

Lake Allatoona Association  
Key Issues in the Revision of the U. S. Army Corps of Engineers (USACE) Water Control Manual  
**Clean Water / Water Quality**

**Outline**

The value of each gallon of water that passes through the Lake has dramatically increased since the 1940's when the Lake was planned. Plans back then placed complete emphasis on the Lake's value as to electric power and flood control - no value was assigned to the use of water for local consumption or recreation use. The USACE has not changed its operations of the Lake to recognize this dramatic shift in value.

Beginning in 1972, multiple legislation and regulatory initiatives have been implemented on the federal, state and local levels that require careful attention to improving and protecting the quality of our water resources.

The long-standing procedures by the USACE to dramatically drawdown the Lake and thus expose hundreds of acres of barren shoreline to severe erosion and sediment run-off needs to be reassessed. It is arguable that the USACE practice on the Lake results in the largest exposed/uncontained disturbed site in the State of Georgia. Leaving about 400 acres of barren soil left uncontained for 3 to 5 months each year has a huge detrimental effect to the Lake's water quality.

Repeated late winter and early spring incremental flood filling, followed by rapid drawdowns also result in added siltation and resulting water quality degradation.

USACE policies and practices should be modernized and updated to give consideration to the impact of its outdated pool operations on water quality.

**Comments**

- The USACE states in its draft EIS on the Allatoona WCM update that it has discretion to raise pool operations levels. In light of the enormous societal value of lake water, the USACE should move immediately to modernize its regulations to conserve as much water in the Lake as is possible and to give appropriate weight to the negative water quality impacts of its practices.
- The court system has definitively ruled that water supply should be included as a high priority for the USACE in operating the Lake. The USACE should take all steps necessary to comport its Lake operations with that mandate – including raising operational pool levels across all months to minimize sedimentation degradation of the water-supply uses.
- The USACE should commission a new feasibility study as to the merits of purchasing flood easements in the Cartersville Etowah River corridor to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
- The USACE should commission a new feasibility study as to the merits of constructing downstream Etowah reregulation storage capacities to increase flood risk management through increased discharge capacities and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should commission a new feasibility study as to the merits of constructing downstream from Carter Dam, Oostanaula reregulation storage capacities, to increase flood risk management and also drought insurance water conservation which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
- The USACE should immediately commission a modernized update of its flood risk management procedures, in order to account for the totality of modern major weather event forecasting capabilities

and the actual flood event history of the past 60 years. The study should include a detailed analysis of modern-day flood risk management margins as compared to the original 1950 design criteria which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures

- The USACE should publically disclose (in a format similar to its 5-week Lake level forecast curves), April-through-September Lake levels, that could have resulted if zero-benefit water releases to the Gulf had not occurred. These levels should be compared to the shown “historical average elevation”.

### Questions

1. Please explain why the USACE believes it is exempt from soil erosion and sedimentation laws and regulations that all other elements of society must follow
2. Explain what engineering considerations are given to the impact of soil erosion occurring during periods of low lake levels and the resulting exposed bare soils on the shores of Lake Allatoona
3. Given the abundance of available modern technology as to hydrologic and meteorological predictions and management, as compared to that in the 1950’s, please explain why flood risk management criteria and policies do not today provide for more advanced discharge flexibilities, with significantly increased abilities to store more lake water at all times, as compared with the way things have been done since 1950 which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures.
4. In light of modern weather system forecasting capabilities, please explain why excess early spring inflows should not be used conserve valuable water through implementation of a higher pool level as a buffer to the typical/natural dry-season inflow/outflow minimum mismatch, so that late summer pool levels are not so damaging drought –period water supply requirements and to routine recreation needs which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures
5. Please explain why the enormous local economic benefit of Lake water from prospective water supply (at least \$500 million annually) and recreation (at least \$250,000,000 annually) does not justify reevaluating decades-dated criteria that sends water downstream for much less beneficial purposes. Why does the USACE not exercise its discretion and propose specific intent to seek appropriate beneficial use of such a modern-day valuable asset as water flowing through Allatoona which would provide for greater storage capacity to minimize water quality degradation that results from shoreline exposures?
6. Please provide details on alternatives that the USACE has considered for seasonal surface treatment/protection use to minimize exposed shoreline erosion and sedimentation through modern environmental practices.