

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

Outline

There are many significant environmental impacts that result from the USACE management of the Lake and, particularly, the management of the water level. Just two are discussed here.

The greatest concern is that the low water levels in the winter, spring, and fall leave many acres of bare soil exposed for months to rain and wind erosion. This is likely the worst case of exposed soil in the State of Georgia and it is managed by an arm of the federal government. 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. For many months, every rain event causes significant erosion of this exposed soil that is carried towards the center of the Lake. The short-term results include vast plumes of sediment in all parts of the Lake.

Another significant negative impact of the USACE's water level management practices is the concentration of pollutants during the winter, spring, and fall seasons. Unfortunately, there is a significant amount of pollutants in the Lake due to poor management of the lands (drainage basin) surrounding the Lake which results in various pollutants entering the Lake (e.g. herbicides, fertilizers, oils, etc.). When the Lake level is dropped for the large majority of the year, these pollutants are concentrated in the smaller amount of water in the Lake.

Comments

- The Corps eliminates from consideration any changes in the conservation pool level or winter pool level. These two parameters are the most crucial in terms of potential environmental impact. An open assessment of how the Lake could or should be managed must include an assessment of the merits of the historic full pool level and the historic winter pool level.
- The Corps eliminates from consideration any measures that would change the minimum releases or minimum flows to ensure other entities meet federal clean water compliance requirements. This begs the question as to what extent minimum releases and minimum flows were evaluated.
- The Corps eliminates from consideration any measures that would significantly affect hydropower at Allatoona.

Questions

1. In order to manage the Lake in an "optimal" manner, it seems prudent to assess the ramifications of changing the full pool and winter pool levels. They are the most crucial constraints affecting all of the Lake's authorized purposes: recreation, water supply, hydropower, flood control. If these parameters are outside the scope of updating the WCM, how and by whose authority would those parameters be evaluated to ensure they are set at reasonably optimal levels?
2. The only significant change in the year-round water level of the Lake contained in the draft WCM Alternative Plan G (Proposed Action Alternative) is a revision to guide curves and action zones that will result in a phased fall drawdown which would result in a slight increase in water level in the fall and winter. Was a full range of changes to the guide curves considered with an eye to keeping as much water in the Lake as possible without unduly increasing flood control risk? Was the proposed guide curve change offered because it is the least likely to face opposition?
3. There are a number of minimum releases, maximum flow, maximum withdrawal parameters in place that affect the lake's operation and management. Were these max./min. requirements reviewed in Toto (as a group)?

4. Did the Corps conduct a full assessment of the value and cost of the hydropower operation at Lake Allatoona? Does the requirement to have a hydropower function “cost” the lake’s operation more than “benefit” it, in the sense that operational decisions are made simply because of the requirement to produce electricity? With all competing requirements in managing the lake, does the Corps support continued hydropower production?
5. There is an environmental and economic value in retaining more water in Lake Allatoona. The risks of doing so should be manageable. The Corps formulates draft alternatives to be considered in updating the WCM, thus limiting the scope of any update severely. Quoted from the EIS: “The range of actions, alternatives, and effects considered in this EIS are driven by the requirements set forth by Congress and Corps policies for project operation.” Please help us break down that broad statement. How and by what authority can the public achieve a comprehensive zero-based-budget-type assessment of how the lake should be managed?