

Georgia Department of Natural Resources

2 Martin Luther King Jr., Drive, Suite 1152 East Tower, Atlanta, Georgia 30334

Mark Williams, Commissioner

F. Allen Barnes., Director

Environmental Protection Division

(404) 656-4713

November 7, 2011

Colonel Steven Roemhildt
Corps of Engineers
District Engineer
Department of the Army
Mobile District, Corps of Engineers
P.O. Box 2288
Mobile, AL 36628-0001

Dear Colonel Roemhildt:

I am writing to request that beginning on the earliest possible date, and continuing through March 31, 2012, the U.S. Army Corps of Engineers reduce the releases that it makes from Lake Lanier to meet a target flow (after river withdrawals) in the Chattahoochee River near the confluence with Peachtree Creek. The Corps currently is making releases to ensure a flow of not less than 750 cubic feet per second (cfs) in the Chattahoochee River at that location. In the interest of conserving water stored in Lake Lanier, I request that through March 31, 2012, the water quality target be 650 cfs.

The Apalachicola-Chattahoochee-Flint River is experiencing extreme drought conditions, as indicated in the current U.S. Drought Monitor Map. See Attachment A, a recent presentation of the National Integrated Drought Information System (NIDIS), at p. 2. Some longer-term forecasts predict strengthening La Nina conditions, which could result in below-normal rainfall during the winter and spring. Attachment A at pp. 19-22. The Corps' ACF Basin reservoirs and composite storage are approaching Zone 4. Attachment A at p. 13-16.

Georgia EPD's water quality analysis using the Chattahoochee River Model, prepared in conjunction with our February 2008 request for a similar reduction in the flow target, indicated that water quality criteria for fishable streams could be maintained through the cooler winter and spring seasons with a flow of 650 cfs at Peachtree Creek. See Attachment B. This analysis assumed severe meteorological conditions, critical hydrological conditions, and recorded 2007 treated wastewater loadings. If that model were to be used today, only the treated wastewater loadings would be different. EPD has determined that current wastewater loadings are actually less than 2007 loadings, perhaps by as much as 20 percent, and are at approximately 21 percent of permitted wastewater loads. Therefore, the 2008 modeling remains valid for assessing the impact of the present request and demonstrates that reduction of the flow target to 650 cfs will not result in a water quality violation. Additionally, EPD's water quality data for the year 2008 shows that there were no violations of the dissolved oxygen water quality criterion when the

Corps reduced the flow target to 650 cfs. See Georgia EPD's continuous water quality monitoring data at http://gaepd.com/Documents/capps_ferry_do_monitoring.html.

This request should not adversely affect areas downstream of Atlanta, including West Point Lake, Columbus, Lake Walter F. George, Lake Seminole, or the Apalachicola River. Georgia EPD modeling indicates that any impact on West Point Lake or Lake Walter F. George would be very small. See Attachment C. Notwithstanding a reduction of the Peachtree Creek flow target, the Corps would retain discretion to make releases from Lake Lanier as might be necessary and prudent to support the lower reservoirs and needs in Georgia. The Revised Interim Operating Plan will remain in effect and will dictate releases from Jim Woodruff Dam to the Apalachicola River.

I also enclose an Adaptive Management Plan that Georgia EPD developed in 2008 in conjunction our earlier request for flow reduction. See Attachment D. The Adaptive Management Plan will help us detect and report to the Corps water quality problems, if any should occur. In this way, we can help ensure that the Corps can take prompt action to restore a higher flow if necessary. At the same time, over the next several months, we will continue to monitor closely the elevation of Lake Lanier and the other reservoirs to determine whether a further or extended reduction in the flow target might be warranted.

Thank you for your prompt attention to this request. Please let me know if you need additional information.

Sincerely,



F. Allen Barnes
Director

Attachments