

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

Outline

The value of the Lake in terms of recreational resources and quality of life 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 – very little to no value was assigned to the use of water for quality of life and recreation uses. The four county area of the lake in the early 1950's was a very rural and poor southern Appalachian community made up of less than 100,000 people. Rural electrification was a paramount need for the area. Today, these same counties contain over 1 million people in a densely populated suburban society. The USACE has not changed its operations of the lake to recognize this dramatic shift of value.

During January and February of 2013, over 50 billion gallons of water have been needlessly drained from the lake (on top of at least that amount previously drained-out in December and January for routine winter drawdown) and dumped into the Gulf of Mexico to the benefit of nothing; this has resulted in absolutely wasted water. This happens most every year. The result of this outdated practice is that the Lake's recreational and quality of life uses are quite often dramatically impacted in the dry late-summer months. It is not uncommon for the majority of the Lake's beaches, ramps, and other recreational access points to be inaccessible to the public beginning in late July or early August. This is a travesty and a waste of our national resource.

This lake annually is one of, if not the most, heavily used USACE lakes in the nation. Annual use in most years approaches and, often, exceeds 7 million people. Small changes across a range of USACE operational practices could result in conservation of the wasted spring season water. This conservation would allow for significant improvement in lake levels and recreational uses in the later summer dry season months. Two feet of water retained in April, carefully managed, would provide for two feet higher water level in August and September.

The fact that the lake's 37,000 acres are exempted by the federal government from local property tax assessments means that about \$ 3 million has been removed from (primarily) Cherokee and Bartow County tax rolls; that amount would exceed the entire county general fund budgets of those two counties. If this amount was collected at prevailing rates, it would result in elimination of all, or almost all, such county property taxes.

The Lake's counties, in addition to shouldering the financial burden of the lake, should be able to benefit from the enormous quality of life and recreation value of the water that passes through it. The USAE must be directed to give appropriate consideration to the modern-day value of water to our local economy and to change its operations accordingly to preserve the water instead of wastefully dumping it away to the ocean.

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 to provide for extended recreation uses.
- The USACE should immediately conduct a comprehensive financial analysis that would analyze the comparative costs and benefits of water use for local power generation as compared to use for recreation and improved local quality of life.

- The USACE in its draft EIS to its WCM update states that it does not provide navigation releases from Allatoona. That being the case, the USACE should openly provide a full analysis of its past practices in support of Alabama Power Company's (APC) hydro-power release requests, to demonstrate that APC's associated water release practices do not damage recreational benefits by using Allatoona water to support navigation in Alabama.
- The USACE should modernize its daily routine to effectively be proactive in seeking to conserve Lake water in the face of developing drought conditions and seasonal water use demand/benefits, rather than continue its practice of reactive decision-making that wastes water downstream and, thereby, limits recreational 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, allowing for improved dry season recreational uses and also drought-insurance water conservation.
- 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, allowing for improved dry season recreational uses and drought-insurance water conservation.
- The USACE should commission a new feasibility study as to the merits of constructing, downstream from Carter Dam, Oostanaula reregulation storage facilities. This will allow the USACE to increase its ability to manage flood risk, allowing for improved dry season recreational uses and drought-insurance water conservation.
- 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.
- The USACE should publically disclose, in a format like its 5-week Lake level forecast curves, April-through-September lake levels compared to its shown "historical average elevation", that could have resulted if zero-benefit water releases to the Gulf had not occurred.

Questions

1. Please explain why the 5-week lake level forecast is so routinely way out of line with actual results during the reservoir re-filling season? Please describe in detail how the USACE's daily practices actively use various real-time local weather and hydrographic data to develop its operating decisions as to reservoir outflow decisions to conserve water to the benefit of local area recreational benefits.
2. Please explain, in detail, the specific USACE procedures that are used during the dry season months that result in water conservation decisions that benefit local recreational uses at the expense of downstream (APC) power generation support.
3. In light of the modern-day (huge) value of the lake water, please explain why the USACE Zone 2 management policies (based on historically outdated criteria that give insignificant weight to water supply and recreation needs) are woefully inadequate to conserve water for its highest uses for water supply and to prepare for developing drought conditions?
4. Please provide a cost analysis that demonstrates that the subsidies given to hydropower generation through water discharges are more beneficial than the value of local recreation and quality of life uses from 7 million annual users and hundreds of millions of dollars of local economic potential.
5. Please provide an analysis that shows how much of a subsidy is given to electric companies by virtue of the artificially low (as compared to prevailing peak-season electricity market rates) cost of generated power by the releases of water during the dry season months of July, August and September.

6. Please provide a cost analysis that demonstrates that the subsidies given to the occasional Alabama River barge shipment (rather than being diverted to rail shipments) is more beneficial than the beneficial economic, quality of life and recreational value of the water.
7. How much of Alabama Power's typical request of water releases goes to provide for Alabama River navigation support during the dry season months of July, August and September? How about for 2012?
8. If Alabama Power is approved to raise the level of the Lake Martin reservoir, how will the USACE insure and publically disclose that Allatoona water does not indirectly get used to provide for that capacity, since reduced Tallapoosa River flows would at some point have to be offset by Coosa River flows to meet stated USACE navigational, power generation, and environmental flows?
9. What is the cost per ton expenditure annually by all USACE operations to provide for the barge shipments along the Alabama River between Montgomery and Claiborne Lock? How much water volume is provided annually to support such shipments (separate from M&I contracts and low-flow minimums)?
10. 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.
11. Please provide details as to how the USACE uses and integrates NOAA field data and major weather system forecasting information to conserve water, rather than to just release water needlessly downstream because the rule-curve dictates so.
12. 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 to drought-period water supply requirements and to routine recreation needs.
13. 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 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 seek appropriate beneficial use of such a modern-day valuable asset as the water flowing through Allatoona?