



April 23, 2013

Commander, U.S. Army Corps of Engineers, Mobile District
Attn: PD-EI (ACT-DEIS)
P.O. Box 2288, Mobile, AL 36628

RE: Comments regarding update of ACT Water Control Manual

Dear Sir or Madam:

Thank you for the opportunity to submit comments regarding the Corps of Engineers' ("Corps") revision of the Water Control Manual ("WCM") for the Alabama-Coosa-Tallapoosa Flint River ("ACT") system. The Lake Allatoona Association is the community-based non-profit organization of like-minded lake resource users whose sole purpose is to seek improved lake water quality and levels through activity as "The Voice of Lake Allatoona". Our below and attached comments are constructively offered to that end.

The CORPS has a serious responsibility with the overriding flood risk management task of Allatoona Lake. Nothing that we believe or seek is offered to compromise that task. However given the now enormous value that our Lake water has to literally over a million people for water supply and recreational quality of life, we believe that changes are in order, from the way things have been done with single focus on flood control since 1950, to the detriment of water supply and recreational quality-of-life purposes.

In 1950, the CORPS' best weather forecasting tools were nothing like what it now has routine access to through NOAA and other sources; seasonal forecast capabilities of lake inflows give exponentially improved abilities to manage lake outflows. In 1950 the CORPS hydrologic models were weak shadows of what it uses today from hundreds of real time stream flow gauges and sophisticated HEC RAS runoff models. In 1950, rural Bartow, Cherokee, Cobb and Paulding Counties' populations totaled less than 100,000 people and the water was so invaluable then that its use was most often not even metered. Today the Lake is directly surrounded by over 1 million people who are paying about \$5 dollars for every 1000 gallons of water.

In light of these enormous changes, LAA has thoughtfully sponsored a comprehensive set of recommendations for positive change to Allatoona's water levels, with connected improved levels of lake water quality. LAA calls this program "2-4-6-8, Allatoona Clean"; in summary that label refers to the nominal outcomes that LAA seeks – namely: A 2-foot increase in summer pool levels, such summer pool level beginning 4-weeks earlier than

it presently does, such summer pool level held higher for 6-weeks longer than it is presently, and an 8-foot reduction in the winter season drawdown. The 2-4-6-8, Allatoona Clean proposal is not offered as the only solution and its particular numbers are not sacred. Rather, it was offered in the past and is again offered to prompt discussion and debate around the central proposition that the Lake's water levels could be managed differently to the benefit of certain of the Lake's "purposes" and without detrimental effect on the chiefly emphasized "purpose" of flood control. That 3-page document was provided to the CORPS in 2010, and is attached for your ease of reference.

Within the above outlined context, LAA had hoped to find that the WCM update would have addressed such a critical issue as the need to improve operations relating to Allatoona Lake's very important water supply and recreation quality-of-life characteristics. Instead, we are very disappointed to see that the revision's scope had been severely restricted such that no consideration has been given (except for projections of minor reductions in late recreation season power generation releases) in the update to implement Allatoona Lake water conservation measures that could prove of great value toward serving water supply and recreation needs.

The public deserves a zero-based, bottoms-up review of how the Lake is managed, to include consideration of retaining more water in the lake year-round. While the laws and regulations may require that the Corps offer an opportunity for public comment, it is disingenuous to do so when, in fact, the parameters of the review are so constrained as to be make the process a token effort and the solicitation of public comment a form of patronization within a process that results in no meaningful improvements, modernization or recognition of 21st century realities and needs as relates to Allatoona Lake.

Therefore, to provide the CORPS comments on the Draft EIS on the WCM, LAA attaches six compilations of about 40 specific questions or requests provided by our membership on each Key Issue of: Economics, Recreation, Fishing, Water Supply and Drought Storage, Water Quality, Environment.

In summary, LAA believes that the CORPS could pay attention to a range of detail different from how it established over 60 years ago to not only manage flood risks but also to conserve and not wastefully dump water to the ocean, thus using the full potential of the Lake's water to benefit local water supply and recreational purposes across all four seasons without increasing flood risks that were foreseen in 1950.

Sincerely,

Lake Allatoona Association
Board of Directors

attachments