



19 November 2013

The Office of the Governor  
State of Georgia  
203 State Capitol  
Atlanta, Georgia 30334-0900

Honorable Governor Nathan Deal:

This letter is intended to communicate our strong objection to the State of Georgia's January 24, 2013 request to the U.S. Army Corps of Engineers to further drain Lake Allatoona.

The Lake Allatoona Association's (LAA) mission is to be the "Voice of Lake Allatoona". LAA is a community-based volunteer organization comprised of individuals and businesses that have a direct stake in the continued health of Lake Allatoona. Our two primary objectives are to search for improvements in the Lake's water quality and level. For lake issues, our group represents Bartow's, Cherokee's, and Cobb's one million citizens and the Lake's 7 million annual visitors.

In recent years, LAA has strongly opposed Alabama interests who seek to take from Lake Allatoona to benefit special-interest industrialists along the Alabama River and power-players around Lake Martin. Likewise, LAA will actively oppose those within our own State who seek to do harm to the Lake and our region.

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LAA believes that the State of Georgia's request to dramatically increase withdrawals from Lake Allatoona to benefit areas outside the Upper Etowah River Basin is short-sighted and wrong. The impacts to the Lake would be significant and would include (at least):

- A reduction in the number of visitors to the Lake  
The Corps says that about 7 million people visit the Lake per year. A potential 20% reduction in visitors resulting from the State's plan would mean 1,400,000 fewer visitors to our region, significantly impacting our economy.
- Significant impact to the lives of the region's residents  
Natural resources like the Lake are treasured for their beauty and pristine condition. The State's plan would clearly impair the Lake's usefulness, attractiveness, and its value to our citizens.
- Reduction in property values  
Clearly, property values on and around the Lake would be impacted by the proposed, significantly lower water levels. In addition, property values further away from the Lake would be negatively impacted as the regional economy suffered from the effects of the State's plan.
- Negative impact to economic development  
As local and regional leaders have stated publicly, the Lake is a tremendous draw to economic development. The State's plan jeopardizes this advantage.
- Negative impact to the economy from all of the above

The State's proposal submits that, should its proposal be implemented, reduced Lake levels would result in an impact to recreational use by an "average" of 9%. It appears that the State is suggesting that the projected 9% reduction as a minor impact. The State's proposal would lead to an EXTREME impact on recreation. Since the number given by the State is an average, we have to assume that the State's modeling shows that the impact would be greater than 9% in many years. We shudder to think what this 9% impact might be in a "dry" year.

We believe that the State's withdrawal plan intends to take about one-quarter (1/4) of the Lake's "average" water flow. The fact is that the Lake's inflow rates during non-recreational periods (e.g. winter) routinely can be 300% of recreation season (summer) month flows. As an example, if the State's plan had been in place in 2011/2012, **the withdrawal of 148 MGD would have been over 2/3<sup>rds</sup> of the Lake's inflows during the crucial May-September months. The result would have been disastrous on the Lake's usability with a projected 6.3 feet in each year of additional drawdown in the Lake level.**

LAA believes that, where possible, all communities (including the Atlanta metro counties) should be self-sufficient and not seek to take value from external sources to subsidize their own thirsts. These communities, with the State's

assistance, should fund the planning, construction and operation of “off-to-the-side” storage reservoirs which would capture winter-season water for use during drier summer months.

Additionally, the State appears to have ignored the enormous volume and potential value of water that wastefully drains from the Lake directly to the Gulf of Mexico during the winter and early spring seasons. As an example, **it has been estimated that over 100,000,000,000 (100 billion) gallons of water were drained by from the Lake in the first half of 2013 merely to keep Lake levels below its decades-old and dated “rule-curve”. Instead of doing grievous damage to Lake Allatoona through short-sighted summer withdrawals, the State should be focused on plans to store and capture these enormous off-season flows.**

The State needs to better define the impacts that could result from the implementation of this request, including, at least:

- Define, with detail, what the increased withdrawals will do to Lake levels in the May-to-September periods of drought years.
- Provide a more detailed and thorough description of the negative impacts to recreation. As examples, provide specific drawdown parameters for each of the recreation season months and fund an independent study of the likely negative impact to recreation.
- Provide a more detailed explanation of the impact to fishing, including an evaluation of the impact to fish populations and health as well as impacts to boat ramps for each season in below, average, and above normal rainfall years.
- The State represents that it wishes to lower Lake Allatoona summer pool levels because other alternatives available to the benefiting water utilities would be more costly. The State needs to detail the cost of these alternatives.
- Provide a thorough examination of the proposed damage to the Lake aesthetics.

The Lake's quality-of-life contribution to our area is so valuable as to perhaps be immeasurable. What the State is proposing to take away simply cannot be replaced or repaired.

- Provide a thorough examination of the environmental impact that will result if this proposal is implemented. For example, how much additional erosion will occur as a result of additional exposed shoreline?
- Further define the economic impact of the State's plan. Over 2000 jobs are Lake-dependent and the economic footprint of the Lake exceeds \$250 million. What damage will the State's plan do to that current value? The State needs to fund an independent full-blown economic impact study.

LAA respectfully submits that the State of Georgia has not presented the full picture.

Please withdraw your request to drain Lake Allatoona. And, please advise the respective jurisdictions to solve their problems at their own - not Lake Allatoona's - expense.

Out of respect, this letter will not be released to parties beyond those copied for thirty days. We would welcome an opportunity to further discuss this matter.

Respectfully,

Board of Directors  
Lake Allatoona Association

Cc Assistant Secretary Jo-Ellen Darcy  
Department of the Army

Colonel Donald Jackson,  
Commander USACE South Atlantic Division

Colonel Steven Roemhildt,  
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