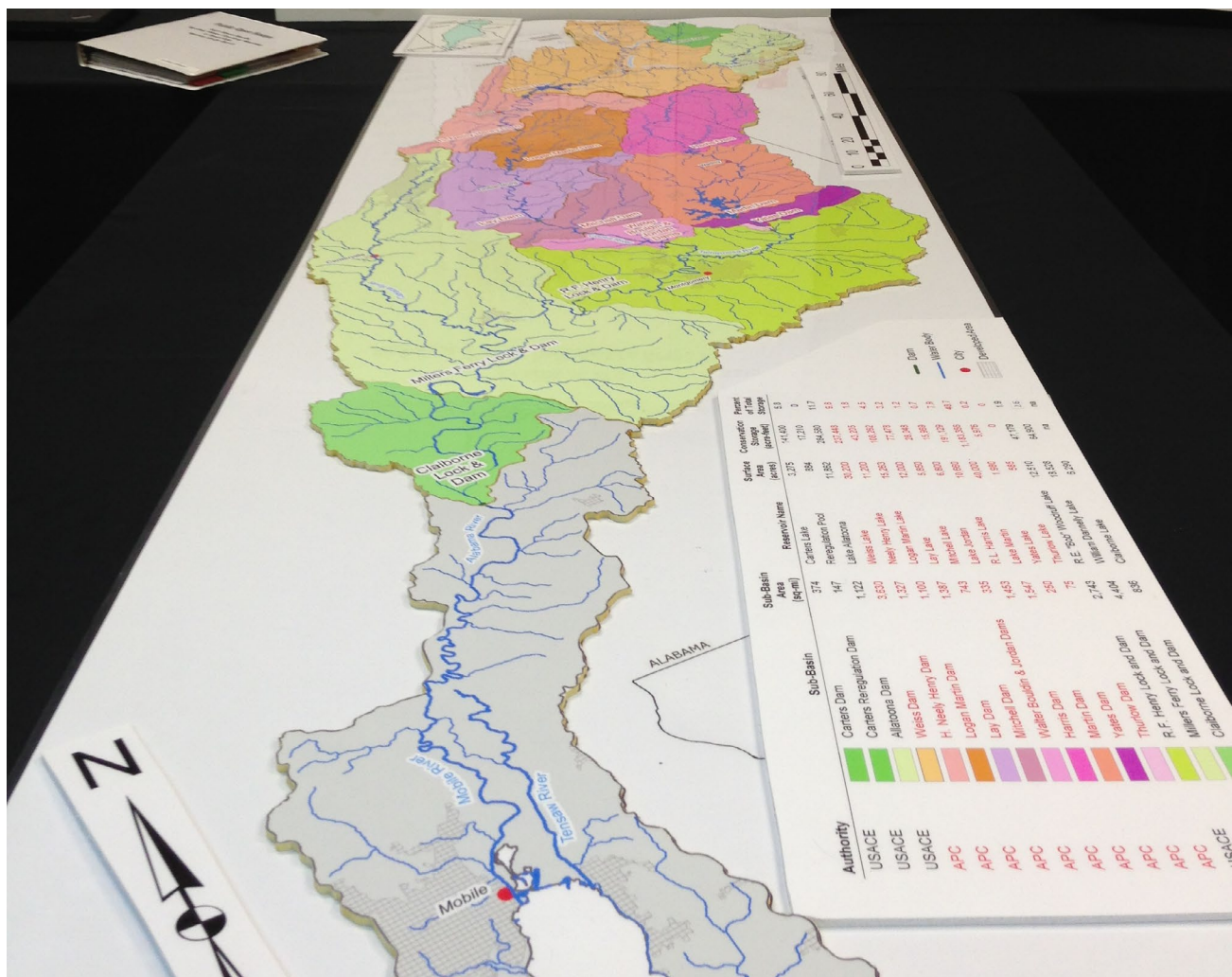


Final Public Scoping Report

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

September 2018



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EXECUTIVE SUMMARY

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

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

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

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

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

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

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

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ACRONYMS/ABBREVIATIONS

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

1.0 INTRODUCTION

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

1.1 BACKGROUND

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

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

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

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

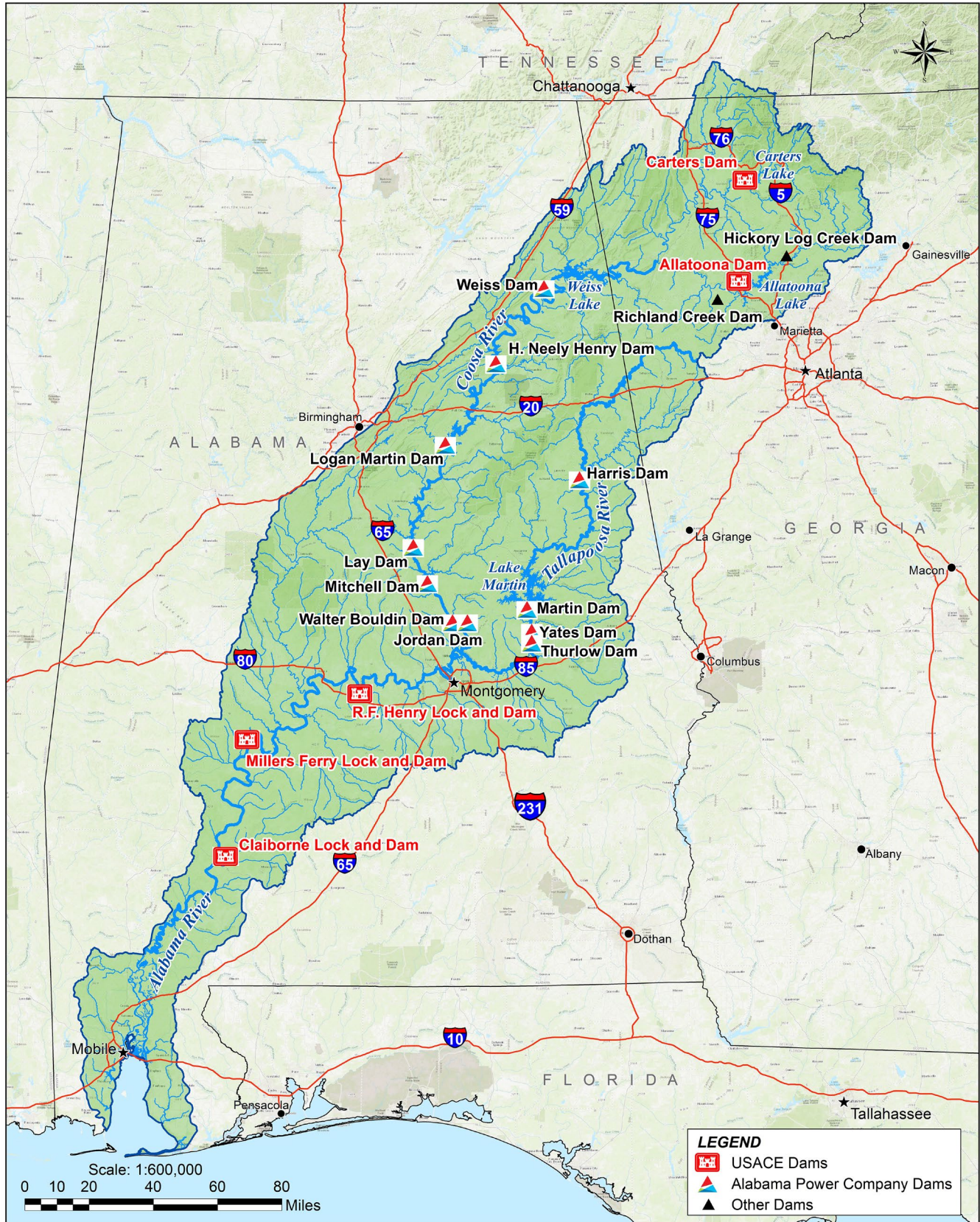


Figure 1-1. Alabama-Coosa-Tallapoosa River Basin.

1.2 PURPOSE AND NEED

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

The purpose of this study is to:

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

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

2.0 SCOPING PROCESS

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

2.1 NOTICES OF INTENT

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

2.2 PUBLIC NOTICES

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

2.3 AMERICAN INDIAN TRIBAL CONSULTATION

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

Table 2-1. American Tribes that Received Notification Letters

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

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

2.4 INTERAGENCY MEETING

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

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

2.5 PUBLIC SCOPING MEETINGS

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

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

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

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

Table 2-2. Participants by Scoping Meeting Location

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

2.6 INTERACTIVE CANVASSING

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

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

Table 2-3. Interactive Canvassing Participation

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

Note:

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

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

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

Table 2-4. Scoping Meeting Participants' Most Important Environmental Resources

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

Note:

^a Resources added by participants.

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

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

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

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

2.7 SCOPING COMMENTS

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

Table 2-5. Comments Received

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

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

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

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

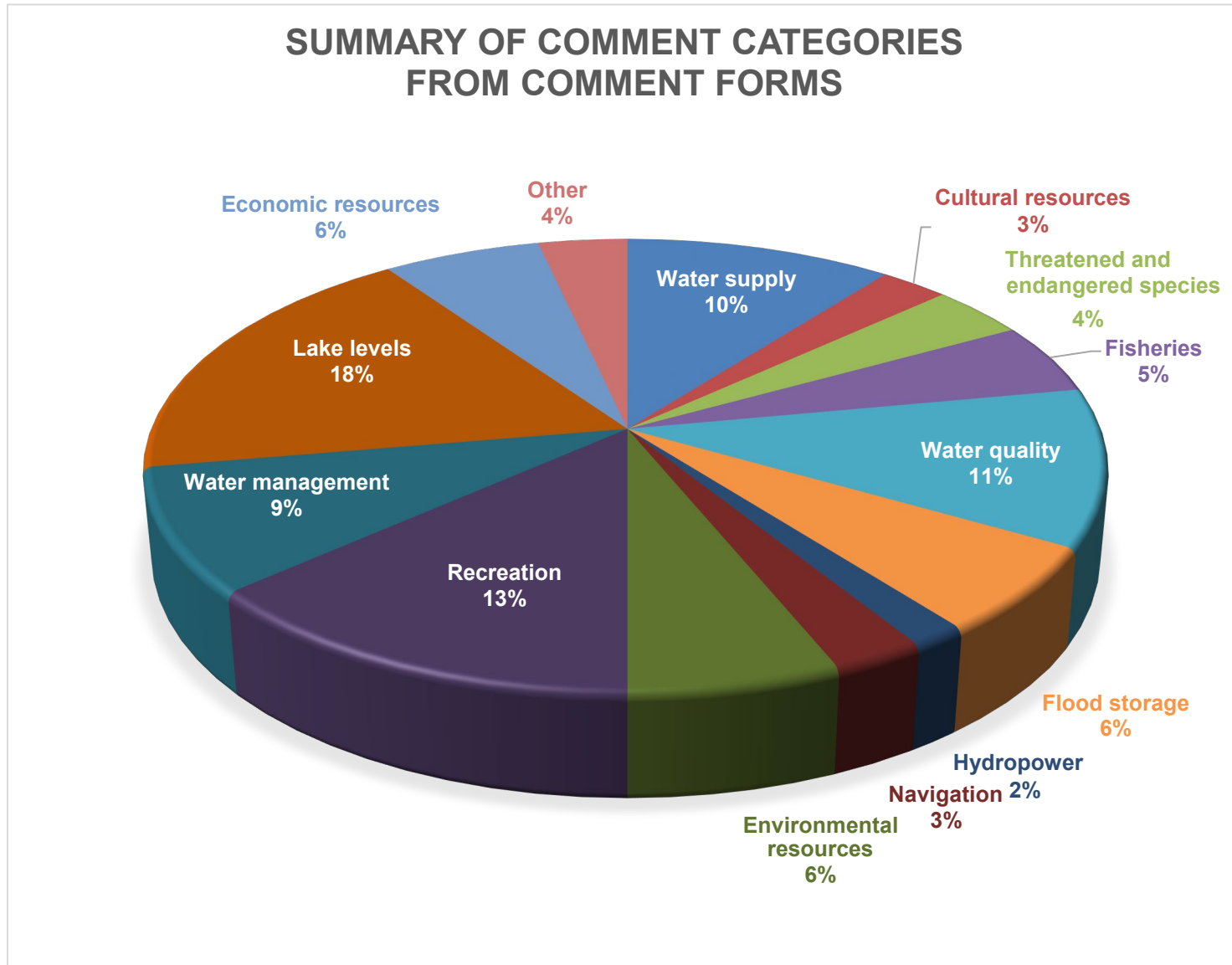


Figure 2-1. Summary of Comment Categories from Comment Forms.

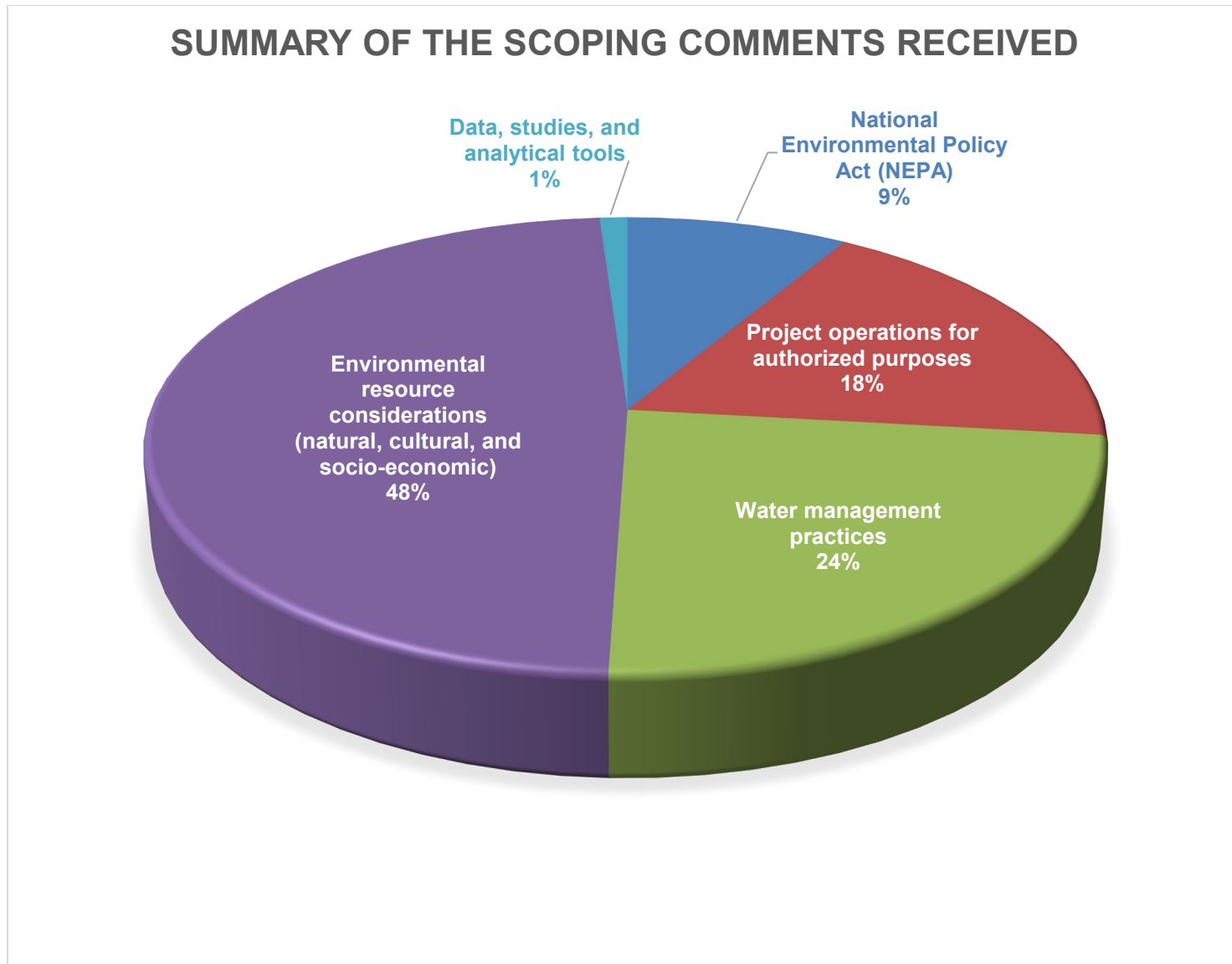


Figure 2-2. Summary of Scoping Comments Received.

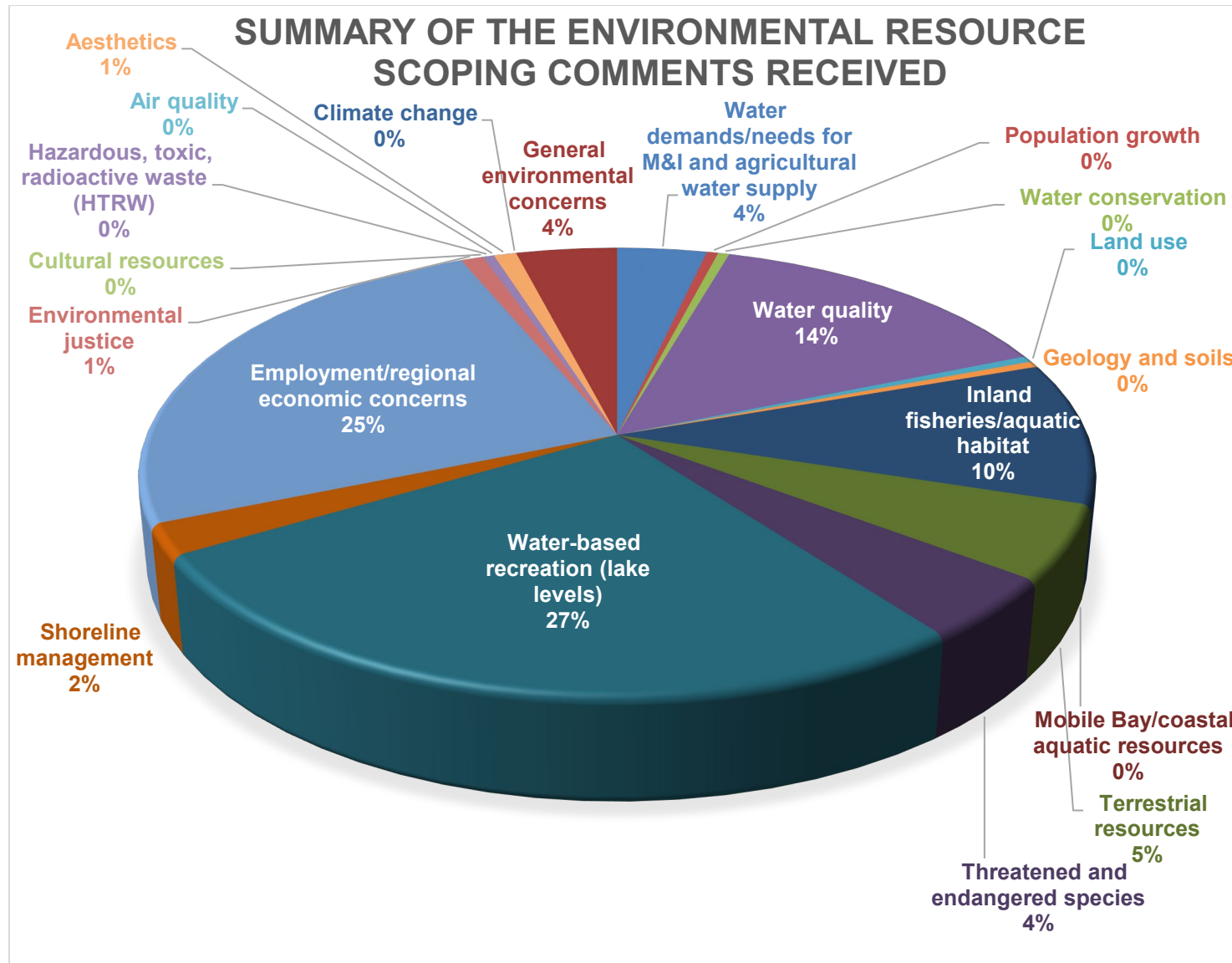


Figure 2-3. Summary of Environmental Resource Scoping Comments Received.

3.0 SCOPING COMMENT ANALYSIS

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

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

3.1 NATIONAL ENVIRONMENTAL POLICY ACT PROCESS

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

3.1.1 No Action Alternative / Baseline Condition

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

3.1.2 Role of Climate Change in Alternative Analysis

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

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

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

3.1.4 Fair Consideration to All Interests in the NEPA Process

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

3.1.5 Scoping Meetings and Future Public Meetings

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

3.2 PROJECT PURPOSES

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

3.2.1 Water Supply (Allatoona Lake)

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

3.2.1.1 Focus on Conservation/Efficiency Measures

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

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

Georgia interests maintained that the water supply request for Allatoona Lake accurately reflects 2050 water supply demands for the service area and is based on a proper storage accounting methodology that correctly accounts for "made inflows" from wastewater treatment facilities and releases from Hickory Log Creek Reservoir.

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

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

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

3.2.1.4 Exceedances of Contracted Storage Amounts

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

3.2.1.5 Water Withdrawal and Water Supply Storage Alternatives

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

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

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

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

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

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

3.2.2.2 Weiss Lake and Logan Martin Lake Flood Risk Considerations

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

3.2.2.3 Allatoona Lake Flood Risk Considerations

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

3.2.3 Hydropower (Allatoona Lake)

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

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

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

3.2.5 Recreation (Allatoona Lake)

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

3.2.6 Water Quality (Allatoona Lake)

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

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

3.3 WATER MANAGEMENT

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

3.3.1 Reservoir Storage Accounting Methodology

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

3.3.2 Flow Conditions Downstream of Allatoona Dam

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

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

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

3.3.4 Allatoona Lake Water Management Concerns and Recommendations

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

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

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

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

3.3.6 Improved Weather Forecasting and Reservoir Water Management

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

3.4 ENVIRONMENTAL RESOURCES CONSIDERATIONS

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

3.4.1 Water Quality

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

3.4.2 Biological Resources

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

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

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

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

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

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

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

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

3.4.2.4 *Wetlands*

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

3.4.2.5 *Endangered Species*

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

3.4.3 *Recreation Resources*

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

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

3.4.4 Socioeconomic Resources

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

3.4.4.1 Effects on Low-Income and Minority Populations

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

3.4.4.2 Effects of Increased Water Supply Withdrawals on Allatoona Lake

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

3.4.4.3 Effects of Current Operations at Weiss and Logan Martin Lakes

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

3.4.4.4 Effects of Increased Water Supply Withdrawals Downstream of Allatoona Lake

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

3.4.4.5 Effects of Proposed Changes at Weiss and Logan Martin Lakes

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

3.4.5 Other Environmental Resources

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

3.5 DATA, STUDIES, AND ANALYTICAL TOOLS

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

3.5.1 Coordination of USACE Modeling Efforts

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

3.5.2 Specific Issues to Address during Modeling

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

4.0 FEDERAL, STATE, AND LOCAL AGENCY COMMENTS

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

4.1 FEDERAL AGENCIES

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

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

4.2 POLITICAL ENTITIES

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

4.3 STATE AGENCIES

4.3.1 Alabama Office of Water Resources

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

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

4.3.2 Georgia Department of Natural Resources, Environmental Protection Division

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

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

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

4.4 LOCAL AGENCIES AND PUBLIC UTILITY INTERESTS

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

4.4.1 Atlanta Regional Commission / Cobb County-Marietta Water Authority

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

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

4.4.2 Alabama Power Company

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

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

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

4.4.3 Southeastern Federal Power Customers, Inc.

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

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

4.4.4 Montgomery Water Works and Sanitary Sewer Board

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

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

4.5 TRIBAL RESPONSE

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

5.0 SUMMARY OF PUBLIC SCOPING

5.1 RECOMMENDATIONS

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

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

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

5.2 INTEGRATED STUDY AND SEIS SCHEDULE

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