



July 26, 2018

Commander USACE, Mobile District,
ATTN: PD-EI (ACT-ACR),
P.O. Box 2288, Mobile, AL 36628-0001

Dear Commander:

This is to submit comments on the proposed Allatoona Lake Reallocation Study and WCM Revision; thank you for the opportunity; LAA appreciates your stewardship of our wonderful lake.

The LAA is dismayed that the State of Georgia, as demonstrated in its March 30, 2018 request to take more water from our local lake to other parts of the State, continues to virtually ignore the hugely important role that Allatoona Lake has in Northwest Georgia's economic vitality and recreational quality of life. We strongly oppose the goal of that letter request, and reject its underlying generalized assumptions that allows the State to represent that there would be insignificant impact on the lake's recreational use (and thus local economic impact) if their request were to be granted.

Allatoona's recreational and economic value is huge, as evidenced by its over 7,000,000 annual users. It is shortsighted and greedy for the State to ignore this vitally important economic and quality of life issue and to seek to transfer some of its value to other regions at our expense; the USACE should not allow these selfish high-growth development interests to inflict any damage to our wonderful regional/national asset. Allatoona with its water area and its surrounding thousands of acres of wilderness shoreline is an irreplaceable asset uniquely accessible within an hour drive to 6 million people. It would be a shame to do anything that takes away from, rather than adds to its recreational value: how dare the State to ignore this principle and seek to do harm to our treasured lake. As an example, if the State's withdrawals resulted in only a \$5 reduction to each of these user's value, that would result in a transfer of \$35,000,000 annually from our region to, in effect, primarily Fulton and Gwinnett County residents...since that is where this water is ultimately intended to wind up. At a prevailing annual discount rate of 4%, that annual transfer equates to an equivalent \$875,000,000 asset theft from us here in the Etowah basin to those within the Chattahoochee basin – not right and should not happen.

The State's use of "average" water level conditions to present its case is misleading at best and possibly an intentional misrepresentation of facts. We first point you to the State's 2013 application as a precedent in reaching this opinion. In that submittal the State hid the likelihood that Allatoona Lake's recreational season water levels would be decrease by many feet by submitting that "average" conditions would be minimal with hardly any impact on recreational uses. This latest submittal repeats this misleading pattern and does not identify what the water level drawdowns would be under adverse drought conditions. We respectfully request that you not be misled by such weak generalizations.

Most importantly, we believe that your decision criteria should be governed by the principle that each major river basin should live within its existing watershed basin means, outside true emergency conditions, or should pay the injured locale for the right to remove capacity from one region to another. More specifically, our Northwest Georgia region should not have its assets stripped to support the aggressive and oftentimes unbridled growth practices of, in particular, Fulton and Gwinnett Counties. Further, Allatoona Lake should not be the step-child supplier of excess flow into the Coosa River that Alabama interests wish to use to offset reduced Tallapoosa River flows in a goal to raise its Lake Martin levels. Each basin should be required to first identify and fully vet other water supply alternatives rather than facilely taking from Allatoona Lake at penalty to its 7,000,000 plus annual users...at no cost to the end beneficiary consumers. They must pay their own way. Accordingly, we suggest the following alternatives to the State's (and Alabama's) Allatoona Lake Water raid.

Fundamentally we suggest that the USACE work with the State of Georgia (and Alabama) to “flip” the enormous volume of water that is uselessly drained annually from the Allatoona Basin in a direct pass-through to Mobile Bay. Instead of reacting after-the-fact to every 17’ winter drawdown and the intermittent major flood flows that occur frequently almost every non-drought year...please develop a long-range strategic plan to proactively capture and store this huge excess off-stream for then subsequent use as the States need. The enormous volume of water that flows in excess as a pass-through to Mobile Bay (beyond normal river flow needs) from the annual winter drawdown from 840 to 823 MSL, plus an assumed 3 feet annual seasonal flood withdrawals is about 6,714,220,000 gallons - 84,000 gallons per day - which is twice the State’s 2050 request.

To that end, we point you to several feasible long-term natural storage alternatives. To bring these to reality you all need foresight, patience, pumps, pipes and proactive-cooperative cross-governmental management...we believe you have that in you. Plus some money; but as we demonstrate below, likely much less money than the economic penalty that the State seeks to thrust upon us. Our metro area neighbors who live/work/play in the Lanier/Chattahoochee Basin should be mandated to care for their own drought supply needs routinely – instead of seeking to take from our resources for their solution.

For your consideration - first glance prospective storage sites: Hurricane Hollow at the dam, Marble Road Quarry adjacent to Little River, Pumpkinvine Creek below Allatoona Pass, Vulcan Quarry off McKaskey Creek; Paga Mines below the dam; downstream Etowah Reregulation Dam; etc. If sincere evaluations have been completed on these suggestions, we’d like to hear about them...because we are of the opinion that their costs would not cause anyone to continue to seek to do \$875,000,000 damage to the local asset value of Allatoona Lake through which its 7,000,000 users generate over \$300,000,000 local economic benefit.

Separately, we again suggest five WCM tactics that should support improvement all around:

1. Commission an objective Flood Retention Risk Assessment Update based on the now 120 years of weather history to work toward a goal of reduced required winter drawdown levels flood storage needs.
2. The Etowah River Channel Capacity cap should be restored to 12000cfs. Within this overall context, the cost to purchase a handful of Cartersville area flood easements would be insignificant compared to the added flood discharge flexibility from the added 3000 CFS from 9000cfs.
3. Allatoona’s Rule Curve should be further revised to extend its Zone 2 at 840 into November.
4. USACE should work with SEPA, Cobb and Cartersville to develop seasonal market based power and water supply pricing formulas. Each of those utilities charge their end users on an inverted price schedule...so should you in light of the much higher value of summer water and power.
5. Any withdrawn Allatoona water should be returned to the Lake at a higher quality than that withdrawn.

However, in larger context, the logical permanent solution to the Water Wars conflict should be for Georgia and Alabama to negotiate a deal with Tennessee whereby Chattanooga would be given the approval to build the “2nd Atlanta airport” in exchange for the right to place pumps and pipes from the Tennessee River to move less than 1% of it’s flow south to Atlanta by way of tunnels through Sand and Lookout Mtns, to flow to the Coosa and shared downstream thereafter.

Thank you for your stewardship; we seek the Lake’s best – where there is a will, there will be a way.

Sincerely,



Mike Bearden, Chairman
Lake Allatoona Association

PO Box 756

Acworth, Ga. 30101

www.lakeallatoonaassoc.com