



December 11, 2018

Commander USACE, Mobile District,
Sebastien P. Joly
P.O. Box 2288
Mobile, AL 36628-0001

Dear Commander:

This is a follow-up to several letters submitted in recent years (most recently December 19, 2017) on the new Allatoona Lake Water Control Manual (WCM); water management history; and is to supplement and to amplify the comments submitted in August 2018 regarding the proposed Allatoona Lake Reallocation Study and the WCM Revision process.

The Allatoona Lake Association (LAA) wishes to focus on the 2018 “mini-drought” that adversely depleted Allatoona’s drainage basin from June to September. The USACE’s routine power generation practices during that crucial recreational season resulted in a serious deterioration of Allatoona Lake’s recreation use and benefit. The recent USACE set of decisions underlines and punctuates the central and crucial issue that is the subject of LAA’s letters and submittals concern. LAA’s point is that USACE practices are outmoded and need to be updated to give proper attention to modern-day economic value and to the importance of regionally recreational-driven resource uses and purposes.

During the summer of 2018, the USACE’s daily generation withdrawals served the benefit of undue electric supplier subsidies, at a cost to the 10 million local lake users. The consistent release of maximum river flow discharges for 6 hours almost every weekday throughout the summer recreation season resulted in a full pool drop to more than 5 below normal summer pool by early September. That serious detriment could not have been necessary.

The point is not that power generation is not central to Allatoona Lake’s purpose...but that the use of inefficient and outmoded power generation pricing formulas resulted in electrical suppliers being given windfall subsidies, and summer season recreation value is given short shrift. The USACE electrical sale pricing models need to reflect real-time summer electrical peak demand market pricing levels...the electrical suppliers must be over-joyed that you sell energy at levels lower from what they pay from other peaking sources...and are pleased to suck out any CFS that you will avail to them. If realistic peak season pricing were in place, they would use more discretion in their water discharge requests; and if the enormous modern-day value of summer recreational use were recognized, a more appropriate “mini-drought” summer water level drawdown would be a result.

The USACE must re-evaluate the modern-day water value for recreational, economic and quality-of-life uses. As well, the USACE needs to charge peak demand pricing levels that are consistent with other peak electrical supply costs. These outdated value levels are not well-serving to the diverse USACE constituencies and must be given a new serious and objective evaluation. It appears that modest incremental value adjustments could easily solve most of the problems that resulted in the season that just ended.

We seek the Lake's best – where there is a will, there will be a way. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads "M F Bearden". The signature is written in a cursive, slightly slanted style.

Mike Bearden, Chairman for
Lake Allatoona Association Board of Directors

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