consider Georgia's request for an annual average daily amount as a percentage of conservation storage. (ALOWR)

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Number	Scoping Comment
WS10	Paulding County presently receives about 10.6 MGD from CCMWA. However, Paulding County is constructing a pumped storage reservoir (Richland Creek Reservoir). Once completed, the Richland Creek Reservoir will supply the County its primary water supply, freeing up roughly 10.6 MGD for the CCMWA. The effects of Richland Creek Reservoir are not addressed within Georgia's March 2018 water supply request. Moreover, Paulding County obtained a permit to build a reservoir at Richland Creek with a yield that far exceeds Paulding County's projected needs. The excessive storage available in Richland Creek should be deducted from Georgia's water supply request. Richland Creek's impact on Allatoona Lake water releases (and, ultimately, the flow at the Alabama-Georgia state line) must be included in the USACE evaluation. (ALOWR)
WS11	Georgia's March 2018 water supply request fails to consider the option of incremental allocations of storage for water supply. By requesting storage reallocation today for millions of gallons per day in withdrawals to meet projected 2050 demands, Georgia is over-asking for whatever its needs are in 2018. None of Georgia's modeling for its 2018 water supply request allowed for the more sensible possibility of incremental allocations that increase with Georgia's more short-term demand projections. The necessary over-asking in every year prior to 2050 is exacerbated by the uncertainty factor applied by Georgia on a scale of 3 percent in 2018 to 13 percent by 2050. (ALOWR)
WS12	Georgia's technical analysis of its March 2018 water supply request does not appear to include any consideration of the effects of its requested allocation of "made inflows." An analysis of the effects of the "made inflow" concept is necessary in order to truly predict and evaluate the overall effect of the Georgia's request on downstream users such as Alabama. The inclusion of these "made inflows" into the model would necessarily reveal a significant impact to Allatoona Lake and the quantity of water available for downstream users like Alabama. In this sense, "made inflows" is not water created by CCMWA. This water exists in the Basin and would move through the project with or without any interference by CCMWA. In the 2018 request, however, Georgia refers to "made inflows" as somehow augmenting natural inflows. "Made inflows" are nothing more than *natural* inflows that have been impounded, redirected, or otherwise utilized before being released again into Allatoona Lake. (ALOWR)
WS13	The demand projections in the Georgia 2018 water supply request are flawed. Georgia's 2018 request is supported partly with a memorandum by the Director of the Metropolitan North Georgia Water Planning District (MNGWPD). The memo outlines Georgia's anticipated water supply demands from and returns to Allatoona Lake through 2050. As part of the calculations, the memo states that water conservation in the MNGWPD has reduced per capita water usage by 34 percent from 2000 to 2015, with a corresponding 10 percent decrease in water supply withdrawals over the same period. Using this reduced rate as a constant, the memo projects that 2050 demand will be around 25 percent lower than the 2009 report's projections (for 2050). Closer analysis shows that most of this overall decline in per capita water use occurred between 2000 and 2009, and much less of the decline occurred between 2009 and 2015. The 2009 report provided the basis of Georgia's 2013 water supply request, but this 2015 memo provides the basis for the present 2018 request. However, there is a *significant* difference in the MNGWPD's 2009 and 2015 demand projections. The latter memo states that MNGWPD jurisdictions are newly projected to use about twenty-five percent less water in 2050 than they were when the MNGWPD's plans were updated in 2009. If over eighty-five percent of the per capita water usage decline occurred before 2009, there is no justification for the significant reductions in demand due to conservation as applied to the 2018 request. (ALOWR)

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Number	Scoping Comment
WS14	The current storage contract at Allatoona Lake that is held by CCMWA is insufficient to meet current needs and is entirely inadequate for future demands. Materials released by USACE in connection with the ACT water control manual updates unequivocally admit that CCMWA has made withdrawals that exceed current storage contracts. Because excess withdrawals are not covered by contract, delays in the evaluation of the water storage study accrue to the detriment of not only water supply stakeholders but also hydropower customers that rely upon the Allatoona project for capacity and energy. (SeFPC)
WS15	USACE must measure the water supply storage to be allocated by the same measurement standards authorized under the WSA of 1958 rather than the withdrawal levels that have exceeded the current storage contract held by the CCMWA. (SeFPC)
WS16	As the original authorization and subsequent public laws expressed congressional commitment to hydropower production at the time of construction, no such authorization exists for water supply at Allatoona Lake. Rather, water supply has been added as an authorized project purpose through the application of the WSA of 1958. The amount of water supply that may be available from Allatoona Lake remains confined to the restrictions of the WSA of 1958 and the limitations on reallocations that would adversely affect authorized project purposes or require major operational changes. Because USACE has exercised the authority provided by the WSA of 1958 to add storage for water supply for CCMWA in 1963, water supply is an authorized project purpose at Allatoona Lake. The extent of this authorization, however, is set forth in the current contract CCMWA has with USACE. (SeFPC)
WS17	USACE should consider the practical impacts of its water supply operations in Allatoona Lake, which have often gone beyond the legal limits provided under the WSA and existing water supply contracts with CCMWA and the City of Cartersville. Data made available by USACE indicates that CCMWA and Cartersville have both routinely exceeded their contractual water withdrawal limitations. Apparently, CCMWA has withdrawn at least 80 percent more than its storage contract allotment in every year since 1998. USACE has never undertaken any action to enforce contract limitations and has, in fact, tailored its reservoir operations to facilitate these excessive withdrawals. Any consideration of reallocation must also include enforcement mechanisms for violations. USACE should consider contract terms with explicit, meaningful penalties; otherwise blatant disregard of contract terms will likely continue. (APC)
WS18	It is unclear how USACE intends to analyze the totality of water supply operations in the upper Coosa Basin. APC understands that USACE intends to consider “pass through” operations from Hickory Log Creek reservoir as if those operations did not impact storage at Allatoona. Any inflows to Allatoona—regardless of source—should be treated as normal inflows to the lake and should not be credited to any particular user. Any water passed through to Allatoona for water supply purposes should be accounted for as part of any water supply agreement subject to the WSA. (APC)
WS19	The scope of the USACE evaluation of Georgia’s March 30, 2018 reallocation request for Allatoona should include the option of denying the request. USACE evaluation of the reallocation request must recognize the legal limits of USACE authority under the WSA. Allatoona Lake was not originally authorized for either recreation or water supply. The only possible authority the USACE has to operate Allatoona for water supply derives from the WSA. The WSA only allows USACE to reallocate storage to water supply so long as the authorization would not “seriously affect the purposes for which the project was authorized, surveyed, planned, or constructed.” (APC)
WS20	If water flow into Weiss Lake is decreased, it may adversely affect the use of the lake for municipal and industrial (M&I) water supply.
WS21	Concerns that increased Georgia withdrawals from Allatoona Lake will decrease water availability for water supply in Alabama and result in shortages.

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Number	Scoping Comment
WS22	USACE decision criteria should be governed by the principle that each major river basin should live within its existing watershed basin means, outside true emergency conditions, or should pay the injured locale for the right to remove capacity from one region to another. The northwest Georgia region should not have its assets (water) stripped to support the aggressive and oftentimes unbridled growth practices of, in particular, Fulton and Gwinnett Counties.
WS23	Consider several feasible long-term natural water supply storage alternatives. To bring these to reality you need foresight, patience, pumps, pipes and proactive-cooperative cross-governmental management, and money (likely much less money than the economic penalty that the State seeks to thrust upon us). Our metro area neighbors in the Lanier/Chattahoochee Basin should be mandated to care for their own drought supply needs routinely, instead of seeking to take from Etowah River resources for their solution. Initial prospective water storage sites for USACE consideration: Hurricane Hollow at the dam, Marble Road Quarry adjacent to Little River, Pumpkinvine Creek below Allatoona Pass, Vulcan Quarry off McKaskey Creek; Paga Mines below the dam; downstream Etowah Reregulation Dam; etc.
WS24	It is not clear how much water would be taken for water supply, particularly in the winter months, and the resulting effect on Allatoona Lake levels.
WS25	Metro Atlanta needs to look at the Tennessee River again as a potential source of future water supply.
WS26	Concerned about reallocation of Allatoona Lake storage for water supply. Governing bodies of Atlanta and Georgia have not planned for adequate water supply for the growth of the Atlanta area. It has been common knowledge for decades on how fast the Atlanta area has grown and continues to grow. Instead of investing taxpayers' money into basic infrastructure requirements such as water reservoirs, water supply infrastructure and sewage treatment facilities, they have placed priorities elsewhere. They should not be allowed to take resources from other cities, states and watersheds to reduce their own problems due to poor planning and management. Atlanta and Georgia must invest into new reservoirs and related infrastructure to supply their current needs and future growth.
WS27	Recognize that there may be an increased withdrawal from Allatoona by Georgia or Atlanta, but it doesn't necessarily have to equal the full amount they are requesting. Atlanta has reduced the amount they are using per capita. Unfortunately, they are growing to the point where the reduced per capita rate is offset by the increased numbers of people requiring water.
WS28	These is a lack of a long-range plan for water supply in the Atlanta area. What is under consideration will only take us to 2050, essentially a generation. A long-range plan is needed so future generations are not forced to fight over water.
WS29	Areas that wish to pull water from Allatoona Lake are not doing enough to conserve water to limit taking more resources. Build more reservoirs locally and in Alabama.
WS30	Concerned about the additional water consumption request from CCMWA and how the additional water would be used. Will there be contracts to sell water to Fulton or metro Atlanta interests? Concerned about the effects of additional withdrawals on recreation, water quality, and shoreline management of Allatoona Lake.
WS31	Do not allow the state of Georgia, Acworth, CCMWA, Cartersville, and others to take water from Allatoona to sell to other cities and deplete the lake.

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Number	Scoping Comment
WS32	Oppose the proposal to increase the allocation to Allatoona Lake Reservoir which would effectively increase the ability of Atlanta to draw off an additional 44 million gallons per day. Their allocation of 50 million gallons per day is already high considering that it is unlikely any of the water drawn by Atlanta is returned to Allatoona to be available downstream. To increase that amount to almost double would have significant effects downstream in terms of reduced flow.
WS33	Using Allatoona Lake water for water supply in order to sell it to other municipalities is not appropriate. Those municipalities should be addressing their own needs.
Flood Risk Management (FRM)	
FRM1	USACE also plans to study potential changes to existing flood management operations at the Weiss and Logan Martin reservoirs on the Coosa River ("Flood Study"). APC operates these projects subject to a license from FERC. A recent court decision from the U.S. Court of Appeals for the D.C. Circuit, however, overturned FERC's decision and vacated APC's license. Despite the court decision and the license vacatur, if USACE decides to proceed with the Flood Study, it must consider whether the statutory limits placed on APC's ability to modify flood operations at the Coosa River projects prevent USACE from decreasing available flood storage. In Public Law 83-436, Congress expressly limited the ability of future project developers on the Coosa River, such as APC, to alter flood control storage for the projects. USACE must determine whether APC's requested changes to *minimize flood control storage* are consistent with Public Law 83-436. (GAEPD)
FRM2	Georgia understands that USACE is considering factoring in available flood storage at Allatoona Lake to determine whether proposed changes at the Weiss and Logan Martin projects comply with Public Law 83-436. This statute, however, does not reference or contemplate flood control storage in Allatoona Lake. Instead, it is specifically and expressly limited to the "Alabama-Coosa River and tributaries." Therefore, it would be inappropriate for USACE to consider available flood storage at Allatoona Lake in connection with the Flood Study. (GAEPD)
FRM3	Alabama understands that (1) materials presented at the USACE public scoping session were not accurate, (2) actual flood impacts from APC's proposed changes will be minimal, and (3) the proposed changes will not significantly change APC's current project operations at Weiss or Logan Martin projects. (ALOWR)
FRM4	USACE public scoping meeting materials suggest the USACE may consider a variety of different water supply scenarios at Allatoona, some of which could impact flood control operations at Allatoona or downstream at other ACT projects, including APC projects. USACE must consider any such impacts on flood risk. (APC)
FRM5	Any change in winter pool level should seriously consider impact on flooding downstream, especially in Rome, and increase sewer system overflow.
FRM6	Aware that raising the Weiss Lake pool in winter requires a lot of study. In favor of raising winter pool level as long as flood risk management can be maintained.
FRM7	Numerous people would like to see the winter pool elevation increased at Weiss and Logan Martin lakes. Others are concerned that doing so would cause flooding issues at Weiss Lake and Logan Martin lakes (both in lake and/or downstream).

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Number	Scoping Comment
FRM8	Commission an objective Flood Retention Risk Assessment Update (for Allatoona Lake) based on the now 120 years of weather history to work toward a goal of reduced required winter drawdown levels flood storage needs.
FRM9	While the City of Pell City advocates for ample consideration of this modification to the winter pool level at Logan Martin Lake, that support is lent with the understanding that it can be obtained without increasing the risk of flooding in the area. Based on the materials presented, the City understands that the flood control aspects of this modification will be closely studied, and that the modification will only proceed if the results are favorable. The City is not in favor of increasing the risk of property loss or endangering its residents in this regard, and fully supports the thorough examination of these impacts.
FRM10	Local discussions about Allatoona Lake levels seem to not focus on fact that Allatoona is a flood control reservoir. Water supply for ever growing population is important, but not the primary reason for Allatoona. Metro Atlanta needs to consider more reservoirs for water supply. The lake should be below full pool for flood control all year with few fluctuations.
FRM11	Stronger flood easement enforcement is needed at Weiss Lake. Currently, the easements are filled with RVs and campers that are more permanent than movable. Once a year, the RVs and campers should be removed from their location. This will prevent the permanent campers that have been in the easement for years and to the point that they cannot be moved if a flood is coming. This will not be popular, but the guidelines call for it and they need to be enforced.
Hydropower (HP)	
HP1	Georgia's 2018 water supply request fails to include "made inflows" into its calculation of hydropower generation losses at Allatoona Lake. (ALOWR)
HP2	The legislative history for the Allatoona project clearly demonstrates that it was authorized for hydropower production, flood control, and navigational support. Specifically, Congress authorized the construction and operation of the Allatoona project in the Flood Control Act of 1941 "in accordance with the recommendation of the Chief of Engineers in House Document Numbered 674, Seventy Sixth Congress, third session…" (SeFPC)
HP3	APC relies on the upstream flows from the Allatoona and Carters projects in determining how much flow it may depend on to generate electricity from its hydroelectric dams in order to assure that the electricity needs of its customers are met. USACE has estimated that, for every kilowatt hour of electric energy generated at the Allatoona project, three additional kilowatt hours are generated at the downstream power plants. Accordingly, lower flows from reduced hydro-generation at the Allatoona project result in reduced hydro-generation at APC's Weiss project and the other APC projects downstream on the Coosa River. (APC)
HP4	The USACE should consider the potential impacts of water supply operations on downstream hydropower generation. The USACE analysis of hydropower operations should consider the potential increasing value of hydropower generation in the future, including forecasted energy prices available from the Southeastern Power Administration (SEPA). USACE should also examine impacts to hydropower during seasonably sensitive times when low flows could have the most severe impacts on hydropower value. (APC)
HP5	If Georgia draws more water from the water supply of the Coosa River, it leaves less available water in Alabama lakes for hydropower and other uses.

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment
Navigation (NV)	
NV1	Any analysis of Allatoona water supply operations should take impacts to navigation into account. Navigation is not only a primary authorized purpose of the USACE projects in the ACT River Basin; it is also historically important for commerce in Alabama. Historically, commercial navigation supported timber, wood products, mining activities, and agriculture, peaking at 4.1 million tons in 1986. (APC)
NV2	Provide better markers to navigate the river channel in Weiss Lake.
Water Management Practices/Recommendations (WM)	
WM1	Recommend that the USACE include information regarding how the proposed modification to the winter pool levels at the Weiss and Logan Martin may affect downstream flows in the Basin and impact the overall operations of the preferred alternative. (USEPA)
WM2	The storage capacity needed to support average annual withdrawals of 94 mgd will depend upon the assumptions the USACE makes about the storage accounting rules USACE will apply at Allatoona Lake. Those assumptions include: (1) how to account for "made inflows" and (2) other storage accounting issues. Made inflows are flows allocated by the State of Georgia to CCMWA and include both releases made by CCMWA from Hickory Log Creek Reservoir and return flows of treated wastewater into Allatoona Lake or its tributaries on behalf of CCMWA. Consistent with Georgia law, USACE should credit 100% of these made inflows directly to CCMWA's storage account (provided CCMWA has available storage space). Other storage accounting issues include decisions as to when CCMWA's and Carterville's accounts reset to full and the percentage of inflows (separate from made inflows) to which CCMWA and Cartersville are entitled. USACE should consider and resolve these outstanding storage accounting issues as part of the Reallocation Study when determining how much additional storage USACE must reallocate to meet Georgia's 2050 needs. Resolving these issues is a critical first step because it is possible that if USACE credits made inflows to CCMWA and resolves the other storage accounting issues as specified in the Updated Request, CCMWA may not need any additional storage to meet its projected 2050 demand. (GAEPD)
WM3	Evaluate an alternative that corrects the USACE storage accounting rules at Allatoona Lake, which have been disputed since 2007 when USACE first proposed them. These accounting rules are the subject of separate litigation by CCMWA. USACE has acknowledged that disputes regarding storage accounting at Allatoona Lake and the treatment of water released from storage in Hickory Log Creek Reservoir were not addressed in 2015 update to the ACT Master Manual and need to be resolved. (WSP)

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment
WM4	USACE storage accounting rules deny CCMWA credit for made inflows to Allatoona Lake from two sources: (1) engineered return flows from two water reclamation facilities and (2) water released from storage in the Hickory Log Creek Reservoir for transfer to CCMWA storage account in Allatoona Lake. This position effectively preempts CCMWA state-granted water rights. Pursuant to Georgia law, the State has granted CCMWA the exclusive right to impound and withdraw certain made inflows to Allatoona Lake Without either acknowledging CCMWA's water rights or explaining the USACE legal authority to allocate water in direct contravention of an allocation by the State of Georgia, the storage accounting rules allocate all inflows to the reservoir *pro rata* based on each user's percentage of conservation storage at full summer pool. Because CCMWA owns 4.61 percent of the conservation storage at full-summer pool, USACE allocates CCMWA 4.61 percent of any inflows to the project. The effect of the USACE rule is to deprive CCMWA of 95.39 percent of the made inflows granted to it by the State of Georgia and to transfer that water instead to other users (most notably, the USACE itself). Recognizing the right to use made inflows consistent with state law is also good policy. Doing so will encourage return flows and reduce consumptive uses of water; allow water users to integrate storage in existing federal reservoirs into their water supply systems by providing the ability to transfer water among projects, while protecting the water rights needed to meet growing water supply demands; and maximize the use of existing infrastructure, thereby avoiding needless environmental and economic impacts from constructing unnecessary and redundant projects to access this same water. (WSP)
WM5	The current storage accounting rules incorrectly define the conservation storage at Allatoona Lake by ignoring the rule curve adopted in the ACT Master Manual and the resulting seasonal variations in the volume of the conservation pool. USACE should conform the storage accounting rules to the ACT Master Manual by recognizing that the rule curve defines conservation storage in Allatoona Lake and, accordingly, that all user accounts located in the conservation pool must be full whenever the reservoir is at or above the rule curve. Water supply storage held by CCMWA and the City of Cartersville is in the conservation pool. USACE also agrees, as it has previously recognized, that all storage accounts must be full whenever conservation storage is full. This is a matter of common sense and physics, because if a void exists in any portion of any water supply storage account, that same void must also exist within the conservation pool. Yet the USACE storage accounting rules regularly show CCWMA's account as being "empty" at times when the reservoir is above the rule curve, the conservation pool is full, and the project is in flood operations. This error is the result of the storage accounting rules' failure to acknowledge the rule curve and the seasonal variations in conservation storage. (WSP)
WM6	USACE should correct the formula used to allocate inflows *pro rata* so it reflects each user's actual share of conservation storage under the rule curve. The USACE storage accounting rules fail to acknowledge the rule curve and the seasonal variations in the volume of conservation storage. Specifically, the current accounting rules purport to assign inflows *pro rata* based on each user's share of the conservation storage pool. In making this calculation, the rules incorrectly use a fixed volume of conservation storage corresponding to the volume of conservation storage at full summer pool, when in fact the volume of conservation storage varies dramatically. (WSP)
WM7	The effects of the errors in the USACE storage accounting rules are significant. The errors deprive users of a sizable portion of the yield to which they are entitled and have significant implications for the WSP. In fact, if the USACE storage accounting rules are corrected per specific comments provided by the WSP, CCMWA will not require any additional storage capacity in Allatoona Lake because the yield of its existing storage will suffice to meet its year 2050 projected needs. (WSP)

Summary of Scoping Input

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Number	Scoping Comment
WM8	USACE must not adopt Georgia's proposed return credits and storage accounting system. USACE should adhere to its longstanding practice of proportionally crediting return flows to the storage accounts of all users, regardless of source. This system reflects a logical, time-tested approach. This system continues to provide predictability to both USACE and water users during periods of drought and will ensure that all authorized project purposes are consistently and equitably met. USACE's retention of its current approach is prudent because individual users' return flows can be uncertain, meaning that projecting future inflows from individual users can be a guessing game. This reflux of water is subject to social, economic, environmental, political, and other conditions that factor in to how (and where) users consume, store, and allocate their water. (ALOWR)
WM9	APC relies on flows from the Allatoona project to meet certain downstream flow obligations and commitments for navigation, species conservation and protection, water quality, municipal and industrial use, and recreation. (APC)
WM10	While APC's Tallapoosa projects are not directly downstream of any USACE projects, reduced flows in the Coosa River increase demands for additional releases from APC's Tallapoosa projects to support flows on the Alabama River. (APC)
WM11	APC's proposed revisions to the flood operation plans for the Weiss and Logan Martin projects include revising the Weiss and Logan Martin rule curves to raise the winter pool levels and to lower the upper limit of the induced surcharge operations at each reservoir. The current WCMs for both reservoirs contain surcharge curves with elevations higher than the respective flood easements acquired by APC and approved by FERC following consultation with USACE in the context of the original licensing of the upper Coosa River. APC is concerned that USACE has not accurately represented its proposed changes at Weiss and Logan Martin. Materials presented at the USACE public scoping open houses suggested that APC proposed to reduce actual flood storage in the winter and summer. While there is a reduction of flood storage at both projects in the winter due to an increased winter pool, there would be no reduction in the flood storage during summer pool periods compared to current baseline operations at Weiss and Logan Martin. APC is not proposing to change existing easements at either project. APC and USACE have both long recognized that surcharge curves at both projects do not reflect the best flood control operations in light of the FERC-approved and USACE-concurred flood easement elevations at the two reservoirs. (APC)
WM12	Some portion of the water supply withdrawals made from the Upper Coosa in Georgia are returned to the Chattahoochee River basin rather than to the Coosa River Basin. Any reallocation study should consider the extent of any interbasin transfers out of the Upper Coosa Basin that result from any water supply operations at Allatoona or the Richland Creek Reservoir. Interbasin transfers out of the Coosa Basin will further harm downstream flows. USACE must consider any such impacts in its analyses. (APC)
WM13	Make sure the man-made inflows back into Allatoona Lake are made part of the storage reallocation study. The study should recommend a water storage accounting methodology that accounts for man-made inflows to Allatoona Lake. All withdrawals by CCMWA should be offset gallon for gallon by wastewater return flows and releases into Allatoona Lake by Hickory Log Creek Reservoir. Establish a consistent nation-wide policy for accounting for man-made releases.
WMI4	With today's accurate and constantly improving weather forecasting capability, APC can proactively manage lake levels to mitigate extreme flooding and drought possibilities at all times of the year. APC has demonstrated that capability over the past few years when granted temporary variances to raise lake levels by 2 feet to address drought situations. Effective flood and drought control can be achieved in the future without having to rely on huge lake water level buffers. The USACE continually strives to improve water management technology or to utilize the best available information.

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment
WM15	Weather forecasting today is much better than it was 50 years ago. USACE and APC operators can drop these lakes much quicker and can manage them more efficiently.
WM16	Technology investments in water management and weather forecasting should be mandatory for all agencies/companies involved in local, state and federal water management practices. For example, APC should invest in automated water level monitors at many points in the Coosa River (not just at the dams) and at all major tributaries of the various lakes. Then use improved modeling software to allow the collected data to be proactively used. Other agencies should be investing in weather forecasting and how to coordinate population/business growth with potential water usage/needs. Coordinated National and State water management programs are critical to prevent future water management crisis.
WM17	The Etowah River Channel Capacity cap should be restored to 12000 cfs. Within this overall context, the cost to purchase a handful of Cartersville area flood easements would be insignificant compared to the added flood discharge flexibility from the added 3000 cfs from 9000 cfs.
WM18	The Allatoona Lake Rule Curve should be further revised to extend its Zone 2 at 840 into November.
WM19	USACE should work with SEPA, CCMWA, and Cartersville to develop seasonal market-based power and water supply pricing formulas. Each of those utilities charge their end users on an inverted price schedule, and USACE should apply a similar approach considering the much higher value of summer water and power.
WM20	Raise winter pool levels by 3 feet in Weiss Lake.
WM21	Rather than release more water to the Gulf in winter, retain more water in Weiss and Logan Martin lakes in case drought conditions are encountered the following spring and summer. More water in Weiss and Logan Martin would allow the flow out of Georgia to slow down some.
WM22	APC does an excellent job in controlling the water levels (on Weiss Lake) and the new proposal to raise the winter pool level would not be a problem for them.
WM23	Logan Martin Lake is normally kept at elevation 459 feet, sometimes at 458 feet, and is rarely kept at elevation 460 feet.
WM24	Lower the winter levels of Lay, Mitchell, and Jordan lakes by one foot and raise the level of Weiss and Logan Martin lakes by three feet.
WM25	Lower winter water levels at lakes below Logan Martin to offset allowing winter levels to be raised on Logan Martin Lake.
WM26	Concerned about low flow in Neely Henry Lake (APC) and potential lower lake levels due to increased withdrawal and usage of water by the Atlanta area.
WM27	Thoroughly examine impacts on the Tallapoosa River Basin since the ACT is operated as a unified system, changes on the Coosa River will impact the Tallapoosa River.
WM28	Do not drop water level (at Weiss Lake) by six feet in winter, or at least do not drop levels by six feet until the end of November each year. Weiss Lake levels are dropped too low and too fast in the fall.
WM29	During some seasons of the year, the flow in the Coosa River is reduced as the level of Allatoona Lake is held up at a higher elevation for recreational purposes. We are concerned that the lower flows can impact Neely Henry, Weiss, and other reservoirs.

Summary of Scoping Input

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Number	Scoping Comment
WM30	Delay the drawdown (at Weiss Lake) until October 1st and raise the pool faster in the spring. Prefer a minimum drawdown; for example, no drawdown for two years, and then the third year, draw it down so people can get on land and work on their docks and perform other maintenance.
WM31	Increase the winter pool level for Logan Martin by 2 feet to elevation 462. The 2 extra feet will have enormous benefits to the many people that reside on the lake and for non-property owners that use the lake for recreational purposes year-round. Logan Martin has many large shallow areas that are inaccessible when the lake is at winter pool level of 460 ft. Raising the winter level by 2 ft. will allow most of these shallow areas to be used year-round by the residents that call Lake Logan Martin home.
WM32	Consider increasing the Allatoona Lake summer pool by two feet and reducing the drawdown for the winter pool to eight feet.
WM33	Individual expressed concern about flooding impacts experienced two years ago (2016) at Weiss Lake. Water was not released quickly enough from Weiss Dam to preclude flooding.
WM34	In April 2017, Weiss Lake was dropped two and a half feet in the middle of the spawning season for crappie, exposing all the fish eggs. This drawdown also occurred during a fishing tournament, causing economic impact. Concern was expressed about APC lake management policies and practices during fish spawning season each year.
WM35	APC should publish a schedule during fall drawdown so that the public knows when the pool will be dropped to various levels of drawdown and can better prepare to minimize impacts on their activities.
WM36	Weiss Lake storage is being impacted by heavy siltation from tributaries. Recommend consideration of dredging to restore storage capacity and access to restricted areas on the lake.
WM37	Raise the winter pool on Weiss Lake if it does not increase flood risk in the winter.
WM38	Commenter expressed concern about the amount of water that would be drawn out of Allatoona Lake and the impact on downstream flow (at Weiss Lake), both the quality and the quantity of the flow of the Coosa River, and how may affect the area economically and environmentally.
WM39	Increases in water withdrawals at Allatoona Lake should be matched with increase in wastewater returns.
WM40	We should not cause adverse effects to one lake (Weiss) and the Coosa River by making additional lakes (presumed reference to Richland Creek Reservoir).
WM41	Do not concur with Georgia taking more water and affecting the water quality and lake levels in Alabama lakes.
WM42	Since the pool level on Neely Henry is staying higher in the winter, more weeds and grasses are present. The tall grass is a deterrent for swimmers and boat propellers. Consider lowering the pool by an additional amount for a brief period in the winter months to deter weed growth.
WM43	Allatoona Lake levels have been raised for recreation, resulting in reduced Coosa River flows. Historically, flows have been dropping for the last 20 years, under all conditions.
WM44	Increase the winter pool level at Logan Martin Lake to elevation 462 feet.
WM45	Raise water levels in Allatoona Lake during all months. Store additional water during winter months to meet the water needs of both Georgia and Alabama. Maintain or raise the full pool levels during peak recreation months.

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Number	Scoping Comment
WM46	Concern expressed that Allatoona Lake levels could be lower as much as six additional feet because of the request for additional water supply withdrawals.
WM47	Maintain a more consistent level at Allatoona Lake instead of drawing down during the winter months.
WM48	Implement a dredging operation year-round. This will allow for more storage capacity to be used for flood control, plus generation, water supply, and recreation.
WM49	The recent change at Allatoona Lake to move the planned drawdown to October 1 was a good move. Move the drawdown to a later date near year's end.
WM50	Consider leaving Allatoona Lake at full pool year-round or at least only draw down between January and March.
WM51	The ACT study to reallocate Allatoona's watershed is an ill-advised idea. What is needed is another reservoir between Allatoona and Weiss that can catch Allatoona's winter run-off and mid-season releases in greater abundance and better regulate the rest of the system downstream. Reapportionment or reallocation of storage for water supply is a temporary stop gap measure.
WM52	Maintain the same pool level at Weiss Lake year-round. This would improve fish habitat, boating, and property values.
WM53	Support the APC proposal to lower the top of the flood storage to 473.5 in lieu of 477. APC has continued to improve flood management techniques technologies and there have been no excursions into the flood easement in more than two years even with starting lake levels near full pool and sustained heavy rains upstream.
WM54	Consider changes to the Zone 4, as presented in Section 7 of the current Water Control Manual for Allatoona Lake, while holding the other zones as currently ordered by the water control manual published in 2015 to compensate for any additional water diversion from the lake and/or Etowah River.
WM55	Consider implementing a higher low pool elevation for the duration of the extended window if USACE proposes to change the full pool window via an earlier drawdown or later refill. If USACE proposes to implement a new lower low pool elevation, then it should only occur during a shorter window (i.e. the full pool lasts longer).
WM56	Allatoona Lake is drawn down 17 feet below summer pool level at the lowest point in winter. Do not allow the lake to be drawn down any lower than that. The Allatoona Yacht Club has big docks and big boats and floating houses. They must get pushed further into the lake when water level goes down. If the water level was to go down further than the 17 feet, we could have boats and floating houses sitting on rocks. We would have to push them out further, which would decrease the enjoyment of our members. We just want to make sure the water levels do not go any lower in the winter than it does now.
WM57	Recommend dropping Allatoona Lake by no more than 12 feet in the winter months.
WM58	Consider increasing Allatoona Lake levels by two to three feet year-round. USACE should be able to continue to operate for flood risk management and keep the lake higher for recreational use.

Summary of Scoping Input

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Number	Scoping Comment
Water Quality (WQ)	
WQ1	Recommend that USACE ensure that the Water Control Manual operations meet water quality standards including downstream uses. (USEPA)
WQ2	Downstream impacts to water quality in Alabama are of particular concern. USACE has an obligation under the Clean Water Act and its own regulations and guidance to protect downstream water quality. Historic measurements of chlorophyll *a* in Weiss Lake show that the nutrient standards for Weiss Lake have been exceeded during several years, particularly during drought years. In 2004, the USEPA approved a Total Maximum Daily Load (TMDL) for nutrients in Weiss Lake. USEPA determined the source of the nutrients and eutrophication levels in Weiss Lake were nonpoint source discharges originating mostly in Georgia. Four reservoirs in the Coosa River downstream from Weiss Lake (Lake Neely Henry, Lake Logan Martin, Lay Lake, and Lake Mitchell) have also been identified by the Alabama Department of Environmental Management (ADEM) as impaired by nutrients. Decreasing either the amount or quality of inflow from Allatoona to Weiss Lake can only exacerbate the nutrient issues in Weiss Lake, which will in turn deplete DO further, making it more burdensome for APC to ensure DO at or above 4 mg/l in the tailrace at Weiss during generation. The USACE should evaluate whether any water supply operations at Allatoona Lake will interfere with attainment of downstream water quality standards. (APC)
WQ3	The proposed water supply request (at Allatoona Lake) will further reduce flows in the ACT basin causing a variety of environmental concerns and impacts to the Montgomery Water Works and Sanitary Sewer Board (MWWSSB) and others in Alabama. This harm includes the overall degradation of water quality, impairment of the Montgomery Board's ability to adequately treat wastewater, and impairment of the Board's ability to conduct and rely upon long range planning and analysis. (MWWSSB)
WQ4	Further reductions in water flow may occur that will further affect the MWWSSB's cost to comply with its National Pollutant Discharge Elimination System (NPDES) permits. (MWWSSB)
WQ5	Any withdrawn Allatoona water should be returned to the Lake at a higher quality than that withdrawn.
WQ6	We are especially concerned with how water quality (at Allatoona Lake) may be impacted in the future. The large outflows, inflows, and fluctuations to the lake are all problematic to the quality of the water in the lake. Once the water quality falls apart, all the other authorized purposes of the lake become compromised. It is paramount that the quality of the water be maintained with the limitations of massive inflows and outflows. Any change to the Allatoona Lake water manual must carefully consider the impact to water quality (in Allatoona Lake).
WQ7	Clean water is very important (at Weiss Lake) and must be maintained.
WQ8	APC cannot be trusted to manage the water (in Weiss Lake) in an environmentally friendly state or we would not be where we are today. APC has allowed raw sewage from the town of Cedar Bluff to be dumped into the lake for years. They know about it, everybody in the area knows about it, and they know it happens when the town sewage system has an overflow.
WQ9	Have some serious concerns that water quality on Weiss and Neely Henry has dropped tremendously. The serious issues with water quality are due to inadequate flow to Weiss Lake from Georgia reservoirs (Allatoona, Hickory Log, etc.).
WQ10	Concerned about the pollution entering Weiss Lake from Georgia, including the carpet mills and the other different pollutants coming down the Coosa River into Weiss Lake. This has been a problem for years.

Summary of Scoping Input

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Number	Scoping Comment
WQ11	Higher winter pool levels at Weiss and Logan Martin will benefit water quality – more water equals dilution of pollution.
WQ12	Individual concerned about water quality at Weiss Lake, specifically warnings to not eat the fish due to high polychlorinated biphenyl (PCB) content and a standing order for "swim at your own risk" due to contamination from a flesh-eating disease that a person got last year. The source of the disease is not clear if the disease is coming from people who are not maintaining their RV (recreational vehicle) disposal tanks on their RV lots. Not clear if this proposal would make conditions worse.
WQ13	Water quality (e-coli) is way out of allowable levels – 400 times allowable levels at Allatoona Lake. The data is available. What is the USACE plan to address this issue?
WQ14	Concerns expressed about the effects of lower water levels in Allatoona Lake on water quality in the lake.
WQ15	Consider assessing the water quality impact to any changes proposed. Like south Florida, if anything catastrophic happens to the waters in Allatoona Lake, the impact will be felt throughout the entire ACT River basin.
WQ16	Water quality on Weiss Lake is the major concern that should be addressed in your study. Water quality will be improved with: 1) more water in the lake, especially in the winter. Winter water level should be raised to 561; 2) no reduction in the easement elevation, as doing so would reduce wetlands that filter water into the lake.
WQ17	Water quality in Allatoona Lake may suffer with longer pool retention, lower flood levels, longer recreation time, and lower “flush” frequency,
Biological Resources (BR)	
BR1	Recommend that USACE provides adequate downstream flows to maintain the physical integrity of the habitat. (USEPA)
BR2	Actively engage the U.S. Fish and Wildlife service on issues related to the protection of threatened and endangered species. (USEPA)
BR3	Reduced outflow from the upstream USACE projects could also impact threatened and endangered species in the Coosa River below Weiss Dam. (APC)
BR4	Protection of fish and other wildlife in the Etowah and Oostanaula Basins is important relative to minimum and maximum flows.
BR5	Concerns expressed about the effects of lower water levels in Allatoona Lake on eagles and osprey.
BR6	A higher winter level at Weiss Lake would benefit Cherokee County along with the surrounding areas by providing a better quality of habitat for both fish and wildlife in and around the lake.
BR7	The Weiss Lake fishery has never recovered after the last drought. The crappie catch has decreased.
BR8	Reduced flows will result in more vegetation encroaching in Weiss Lake and downstream reservoirs, some of which is invasive species. Reduce flows affects some of the protected species as well. Also, when the flow is impacted, it will affect the extent of bacteria in the water.
BR9	Higher winter pool levels at Weiss and Logan Martin will benefit fish and wildlife habitat.
BR10	More water supply withdrawals because of Georgia’s request would impact Weiss Lake, causing it to go stagnant and experiencing more fish kills than currently occur, especially during low rainfall periods.

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Number	Scoping Comment
BR11	Concerns expressed about the effects of lower water levels in Allatoona Lake on fish habitat in the lake.
BR12	Lower lake levels in Allatoona Lake results in increased temperatures, depletion of oxygen levels in the water, and distress for fish and other aquatic wildlife, perhaps even fish kills. These conditions may also promote algae blooms.
BR13	Do not reduce the flood plain easement at Weiss Lake; it needs to stay at 574 to protect the wetlands.
Recreation Resources (REC)	
REC1	USACE should consider potential impacts to recreation interests downstream as part of any Allatoona water supply analysis. APC's downstream lakes, from Weiss Lake to Jordan Dam, provide valuable recreational opportunities. The recreational value of APC's projects largely depends on elevation and available flows. Increased water supply operations could negatively impact lake elevations and flows, particularly during the peak recreational season. USACE should fully disclose any such potential impacts and any related economic impacts. USACE consideration of recreation impacts should also not favor recreation at Allatoona over recreation at APC's lakes downstream. (APC)
REC2	During winter draw down at Weiss and Logan Martin lakes, many lake access boat ramps are dry and unusable, most coves and creeks are blocked from the river without access due to low water and sedimentation.
REC3	The State's use of "average" water level conditions to present its case is misleading at best and possibly an intentional misrepresentation of facts. Refer to the State's 2013 application as a precedent in reaching this opinion. In that submittal, the State hid the likelihood that Allatoona Lake's recreational season water levels would be decrease by many feet by submitting that "average" conditions would be minimal with hardly any impact on recreational uses. Their latest submittal repeats this misleading pattern and does not identify what the water level drawdowns would be under adverse drought conditions.
REC4	Increase in the winter pool at Logan Martin Lake would provide easier and more frequent access to the lake and would improve the sport fishing at the lake at more desirable fishing times.
REC5	Current Weiss Lake winter pool levels impact boat use and limit access to coves.
REC6	Under current winter pool level condition at Weiss Lake, the three boat ramps that the county operates below the Lock and Dam (Mayo's Bar) are basically inaccessible and unusable.
REC7	Raising winter pool levels at Weiss Lake will make more of the lake accessible, allowing more uses of the lake. Higher winter water levels will introduce more possibilities of waterfowl hunting, increasing visitors to the lake and boosting local businesses and the local economy.
REC8	Raising the winter pool at Logan Martin Lake would provide a better and longer use period for recreational use and a safer experience.
REC9	The Cherokee Allatoona Waterfall area (a poorly managed USACE "party" area), is worse during higher lake levels. Seeking closure of this area until USACE can manage/monitor properly with rules and postings, no motors in swim area, no guns, fires, disorderly conduct, trespassing, camping, trash/littering, and drugs. This area could be great with host/manager living there.

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Number	Scoping Comment
Socioeconomic Resources (SR)	
SR1	Consider impacts to affected communities including low-income and minority populations. (USEPA)
SR2	The NEPA analysis requires proper consideration of socio-economic impacts. While the NEPA analysis will require consideration of panoply of Federal laws of which many are directed at underlying environmental impacts, NEPA also requires USACE to consider the socio-economic impacts associated with a proposed action. With the reallocation of storage, the loss of hydropower and related pricing of storage remain important considerations for the scope of the NEPA review for the study of reallocating storage. Because Congress specified that the Allatoona project would generate hydropower, the scope of the NEPA study must include an analysis of impacts associated with the loss of hydropower that will occur with the reallocation of storage. Furthermore, the pricing of storage must at a minimum reflect the loss of the hydropower benefits that are provided by the Allatoona project. The proper scope of socio-economic impacts should specify the amount of OMRR&R expenses which will be borne by water supply and no longer assigned to hydropower. In this regard, the study should recommend the proper adjustment of the cost allocation studies to ensure that joint costs are appropriately shared by the authorized project purposes at Allatoona Lake. (SeFPC)
SR3	Request a longer season of higher water (at Weiss Lake). Tourism related to the lake is important to Cherokee County.
SR4	Higher winter pool at Weiss Lake would help small boat navigation and reduce damage to watercraft.
SR5	Recreation is important, and lower (winter) water levels (at Weiss Lake) and less water supply would impact recreation.
SR6	Concerned about the effects of lower water levels in Allatoona Lake on use of boat docks and marinas.
SR7	Concerned about the effects of lower water levels in Allatoona Lake on property values around the lake.
SR8	Sloughs on Logan Martin Lake are mud flats at winter pool. Increasing the winter pool by two feet would substantially raise property values in these areas.
SR9	At current winter pool levels, people with four wheelers ride on the Logan Martin Lake bed and stir up/disrupt the lake bed, disrupting property owners and causing environmental damage.
SR10	Increase in winter pool level at Logan Martin Lake would improve the economy of all the business associated with the lake.
SR11	Increasing the winter pool level at Weiss Lake would benefit Cherokee County along with the surrounding areas by increasing tourism, recreational activities, and tax revenue.
SR12	Sufficient flow from Georgia is a concern downstream in Alabama. Gadsden is so dependent economically on the Coosa River, with fishing and the tournaments and the businesses. Reduced flows would have an enormous impact economically and the quality of the water would be affected.
SR13	Higher winter pool levels in Weiss Lake would improve conditions for businesses in Centre and increase business revenue and tax revenue. Full year recreation access would be a significant benefit to local businesses.
SR14	Reduced flows to Weiss Lake resulting from increased upstream withdrawals at Allatoona Lake would have a negative effect on safe use of the lake, community water supplies, tourism, and the local economy in general.
SR15	Cherokee County (Alabama) relies on revenue collected through tourism. Weiss Lake and its resources need to be protected.

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Number	Scoping Comment
SR16	Concern expressed about potential effects of increased withdrawals at Allatoona Lake on lake levels, property values, and recreation on the lake.
SR17	The proposed plan to take water from Allatoona Lake and lower lake levels will have far-reaching economic impacts in this area.
SR18	Further lowering lake levels at Allatoona Lake because of increased water supply withdrawals would further increase the adverse impacts on boat access and property values around the lake.
SR19	Further reduction in Allatoona Lake levels will impact the economics of the region. Less water means less recreation, impacting several counties surrounding the lake.
SR20	Modification of the winter pool level at Logan Martin Lake would have a decidedly positive impact on property values, as many buildable lots and existing homes would gain access to year-round water.
Other Environmental Resources (OR)	
OR1	Need a plan better control rubbish, trash, and litter that gets dumped into Weiss Lake.
Data/Models and Studies (DS)	
DS1	Recommend further consultation with USEPA regarding modeling efforts prior to the development of the SEIS. (USEPA)
DS2	Georgia's ResSim model analysis should be reconstructed to include drought and non-drought runs. No changes from the "made inflow" concept seem to have been incorporated into Dr. Zeng's model analysis, although this cannot be determined absent Georgia EPD's model or their supporting data. Alabama hereby requests the opportunity to attempt to re-create Dr. Zeng's results when accounting for these various withdrawals and discharges. (ALOWR)
DS3	Georgia's model analysis in support of their water supply request does not account for reduced state line flow from Georgia to Alabama. Dr. Zeng's analysis attempts to portray how little the state line flow from Georgia to Alabama would be decreased by its March 2018 water supply request, measuring the decrease in cubic feet/second and then providing the long-term average flow at the state line for context. However, this calculation is misleading in that the long-term average flow rate is not representative of flow rate during a serious drought. USACE needs to carefully create the proper baseline conditions and scenarios to model in order to properly evaluate Georgia's water supply request and its effect on the flows at the Alabama-Georgia state line. These conditions must be shared with Alabama to ensure that the critical issues identified above are properly considered. (ALOWR)
DS4	APC understands that USACE intends to include the new Richland Creek Dam as either part of the NEPA baseline or the USACE impact analysis. USACE should clearly explain how it intends to do so. Richland Creek operations in combination with Allatoona water supply operations could exacerbate downstream harm to Weiss Lake and the Coosa River in Alabama. USACE must thoroughly consider any such impacts. (APC)
DS5	Closely examine the downstream water quality issues identified by the MWWSSB with reliable modeling and tools and fully evaluate the impacts of the pending water supply request. (MWWSSB)
DS6	Please ensure that modeling considers the actual withdrawals by CCMWA in developing a baseline for comparison.

Summary of Scoping Input

Integrated Allatoona Lake Water Supply Storage Reallocation Study and Updates to the Weiss and Logan Martin Reservoir Project Water Control Manuals, and Supplemental Environmental Impact Statement (SEIS)

Acronyms and Abbreviations

ACT – Alabama-Coosa-Tallapoosa
ADEM – Alabama Department of Environmental Management
ALOWR – Alabama Office of Water Resources
APC - Alabama Power Company
CCMWA – Cobb County-Marietta Water Authority
DO – Dissolved Oxygen
DOJ – U.S. Department of Justice
EA – Environmental Assessment
EIS – Environmental Impact Statement
FERC – Federal Energy Regulatory Commission
GAEPD – Georgia Environmental Protection Division
M&I – municipal and industrial
mgd – million gallons per day
MNGWPD – Metropolitan North Georgia Water Planning District
MWWSSB – Montgomery Water Works and Sanitary Sewer Board
NEPA – National Environmental Policy Act
NPDES – National Pollutant Discharge Elimination System
PCB – polychlorinated biphenyl
RV – recreational vehicle
SeFPC – Southeastern Federal Power Customers, Inc.
SEIS – Supplemental Environmental Impact Statement
SEPA – Southeastern Power Administration
TMDL – Total Maximum Daily Load
USACE – U.S. Army Corps of Engineers
USEPA – U.S. Environmental Protection Agency
WSA – Water Supply Act (of 1958)
WSP - Water Supply Providers (Georgia)