

Glades Reservoir EIS - Scoping Comments

PROJECT WEBSITE COMMENT SUBMISSIONS

Online Comment #	Comment	Date/Time Received	Affiliation Type	Affiliation Name
1	After reading about this, we are very exciting to see this project get going. This is a beautiful area.	3/2/2012 16:05	Property Owner	
2	Why do we need another lake when we will be pumping out of the water that supplies a major amount of water to lake lanier where the water is already low.	3/10/2012 7:43	Individual	
3	<p>Mr. Richard Morgan US Army Corps of Engineers Regulatory Division 100 W. Oglethorpe Ave. Savannah GA 31401 Re: Comments on Glades Permit EIS Scoping: Corps' Response to Florida's call for Programmatic EIS considering options including IBTs? Dear Mr. Morgan:</p> <p>These comments are being submitted for the Corps' public scoping meeting in Gainesville on March 20, 2012, on the environmental impact statement for the Section 404 permit for Glades Reservoir in Hall County GA.</p> <p>One issue that must be addressed in this scoping decision, is Florida's January 2010 demand for a programmatic EIS that considers the cumulative impact of all proposed withdrawals and reservoirs (including Glades) in the Apalachicola-Chattahoochee-Flint (ACF) Basin, and that also considers other water supply options such as interbasin transfers (IBTs) into the ACF Basin and desalination. See: http://www.dep.state.fl.us/mainpage/acf/files/letters/010410zettle.pdf</p> <p>At Section D.3 of this letter, Florida stated: "For one of the planned reservoirs, the Glades Reservoir, the Corps Savannah District is currently considering a Clean Water Act Section 404 permit, though no programmatic EIS for these and other proposed reservoirs is planned. The cumulative impacts of the proposed reservoirs, and any additional water supply sources or diversions necessitated by the Phase 1 Order, must be evaluated by the Corps as part of the WCM EIS process." (Emphasis supplied.)</p> <p>And at Section C.3, Florida stated: "In evaluating these impacts... the Corps should include careful consideration of alternatives to development of new water supply sources, including water conservation measures, wastewater reuse and recycling, and other water supply alternativessuch as inter-basin transfers to the ACF Basin and desalination." (Emphasis supplied.)</p> <p>In responding to Florida's call to consider IBTs, the Corps may want to consider the fact that the ACF litigation may become an equitable apportionment case at some point. In that event, Florida's call would be consistent with a state's duty to take reasonable steps to augment the disputed stream, under the US Supreme Court's equitable apportionment doctrine as stated in Colorado v. New Mexico (1982): http://supreme.justia.com/cases/federal/us/459/176/case.html</p> <p>There, the Court wrote: "Equitable apportionment is the doctrine of federal common law that governs disputes between States concerning their rights to use the water of an interstate stream. ... "We have invoked equitable apportionment not only to require the reasonably efficient use of water, but also to impose on States an affirmative duty to take reasonable steps to conserve and augment the water supply of an interstate stream." (pp. 183 and 185). (Emphasis supplied.)</p> <p>If ACF becomes an equitable apportionment case, then Georgia and Alabama could both owe a duty to Florida to take reasonable steps to augment the Chattahoochee River. In Georgia's case, that could mean pursuing an IBT using Georgia's own riparian rights in the much larger Tennessee River, as shown in SR 822 (Act 798) of 2008. In Alabama's case, that could mean not unreasonably opposing Georgia's use of an IBT from the Tennessee River to augment the Chattahoochee (as well as the Coosa, over which Alabama has also been litigating). TVA's Reservoir Operations Study of 2004 has already shown that an IBT of 250 MGD from the Tennessee River in northwest Georgia would not affect TVA reservoir levels in north Alabama. While such an IBT would therefore not adversely affect north Alabama, it would augment the very rivers about which Alabama is currently litigating. Hence, any opposition by Alabama to such an IBT would appear to be unreasonable and thus in violation of Alabama's equitable apportionment duty to Florida. By way of background, I am an environmental consultant, a resident of Forsyth County GA, and a member of the Metro North Georgia Water Planning District's Lake Lanier Basin Advisory Council. I have taught environmental and natural resources law, as well as a graduate engineering course in water policy, at both Ole Miss and Samford University. For several years I have been working with Brown & Caldwell Environmental Engineers & Consultants and Hall Booth Smith & Slover, among others, to explorehow Georgia can help solve its water problems by an IBT from the Tennessee River where it crosses the 35th parallel at Georgia's northwest corner. These comments, however, are being submitted only in my capacity as a resident of Forsyth County GA, and not on behalf of anyone else. Thank you for your consideration.</p>	3/20/2012 13:27	Individual	Resident of Forsyth County CA
4	Why is there so much pipe proposed? Is there another route to reduce the length of pipe proposed? Why Cedar Creek? Is it because it is a reservoir not associated with Lake Lanier? Why not pump it back into Lake Lanier?	3/20/2012 17:43	Other	

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5	<p>Remarks/suggestions concerning the Glades reservoir.</p> <p>NEEDS</p> <ul style="list-style-type: none"> • We view the development of a new reservoir as highly necessary for present and future need of the county and towns. • There is not enough clarity as to cost: we have seen estimated amounts for Glades of \$155MM to \$ 290MM (at the college descriptive boards) plus wildly higher ones. • What will the cost of Cedar Creek be? Is the piping and pumping included in the first estimate? • WETLANDS • We believe compensating wetlands can be developed around the banks of the new reservoirs. If this is true then it should be clearly stated. <p>There is sure to be objection about lost wetlands. They are extremely valuable to our ecology and aquifer.</p> <ul style="list-style-type: none"> • UNIT COST per Gallon • Do you have a measure to determine installation cost per gallon of delivered water (and per person)? • Use limitations: boating limits? Protection around the perimeter against nutrients... Algae bloom resistance? 	3/22/2012 9:52	Property Owner	
6	<p>We are opposed to the Glades Reservoir for two reasons:</p> <p>1)We believe the reservoir will result in a decreased flow of water into Lake Lanier and negatively impact lake levels and water quality.</p> <p>2)We believe estimated costs of construction and maintenance will wildly exceed estimates and severely impact Hall County taxpayers.</p>	3/22/2012 12:45	Property Owner	
7	<p>Not only will a reduction in fresh water entering the Apalachicola river system harm the ecosystem which has evolved for millennia and supports many families through oystering, shrimping and fishing. it will kill one of the last great pristine bays in North America. Is this a resource we can afford to lose? Chesapeake, Biscayne, Tampa Bay: All ruined. No fishing, no oysters, no shrimp, no money for commercial fishing families, no fun for recreational fishermen. Please don't do this!</p>	3/23/2012 21:45	Property Owner	
8	<p>Given that we know that water in the ACF Basin is a limited resource, does the ACF Basin really need another set of stakeholders fighting over a limited resource and negatively affecting existing downstream stakeholders?</p>	3/29/2012 15:12	Non Governmental Organization	West Point Lake Coalition
9	<p>I have been told that hydrologist estimate that 1.2 billion gallons of water will be lost to evaporation each year. Is this reasonably accurate and can we afford to lose that?</p>	3/29/2012 15:12	Non Governmental Organization	West Point Lake Coalition
10	<p>West Point Lake is the only federal reservoir on the ACF System which is specifically authorized by Congress for Recreation and Sport Fishing/Wildlife Development. Historically, WPL has been managed below the initial recreation impact level and Glades Reservoir would appear to further exasperate that situation and cause economic harm to the communities surrounding West Point Lake. A drop of even a half foot in West Point Lake levels will have serious economic implications on lake visitation, tournaments, and tourism!</p>	3/29/2012 15:12	Non Governmental Organization	West Point Lake Coalition
11	<p>To the extent that Glades Reservoir would affect West Point Lake levels, we believe there is a potential environmental justice issue as lower lake levels make it increasingly difficult for low income and minorities to fish from the bank; and these people are mainly fishing for sustenance!</p>	3/29/2012 15:45		
12	<p>What are the water quality / flow implications for the river and for the downstream reservoirs and aquatic life?</p>	3/29/2012 15:45		
13	<p>We need one agency responsible for managing the ACF System. Glades will be an amenity reservoir not managed by the Corps of Engineers; then you have the Georgia Power lakes also not managed by the Corps of Engineers. Therefore, you end up with the Corps of Engineers managing the federal reservoirs for all the needs of the ACF System while the privately owned lakes contribute little to nothing and hoard water which is NOT theirs to keep!</p>	3/29/2012 15:45		
14	<p>The cumulative effects of holding back water in the ACF system has negatively impacted the Apalachicola River and Bay. Another dam and reservoir on the ACF system will continue the low flows to the river. Thousands of trees have died in the river bottom-land swamps and important fisheries have dried up.</p>	3/30/2012 14:21		
15	<p>Where is the proposed mitigation required to offset the loss?</p>	3/30/2012 15:56	Individual	

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16	I currently live, work, and love this place, and have for the last 40 years at the very bottom of this ecological wet land known as the Apalachicola River a mighty amazing and beautiful place, where fresh water meets salt, and my comment is on the (Glades Reservoir) I am sorry to hear of Atlanta, Georgia, Florida water woes, But if they keep taking the water out the Rivers, they will KILL this place down here. For you see you have to have the right mixture of (FRESH WATER) and salt water for most all the Aquatic wildlife. The fish, shrimp, oysters, crabs, everything down here is in DANGER of being extinct, if they keep taking the water. It has already been on the decline in the last 10 years, they have been taking more and more of the precious FRESH WATER that is needed to keep this ecological wildlife alive, not to mention the millions in seafood and jobs at risk and yes we too will suffer, we the PEOPLE.	3/30/2012 23:21	Individual	
17	Who and when were any studies or research accomplished as to what will occur after the seafood industry is affected and or destroyed, by this and other previous alternations to this water flow? Who will pay for the lost incomes, and revenues, as well as all of the cities, towns, villages, counties, other state(s) and families that will be forced to alter their lives due to this proposed plan of water control for the benefit of a single town?	3/31/2012 8:38	Other	American Citizen/ Retired Military Veteran/college student
18	I am against the building of another reservoir as I believe it will negatively affect the water levels currently seen on West Point Lake. The Army Corps does a poor job of managing the water they have and the problem will be further compounded with this project.	4/2/2012 9:11	Property Owner	
19	What part of the following comment are you having trouble understanding? In April 2009, Brig. Gen. Joseph Schroedel, commander of the corps South Atlantic Division, spoke at a National Research Council conference in Washington, D.C. on the issue of managing the flows of water in the ACF Basin. There is not enough water in the ACF to meet current needs, and I want to repeat that for emphasis. There's not enough water in the ACF Basin to meet current needs, he said.	4/2/2012 10:31		
20	Sirs: The priorities for the Glades Reservoir are out of order. A lot of government entities have ended up in debt by not first getting money first in their plan to do a huge public project. Answer even before EIS, who pays for this project? If the owners of the land surrounding the reservoir are suddenly going to have valuable "lake" front property, they should pay for the reservoir.	4/8/2012 12:41	Property Owner	Idlewyle Farm
21	Sir: The population of Hall County is 200,000 at present. This base is to pay for a reservoir planned for 500,000 people. Jefferson County, Alabama and Harrisburg, Pennsylvania are bankrupt because public works projects have proven to be much, much more expensive than anticipated. There needs to be no EIA until Gainesville and Hall County agree on the proposed geometry; the April 8 Times outlines the issues. Does Hagan's Creek enter the Chattahoochee below Flat Creek?	4/8/2012 12:52	Property Owner	gainesville, ga
22	It would seem that the first step is for Hall County to fully fund a comprehensive study before there is any serious discussion. The very topics listed for this comment section seem relevant to that study. Let them put their money where their ambition is. Personally, I am particularly concerned about the residual downstream damage that occurs with construction, the impact of withdrawing water to fill the reservoir and potential for interfering with downstream flows over the long term. If they want to mess up their own county, that is their affair, but damage stops at the county line.	4/10/2012 10:07	Individual	Upper Chattahoochee Riverkeeper
23	I am an avid fisherman and have been on lakes Lanier, West Point, Bartlett's Ferry, Oliver, Eufaula and Seminole. It disgusts me to see the Atlanta area abuse our river like they do. The current flow is very important to many species of animals all the way from Helen GA to Apalachicola Florida. While I realize we must all share our resources, if they are allowed to remove the water they should be required to treat it and return it back to the river at least to the same quality that it was removed. Please do not allow them to rob our water or at least restrict the intake. Thank you for your time.	4/11/2012 1:44	Property Owner	Owner
24	I am against the reservoir.	4/11/2012 9:26	Individual	
25	The only need for this project is simple; more development of land for use in building projects. These projects offer gain for landholders, contractors and government agencies. These short-term gains come at the expense of others who depend on the Chattahoochee River that are located both downstream and across the river. This reservoir is not necessary for any other reason. Please do not pursue this project any further.	4/11/2012 9:50	Individual	
26	I live downstream from Atlanta but above Columbus. I do not think they should be allowed to hoard water. If you allow them to do it, others will soon follow. The Chattahoochee is a delicate, slightly recovering ecosystem. Please conserve it, not destroy it. Thank you.	4/11/2012 14:06	Individual	N/A
27	NO, NO, NO to the Glades Reservoir. We in Columbus have enough water problems we cannot, and anyone further south, cannot afford for another 100,000 gallons PER DAY to be taken from the river. This is crazy you bring this up after the water problems Atlanta has had over the last few years, not to mention the law suits from AL and FL over water.	4/11/2012 14:28	Property Owner	

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28	We (Columbus) already have a shortage of water and water usage, and now this is seriously being proposed. Columbus as a city has a growing population and we have the largest infantry base in the world bordering the city (FT. Benning) to whom a large population consider home. This is yet again another idea that the city of Columbus is just another small town with expendable resources.	4/11/2012 14:37	Individual	
29	We cant support the projects that are currently in use on the chattahoochee river basin WHY!!!!!! would you take additional water from the river system further harming the current lakes and WHY!!!!!! would you create yet another stakeholder just to join the multiple year lawsuits it makes no sense to me until the West point project and Lanier are able to be managed according to the congressional charter I strongly oppose any new reservoir being created.	4/12/2012 15:56	Property Owner	
30	I am completely against the development of a new reservoir. As it is there is currently not enough water to go around. By adding another amenity reservoir a whole nother group of stakeholders are added to the current mess. As is it has been more than difficult to manage the water in the chattahoochee basin.	4/12/2012 21:15	Individual	
31	<p>Project purpose-The Corps needs to adequately vet the true intent of this project. Is it really a water supply reservoir or is it an amenity reservoir hidden under the guise of a supply reservoir? Adjacent land use plans must be thoroughly reviewed and made public prior to Corps permitting. If Glade Shoals is a true water supply reservoir, then for regional security the applicant must be required to install a substantial natural undisturbed buffer of at least 300 feet and install chain link fence with a barbed wire cap around the entire project boundary between the water line and outer edge of the buffer to assure no recreational use, and to protect the resource from any unwanted influence. No recreational access should be allowed at all.</p> <p>In scoping the Corps must consider all other alternatives including "no build", seeking water from other resources, pump back options using treated wastewater (direct and indirect), pumping water north from other Corps lakes to meet M+I needs (i.e raising West Point lake storage level minimums and pumping water north from West Point to Lanier as an alternative).</p> <p>As part of scoping the Corps must investigate whether adding water supply to sustain 800,000 people in Hall County is even feasible at all. Simply saying- we will grow that much does not mean it will or should happen- and points to pie in the sky preparation and consideration of growth management. Such proposed growth has associated impacts such as capital expense for school, transportation, medical systems, governance systems etc. It is unknown whether hall County has any reasonable hope of funding an sustaining such growth with its existing infrastructure systems and land mass. Simply allowing the permit to proceed with a "build it and they will come" approach to development does not account for any realistic feasibility of sustaining such exponential growth, thus wasting water- a limited resource of the ACF. Considering the limited availability of water resources in the northern Chattahoochee basin, an alternative of encouraging growth southwest of Atlanta by the state should be a more reasonable alternative. The basin is larger and properly managed water resources southwest of the metro area may offer more realistic support for growth.</p> <p>Since the Corps can not currently meet of the authorized purposes of the existing resources the ACF system (i.e fish and wildlife development on West Point lake and general recreation on West Point Lake), the Corps must question whether its permitting of any additional storage for water allocation in any other part of the basin is wise or even legal.</p> <p>The cumulative impact of permitting water storage for speculative growth in Hall County must be weighed against needs of the entire basin. Simply loading massive population growth into a small corner of the basin and transferring available water in the basin to that speculative growth location at the expense of the entire basin can not be tolerated. In addition the project can not be assessed simply on its own merits (or lack thereof). It must be assessed against the planned and potential additional of ALL contemplated reservoir additions and expansions on the ACF system. Simply choking off all the tributaries that feed the main channel of the Chattahoochee a bit at a time will only lead to the destruction of flow and environmental catastrophe a piece at a time. That cumulative impact must be totally understood by all stakeholders in the ACF and the governments of the basin.</p>	4/14/2012 6:58	Individual	US citizen and ACF stakeholder
32	The Downstream flow study represented seems to be predicated with the Magnusson ruling as a baseline. Such analysis is useless and of no value in that the ruling has been overturned. No projects on the ACF should be authorized until such time as the Mobile district has established a new Water Control Plan for the basin and vetted such document fully under NEPA. Then and only then should any permits be considered by either Mobile or Savannah districts.	4/14/2012 6:58	Individual	US citizen and ACF stakeholder
33	Recreation: Existing Congressionally authorized purposes are not being met or fulfilled. As part of the process scoping must include an analysis of how the project would repair or improve-- not detract-- from the ability of the Corps to achieve those purposes on its existing reservoirs.	4/14/2012 6:58	Individual	US citizen and ACF stakeholder

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34	Fish and Wildlife Development on West Point is also a authorized purpose that is not currently being met. When the ACF system is dry, the Corps must often forfeit spawn operations or sustained elevations for the spawn) to meet downstream flows. Sacrificing this authorized purpose has devastating impacts on the West Point Lake fishery. Withholding water at Glade Shoals during dry weather can only exacerbate this problem.	4/15/2012 18:20	Individual	
35	Glade Shoals operations. If approved, during dry weather the Corps must require Glade Shoals to utilize its entire pool of water, including any dead pool, to sustain water elevations and flows downstream so the Corps can meet authorized purposes in its downstream reservoirs.	4/16/2012 8:32	Regional Agency	Cobb County-Marietta Water Authority
36	Any new storage such as Glade Shoals, in the ACF basin, must be required to utilize its entire storage capacity to first and foremost meet requires flows at JWLD and the Chattahoochee gage as may be required pursuant to the RIOP.	4/16/2012 8:42		ACF Stakeholders, Inc.
37	The cumulative effects of this proposed project are potentially massive and at this time are poorly understood. It is incumbent on the Corps and applicant to satisfy the legal; requirement of NEPA to thoroughly vet these impacts. At a minimum it would seem that the Corps should first be able to guarantee it can and will meet current authorized purposes at its existing reservoirs before permitting new upstream storage on the system. If such storage is eventually authorized the corps must assure that ALL downstream authorized purposes are met before allowing one drop of water to be stored in a new reservoir.	4/16/2012 11:28	City	City of Oakwood
38	<p>Dear Mr. Morgan,</p> <p>The Chattahoochee RiverWarden is a 501(c)(3) non-profit organization that represents over 200 stakeholders in the middle Chattahoochee River region. Chattahoochee RiverWarden uses science, education and advocacy for the protection and stewardship of the middle Chattahoochee River and its tributaries. The water of the Chattahoochee River is a natural resource essential to the long term health, economic development and sustainability of our region. The USACE is currently reviewing a 404 permit application for Glades Reservoir that has been submitted by Hall County, GA. As a stakeholder in the Chattahoochee River system, our organization would like to point out several issues that we feel that the USACE must address in the permitting process.</p> <ol style="list-style-type: none"> 1.The Apalachicola, Chattahoochee and Flint River system has been in litigation for over 22 years between the states of Georgia, Alabama, and Florida plus other affected stakeholders. The issuance of a permit by the USACE for the Glades Reservoir should not be considered until all cases in the litigation have been resolved. 2.The Chattahoochee River basin system has not been scientifically modeled to include the damming of Flat Creek, a tributary of the Chattahoochee River, and the ecological impact thereon. Neither has the withdrawal of an unspecified amount of water out of the Chattahoochee to supplement the proposed 850 acre reservoir been scientifically modeled nor its ecological impact assessed. 3.The project is designed to withdraw water from the Chattahoochee River when "adequate flows" are available. How is "adequate flows" defined and who decides when adequate flows are available for withdrawal? 4.Conversely, water would be released back into the Chattahoochee River from the proposed Glades Reservoir when insufficient flow occurs. How is "insufficient flow" defined and who triggers the return of water back to the river? 5.The project need is based on a proposed population of 800,000 in 2060. The 2010 US Census data from 2010 shows Hall County population to be 179,684, a 2.9% per annum growth over the ten year period from 2000-2010 (approximately 40,000 people). Assuming a growth rate of 40,000 people a decade for five decades (2010-2060) the population would be expected to increase to approximately 379,684 people. This is less than half the projected 800,000 people to be served in 2060 that is assumed by the project! 6.The project proposes to transfer water from the Glades Reservoir to the Cedar Creek Reservoir as needed. However, after water from the Cedar Creek Reservoir is used for municipal purposes by the City of Gainesville, it will be discharged into the Oconee River Basin, not the Chattahoochee Basin from where it was withdrawn. Scientific studies have not been done on the effect such interbasin transfers have on aquatic life and overall environmental health of the receiving basin. 7.The land surrounding the Glades project site is owned by a single landowner. The application assumes that the Glades Reservoir will be built and operated to benefit Cedar Creek Reservoir which has a permitted safe yield of 7.5 mgd and is permitted to receive up to 20 mgd in diversions from the North Oconee River. The Glade Reservoir project proposes to add an additional 86.4 mgd to the Cedar Creek Reservoir which is in reality too small to receive anywhere close to that amount from Glades Reservoir. This means in essence the Glades Reservoir will remain basically full except in catastrophic drought conditions far in the unforeseeable future leading us to believe that the Glades Reservoir project is in fact an amenities lake first and foremost, not a water supply reservoir. The primary and largest beneficiary of such an amenities lake will be the single landowner and not the future water users of Hall County. 8.The projections of water needs to the year 2060 for Hall County far exceed the amount projected by the North Georgia Water Planning District. 9.No measures of water conservation have been proposed by Hall County as required by statute.The Chattahoochee RiverWarden truly appreciates the 	4/16/2012 13:34	Non Governmental Organization	Chattahoochee RiverWarden

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	opportunity to make comments to the USACE. The USACE must protect all interests up and down the Chattahoochee River in the NEPA process. We strongly oppose this new additional reservoir in the Chattahoochee River system.			

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39	<p>To: USACE Savannah District Reference: Glades Reservoir 404 Permit Application #SAS-2007-00388</p> <p>The Lake Harding Association (LHA) is a 501c3 corporation that represent over 450 homeowners on Lake Harding that is owned and operated by Georgia Power. The Lake Harding Association was organized in 1986 as a non-profit corporation for the purpose of bringing together all residents of our lake community as a group to promote a community atmosphere, both socially and as an organized voice in matters that might impact our lives and the unique environment of our lake. Lake Harding is a Georgia Power Lake that is located south of West Point Lake and north of Columbus GA on the Chattahoochee River. The USACE is currently reviewing a 404 permit application for Glades Reservoir that has been submitted by Hall County, GA. As a stakeholder in the Chattahoochee River system, our organization would like to point out several issues that we feel that the USACE must address in the EIS process</p> <ol style="list-style-type: none"> 1.The Apalachicola, Chattahoochee and Flint River system has been in litigation for over 22 years between the states of Georgia, Alabama, and Florida plus other affected parties. The issuance of a permit by the USACE for the Glades Reservoir should not be considered until all cases in the litigation have been resolved. 2.The potential impact (as reported by the applicant) of the Glades Reservoir on lake levels has only been studied for Lake Lanier and West Point Lake. All lakes on the Chattahoochee River should be studied and their impact be known. 3.Glades Reservoir is called a water supply reservoir but no water treatment facility is proposed. Therefore, the lake is truly an amenity lake and is not necessary per statute. 4.No environmental assessment has been undertaken on the 18 miles of pipeline and its damage. 5.The proposal states that water will be piped to Cedar Creek Reservoir but the City of Gainesville GA who owns the majority interest in Cedar Creek Reservoir has objected to have their reservoir included as part of the Glades Reservoir project. This makes Glades an amenity lake. 6.If Glades was built and water was pumped to the Cedar Creek Reservoir, the distributed water would be waste water treated and discharged into the Oconee River system. No studies have been done to scientifically understand the impact on either the donor or receiving basin. 7.Currently, the Chattahoochee River is losing 70 million gallons of water per day due to inter-basin transfers. The loss of an additional 80 million gallons per day increases the downstream probability of water shortages. 8.Hall County has not proposed any water conservation plans as required by statute. <p>The Lake Harding Association appreciates the opportunity to make comments to the USACE. As stakeholders, the USACE must protect all interest in the NEPA process. We strongly oppose this new additional reservoir in the Chattahoochee River system.</p>	4/16/2012 13:37	Non Governmental Organization	Chattahoochee RiverWarden

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40	<p>Lake Lanier Association Public Comments for the Glades Reservoir Scoping Process</p> <p>The mission for the Lake Lanier Association (LLA), a 46 year old Lake advocacy organization, includes keeping the Lake full and clean in support of its economic contribution to North Georgia. We, the LLA, have begun our review of the Glades reservoir project sponsored by the Hall County Board of Commissioners. After attending the US Army Corps of Engineers Public Agency and Scoping Meeting in Gainesville on Wednesday, March 20, we have some observations. As background, the Glades project began in 2007. The proposed reservoir would have stored available natural stream flow from Flat Creek and would have been intended to supplement existing water supplies from Lake Lanier (through the City of Gainesville water system), to meet the needs of eastern and northern Hall County through the year 2060. It was to provide 6.4 million gallons per day (MGD) of water. In 2009 Judge Magnuson issued a ruling as part of the Tri-States water war litigation that Lake Lanier was not authorized to provide water supply for North Georgia and the city of Atlanta which was subsequently overturned by the 11th Circuit Court of Appeals. In spite of that ruling, the Glades project grew from 6.4 MGD to 80 MGD. Today, the plan is for an 850 acre reservoir that will be used to augment the flow to the Cedar Creek Reservoir during periods of low flow. Nominally at its maximum capacity, 80 MGD will be withdrawn directly from the Chattahoochee to supply water to the Cedar Creek Reservoir in Hall County only. The Glades Reservoir will only be used to "make up" inadequate flow during low flow periods. With this dramatic proposed water withdrawal from the main Lake Lanier water supply, we feel the following questions need to be considered and evaluated:</p> <p>1.) What is the impact on Lake Lanier of taking 80 MGD from the main Lanier input river and transferring the flow to another basin (Oconee). Further, the management of this water flowing into and out of the Cedar Creek reservoir will be managed by Hall County, not the Corps of Engineers. What will be the Hall County management strategy for water flows and utilization? The assumption that 70% of the water withdrawn from the Chattahoochee will be returned to Lake Lanier presupposes knowledge about the makeup of the population growth residential development in the area dependent on the Cedar Creek Reservoir. If there is a heavy concentration of septic tank based residential areas, then this assumption is questionable.</p> <p>2.) The Hall County proposal estimates that the only impact on Lanier would be a reduction in the water level 3 ½ inches. We feel that an independent evaluation of this impact would provide not just an "inches average" reduction but should include the maximum impact and frequency on Lanier which has been 21 feet water loss during drought conditions. (See comment 5 below)</p> <p>3.) Last June the Magnuson ruling was overturned by the 11th Circuit court of appeals, and that decision was "en banc" supported by all 10 of the appellate court Judges. We now ask "is it really necessary to increase the Glades project to 80 MGD, now that Lake Lanier has been validated and authorized as water supply purpose?"</p> <p>4.) North and Eastern Hall County are not the only growth areas above Lake Lanier. Habersham and White Counties will no doubt experience significant growth along with Hall County. The total impact of all of the growth on the Lake Lanier recreation economy should be evaluated.</p> <p>5.) The Schnabel Engineering report on downstream flow impacts contains two statements that need clarification before any permit is issued:</p> <p>a. On Page 5 the statement is made that "Minimum In-stream Flow (MIF) to be released from the Glades Reservoir would be the lesser of 3.0 mgd (4.6 cfs) or the natural inflow to the reservoir". This refers to the releases from Glades into Flat Creek. However, by stating that it will be the 'lesser' of the two values, if the natural inflow to the reservoir is only 2.0 mgd, then that would be the only amount required to be released. If the natural inflow were to be 0 mgd during a severe drought, then there would be no water released from Glades.</p> <p>b. In the Background section of the cover letter to the Schnabel report it is stated that "When insufficient flow is available, releases from Glades Reservoir would provide make-up water to meet in-stream flow requirements in the Chattahoochee River while maintaining Minimum Instream Flows (MIF) of the lesser of Annual 7Q10 flows (approximately 22% of average annual daily flow) or natural flows in the Chattahoochee River." Similar to item a) above, by stating that the MIF will be the 'lesser' of the 7Q10 flows or the 'natural flows' the interpretation of this is that if the 'natural flows' are less than the 7Q10 flows, then there would be no obligation of the operation of Glades to release any additional water from Glades Reservoir into the Chattahoochee River. If these two provisions form the basis of the modeling produced by Schnabel Engineering, it raises questions about the conclusions arrived at by the modeling. The LLA has been an advocate for raising the full pool level of Lake Lanier by 2 feet in order to create additional stored water for use by the metropolitan Atlanta population, industry and downstream requirements. However we do not position the "1073 initiative" in contravention to the Glades Reservoir. We fundamentally believe that any proposed plan has to stand on its own merits and one is not a substitute for the other. In summary, we are convinced that significant detailed study is needed to determine the impacts on Lanier and downstream stakeholders of creating a large diversion of the main water source for North Georgia and other water users. We believe that there are sufficient questions related to the current application to warrant further study.</p>	4/16/2012 18:43	Non Governmental Organization	Lake Lanier Association

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41	<p>As a Lake Lanier resident, I am 100% in favor of adding capacity to the Chattahoochie basin, IF managed correctly. Having said that, I do not believe that the project will be successful, if both the Glades Reservoir and Lake Lanier are not governed by the SAME body with the SAME purpose And SAME goals.</p> <p>If I understand the proposal correctly, the two reservoirs will be managed separately with potentially competing objectives. Therefore, we are AGAINST the Glades Reservoir proposal.</p> <p>Additionally, large amounts of water will be pumped from one river system to another. I reality that idea will cause more problems than it will resolve. That, inevitably, will cause "water wars" within north Georgia.</p> <p>We are finally making progress with the existing "water wars" with Florida and Alabama. The current proposal would be a step in the wrong direction with regards to the management of Lake Lanier and Metro Atlanta's water problems.</p> <p>In summary, we are strongly AGAINST the current Glades Reservoir proposal.</p>	4/16/2012 22:19	Property Owner	
42	<p>Clearly, more capacity is needed in the Chattahoochie basin. Lake Lanier has untapped capacity. Raising normal to 1073' is a viable alternative to Glades Reservoir, which has little to no cost.</p>	4/16/2012 22:19	Property Owner	
43	<p>These comments will be sent in hard copy form. It does not appear that the figures were incorporated into this commenting venue. April 16, 2012</p> <p>Mr. Richard Morgan Colonel Steven J. Roemhildt Regulatory Division District Commander Savannah District Mobile District US Army Corps of Engineers US Army Corps of Engineers 100 West Oglethorpe Avenue 109 St. Joseph Street Savannah, GA 31401 Mobile, AL 36602-3630 Re: Glades Reservoir-Hall County, GA-Flat Creek: Permit Application #SAS-2007-00388 Dear Mr. Morgan and Colonel Roemhildt: On behalf of hundreds of our members in the Apalachicola, Chattahoochee, and Flint (ACF) River Basin, Apalachicola Riverkeeper appreciates the Corps determination that an EIS is required for the referenced project. We continue to believe that the referenced application should be unconditionally denied for reasons enumerated in the letter below. The interstate nature of the ACF River Basin, the authorizations to the US Army Corps of Engineers (Corps) and the State of Georgia pursuant to Sections 401 and 404 of the Clean Water Act (33 U.S.C. §§ 1341, 1344), and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 403), require consideration of the cumulative effects on downstream users in Florida. Relevant uses of our members potentially affected by this project include, but are not limited to: conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, consideration of property ownership and in general, the needs and welfare of the people. Our use of the waters of the Apalachicola will be diminished by additional and cumulate impacts of further withdrawals and depletions from the ACF System related to the Glades Reservoir. Current conditions and water use in the basin make it practically and physically impossible for the EIS to demonstrate a feasible rationale for the project.</p> <p>The following comments illustrate the impacts that will ultimately arise from the issuance of a Section 404(b) dredge and fill permit by the US Army Corps of Engineers and a Section 401 water quality certification by the Georgia Environmental Protection Division. The US Supreme Court recognized the application of the Clean Water Act to issues of water quantity in PUD No.1 of Jefferson County and City of Tacoma v. Washington Department of Ecology, 114 S.Ct. 1900 (1994). In the PUD, the Court made clear that the Clean Water Act definition of pollution as "the man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water (33 U.S.C. 1362(19) and the requirement for the Environmental Protection Agency to seek information about "processes, procedures, and methods to control pollution resulting from ... changes in the movement, flow, or circulation of any navigable waters or ground waters, including changes caused by the construction of dams, levees, channels, causeways, or flow diversion facilities" authorized the regulation of impacts from alterations of water quantity.</p> <p>Furthermore, the water use promoted by the construction of the Glades Reservoir will impact the operations the Mobile District of the U.S. Army Corps of Engineers (Mobile District) implement on the ACF River Basin. Thru direct withdrawal and evaporation from the existence of the reservoir the project will impact the Mobile District's operational plan and Water Control Manual which has been under revision for over 20 years. The impacts therefore come under the jurisdiction of the Mobile District and must be part of the consideration to that management plan. This will require development of an Instream Flow Assessment to determine the needs of the downstream users including, but not limited to, the Apalachicola River and Bay.</p> <p>Finally, our comments focus on the requirement of the National Environmental Policy Act ("NEPA") (42 U.S.C. § 4332) that a detailed statement by the responsible official be prepared for this major Federal action that will significantly affect the quality of the human environment. To satisfy NEPA, the Corps must consider, among other things: (1) impacts that may be both beneficial and adverse, (2) unique characteristics of the geographic area such as proximity to wetlands, (3) the degree to which the effects on the quality of the human environment are likely to be highly controversial, and (4) the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. Moreover, the Corps must analyze the direct, indirect, and cumulative impacts. This will also require development of an Instream Flow Assessment to determine the needs of the downstream users including, but not limited to, the Apalachicola</p>	4/17/2012 7:49	Non Governmental Organization	Apalachicola Riverkeeper

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	<p>River and Bay.</p> <p>Reduction of Downstream Flows and Associated Impacts</p> <p>The divergence (30-38% decline) from baseline flows that existed before dams were constructed on the rivers of the ACF River System and described in Attachment 1 has resulted in significant impacts to Apalachicola River, Floodplain, and Bay. The existence and proposed uses for the Glades Reservoir will further reduce flows downstream and exacerbate the cumulative ecological, cultural and economic impacts to Apalachicola River, Floodplain, and Bay area.</p> <p>River level declines have impacted the Apalachicola Floodplain and River by reducing the connection of the river to the floodplain and inundation durations. The reduced and lost connectivity has resulted in significant loss of millions of trees, fish and wildlife habitat, and fish and wildlife. The USGS has issued reports (Professional Paper 1594, Scientific Investigations Report 2008-5062, Scientific Investigations Report 2008-5173) which establish impacts that have and are occurring to the Apalachicola River due to reductions in flow attributable to actions of the Corps' and the State of Georgia. Significant losses of endangered and threatened species have also been documented by the State of Florida. Impacts to the productivity of Apalachicola Bay from reduced freshwater flows resulted in lost production of marine species including fish, shell fish, and wildlife which brought the Bay close to a near disastrous unraveling of the food web. These effects have been described in the report: Importance of River Flow to the Apalachicola River-Bay System (Robert J. Livingston, Department of Biological Science, Florida State University, Tallahassee, Florida, September 2008). Freshwater declines during the recent drought increased salinity levels in the Bay and extended the duration of the time that high salinities persisted in the Bay resulting in 80% of the oyster bars being decimated by predators that inundate the bars during periods of higher salinity. Water Quality Impacts from Reduced Flows</p> <p>Reduced flows have altered water and habitat quality in the river, floodplain and bay. Reduced river levels have cut off flows to the floodplain and sloughs, disconnected backwater swamps for long periods of time, and caused die offs of fish and shellfish due to low DO, increased temperature, stagnant conditions and even completely dried up sloughs and swamps. Increases in Bay salinity and temperatures also precipitated the reductions and loss of oysters, crab, fish and shrimp species.</p> <p>Cumulative Impacts of Water Allocation in Georgia</p> <p>Water allocation by the State of Georgia has been improving, but is inconsistent and relatively uncontrolled with no consideration of the instream flow needs when it comes to allocation of water. The State of Georgia is not willing or prepared to determine what allocations are appropriate or can be made without causing harm to downstream users. This particular proposed reservoir will deplete the Chattahoochee River System by an additional 72 MGD. Evaporation will further increase this loss during the warmer months of the year. Increases in water temperature and reductions in DO will be associated with the reservoir after constructed and filled. While the depletion and impacts to downstream users may seem small in comparison to other users, it is certain that the impacts described above demonstrate that over-allocation of the water resources has occurred at existing water use levels. Additional depletions from the system will exacerbate those impacts. The State of Georgia should not justify the allocation of additional withdrawals from the system knowing that such impacts are occurring to downstream users.</p> <p>The applicant makes a determination of based on an instream flow of 7Q10 as the minimum flow and dam release for Flat Creek. The use of the 7Q10 flow is inadequate to sustain ecological resources of a stream and should not be acceptable to the Corps or the State of Georgia as a reasonable component to measure "safe yield" from the creek. The Instream Flow Council stated in its publication "Instream Flows for Riverine Resource Stewardship - Revised Edition" (Instream Flow Council-2002, Revised Edition 2004) that "Use of the 7Q10 persists because it favors off-stream water uses. However, it does so by sacrificing the fish and wildlife resources that belong to the public and over which government has a stewardship responsibility".</p> <p>Cumulative Impacts of Water Management by the U.S. Army Corps of Engineers (Corps)</p> <p>The Mobile District of the Corps manages 5 reservoirs on the Chattahoochee and Flint Rivers. The allocation of waters by the State of Georgia for the Glades Reservoir will impact the Corps ability to meet its congressionally authorized purposes under the Water Supply Act. General Joseph Schroedel, South Atlantic Division Commander, stated before the National Research Council that there is not enough water to meet existing needs in the ACF System. It is therefore inconsistent with Corps Policy and Guidelines for the Corps to allow further withdrawals from the ACF over which it has authority. In order to determine downstream impacts to the Apalachicola River and Bay, it is necessary to perform and Ecological Instream Flow Assessment to determine the freshwater flows required to sustain the resources and economies of our region.</p> <p>The "intensity" of the cumulative impacts of water allocation in Georgia and reservoir management on the ACF must also be analyzed by the Corps. These impacts include: "The degree to which the proposed action affects public health or safety"-because of the potentially significant adverse effects on downstream water quality due to lower flows in the Apalachicola River and higher salinity in Apalachicola Bay, this is of heightened concern;"The degree to which the effects on the quality of the human environment are likely to be highly controversial"-given the intense ongoing tri-state water wars, this application is clearly controversial;"The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks"-given the uncertainty regarding future allocation out of Lake Lanier for meeting metro Atlanta water supply needs, potential for future droughts, and climate change, the magnitude of impacts on the Apalachicola River and Bay may in fact prove to be significant;"Whether the action is related to other actions with individually insignificant but cumulatively significant impacts"-of particular concern is the cumulative effect of this withdrawal along with other past, present, and future withdrawals on the Apalachicola River and Bay's water and habitat quality, recreation, commercial productivity and listed species;"The</p>			

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	<p>degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973"-of particular concern here is the potential adverse effects of reduced flow in the Apalachicola River on federally listed mussels (purple bankclimber, fat three-ridge, Chipola slabshell) and the Gulf sturgeon; and "Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment"- the proposed action threatens to violate the federal Clean Water Act, National Environmental Policy Act, Endangered Species Act, and Water Supply Act. The Water Resources Act by the Florida Legislature in 1972 defines the minimum flow for a given watercourse as the limit at which further withdrawals would be "significantly harmful" to the water resources or ecology of the area. Further withdrawals will in fact violate this state law, which is already violated based on existing impacts from current withdrawals in the state of Georgia. Endangered Species ActThe Endangered Species Act requires formal consultation for federal actions that "may affect" listed species or critical habitat. There are at least three federally listed mussels (purple bankclimber, fat three-ridge, Chipola slabshell) and the Gulf sturgeon within the Apalachicola River that may be affected by the proposed action. Therefore, the Corps must initiate formal consultation with the U.S. Fish and Wildlife Service on additional withdrawals. Moreover, because downstream impacts may impact ACF operations extending as far as Apalachicola Bay, the Corps also must formally consult with the NOAA Fisheries Service as to impacts the proposed project may have on the federally listed Gulf sturgeon.Loss of Benefits to Members of the Apalachicola RiverkeeperThese aforementioned documented impacts to the Apalachicola River and Bay have diminished and harmed our member's ability to enjoy and benefit from the use of the Apalachicola River and Bay. Our members hike, boat, fish, swim, hunt, bird watch, timber, commercially harvest honey, oyster, shrimp, crab, flounder and other Gulf marine species, and further benefit from the ecosystem services (ATTACHMENT 2) provided by the ACF System. These activities all rely on a healthy Apalachicola River and Bay ecosystem that is dependent on flows that sustain that ecosystem. Without thorough documentation using the best scientific methods available that such impacts are not a result of reduced freshwater flows from the Chattahoochee and Flint rivers, it is inconsistent with the authorizations provided to the Corps and/or the State of Georgia, pursuant to Sections 401 and 404 of the Clean Water Act (33 U.S.C. §§ 1341, 1344), and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 403) to authorize any further reduction of flows downstream. We respectfully request that permitting agents that have not observed the biodiversity and productivity of this natural system make a site visit in order to better understand the critical role that flows play in sustaining the ecosystem, cultures, communities and economies that exist along the bank and shores of the Apalachicola River, Floodplain, and Bay.Sincerely, Dan TonsmeireRiverkeeperATTACHMENT 1(Pre and Post Dam Flow Comparison Hydrographs)ATTACHMENT 2ECOSYSTEM SERVICESBecause ecosystem services are not generally traded in the marketplace, their full value is not captured in the conventional economic statistics. The market value of goods and services derived from ecosystems typically reflects only the human labor, technological and managerial inputs used for their extraction, processing, transportation and distribution. A consequence of this is that the underlying natural resources may be unsustainably exploited or improperly managed.What are ecosystem services?The natural environment provides an array of ecosystem goods and services that are critical to the welfare of the human population and to the support of life generally. Following are some of the important ecosystem services that have been widely recognized (Daily, 1997) (see also, http://www.centurycommission.org/current_projects.asp):Production of agricultural food and fiber products;Forestry and fisheries production;Setting for outdoor recreational activity;Purification of air and water;Mitigation of droughts and floods;Generation and preservation of soils and renewal of their fertility;Detoxification and decomposition of wastes;Pollination of crops and natural vegetation;Dispersal of seeds;Cycling and movement of nutrients;Control of potential agricultural pests;Maintenance of biodiversity;Protection of coastal shores from erosion by waves;Protection from the sun's harmful ultraviolet rays;Partial stabilization of climate;Moderation of weather extremes and their impacts.</p> <p>Nature furnishes these services to human society as an outcome of the normal functioning of healthy ecosystems. Flows of materials, energy and information arise from the natural capital stocks of plants, animals, minerals, and atmospheric gases, which may be periodically accumulated or depleted by both natural cycles and human activities. Ecosystems have evolved over billions of years to be highly efficient and robust. Some of these ecosystem services provided by nature are critical and irreplaceable. Others may be accomplished by engineered human systems only at great expense.</p> <p>Reference http://www.centurycommission.org/current_projects.asp and go to CC UF Applied Sustainability, "Review of Environmental, Social, and Economic Concepts for Sustainable Development in Florida" edited by Dr. Stephen S. Mulkey, Chair at UF of People and Land Use Strategies (PLUS) Workgroup", and to "Protecting Ecosystem Services in Florida" September 1, 2006 by Alan W. Hodges"</p>			

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44	<p>I have followed the Glades Reservoir project for some time. Most recently, I attended a public meeting at Gainesville College, and became convinced that the entire idea of Glades is based on faulty data and incorrect assumptions about population growth. This brings into question the entire idea and the reasons and motives its supporters have for their support and why taxpayers should be asked to put up nearly \$300 million. It took the last 50 years for Hall County to add 130,000 residents. Yet, according to 'information' presented at this most recent public meeting, we are expected to believe that Hall will add 600,000 residents over the next 50 years - a 400% increase in growth rate - and therefore, the need for Glades. No basis for this tremendous increase is offered, no background data are offered, no modeling of any sort that could possibly justify such a number is presented. In fact, as the US economy continues to sputter and show no signs of sustained strength and viability, such an estimate becomes even more ridiculous. This population growth estimate is not based on anything real, and therefore, the taxpayers are being misled. The other obvious weakness in the case for Glades is that a two foot increase in Lanier will store just as much water (for no additional investment by taxpayers) as Glades. If and when the need arises for additional water supply, Hall County and Gainesville should simply strike a compromise with the Corps of Engineers and secure additional water from Lanier. To spend \$300 million to take water from the Chattahoochee before it reaches Lanier, rather than just simply take it out of Lanier, is an egregious waste of the taxpayer's money. And of course, no one ever mentions water conservation. We can all use less water and therefore avoid building such an expensive, destructive, and unneeded project for many years. More intelligent solutions can be implemented in the meantime.</p>	4/17/2012 8:28		
45	<p>As a resident of Troup County, I am opposed to another reduction/control of waters from the Chattahoochee River. We have a constant struggle already with maintaining a suitable water level. Adding another reservoir which would be supplied by pumping water from the river would be COUNTERPRODUCTIVE.</p>	4/17/2012 8:40	Non Governmental Organization	West Point Lake Coalition
46	<ol style="list-style-type: none"> 1. Population projections used by the county are unrealistically high due to the slow economy. This fact had been stated in the Atlanta Journal & Constitution and Gainesville Times in recent articles. 2. The Cedar Creek Reservoir with H2O from the Oconee would meet a realistic increased population in Hall County for many years to come. 3. Raising the level of Lake Lanier would be a practical way to meet increases that could not be met by the Cedar Creek Reservoir in the distant future. 4. The Glades Farm Reservoir would set a dangerous precedent. White County & Habersham County could build reservoirs removing further H2O from the Chattahoochee. Then where do the users downstream from Lake Lanier get their needed amounts of H2O? 5. Lake Lanier is a reservoir already built. It makes more sense to raise the level of an existing reservoir than to build Glade Farm Reservoir at great expense to H2O users and destruction of beautiful farm and creek land with their existing plant and animal habitats. 6. Since the county has no viable business plan for paying for this Glades Farm Reservoir Project, H2O users including the Poultry Processing Plants will pay for it through excessive H2O rates. These increases would force the poultry plants to move out of Hall County taking a very large number of jobs with them. The result would be devastating to the water system and increase the H2O rates even further since the poultry plants use a large percentage of the H2O. 7. Gainesville's source of H2O is Lake Lanier. Gainesville does not need to be put into position to be forced to buy H2O from Glades Farm at greatly increased cost. 	4/17/2012 8:41		
47	<p>The Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (USACE) 2008 Final Rule for Compensatory Mitigation for Losses of Aquatic Resources established a hierarchy for selecting compensation options that favors mitigation banks as the preferential choice. The Final Rule then ranks in-lieu fee program credits followed by permittee-responsible mitigation. Mitigation banking is the preferential option for a variety of reasons. Mitigation bank credits are not released for debiting until specific milestones associated with the protection and development are achieved, thus reducing the risk that mitigation will not be fully successful. Mitigation banks involve more rigorous scientific and technical analysis, planning and implementation than permittee-responsible mitigation. A mitigation bank requires site identification in advance, project-specific planning, and significant investment of financial resources that is often not practicable for many in-lieu-fee programs. Georgia's sole in-lieu-fee program, the Georgia Wetland and Stream Trust Fund (GWTF), has a history of poor management. The GWTF does not consistently operate in accordance with its 1997 in-lieu-fee agreement with the Corps Savannah District or with interagency guidance issued in 2000. The GWTF's longstanding noncompliance has significant adverse environmental impacts. During the time period since the GWTF began, mitigation banks in Georgia have been subject to increasingly stringent requirements and oversight to assure adequacy and effectiveness. As a result, mitigation banks now provide superior mitigation for the loss of ecological functions associated with wetland and stream impacts. Please see Exhibit A for more information regarding the GWTF's history of noncompliance. Hall County has proposed to develop a compensatory mitigation plan in accordance with the Final Rule hierarchy to offset losses in aquatic function that would result from the proposed Glades Reservoir project. The proposed Glades Reservoir is an approximately 850-acre reservoir located on Flat Creek in the Upper Chattahoochee River Basin. The Reservoir is proposed to operate as part of a system with the existing Cedar Creek reservoir and pumping from the Chattahoochee River. According to the Hall County Glades Mitigation Plan (Exhibit B), the pipeline from Glades Reservoir to the Chattahoochee River will</p>	4/17/2012 10:04	Business	Mitigation Management

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	<p>impact 100 linear feet, and the pipeline from the Chattahoochee River intake to the Cedar Creek reservoir will impact 730 linear feet. The Reservoir itself will impact 39.2 acres of jurisdictional wetlands and almost 94,120 linear feet of streams. Under the 2004 Savannah District SOP, the Glades Reservoir will require a total of 470,872.52 stream credits (468,877.02 for the reservoir, and 1,995.50 for the pipelines) and 290.39 wetland credits. The following tables list the current mitigation banks in the Upper Chattahoochee and Middle Chattahoochee basins, along with their credit availability. Available credits are credits that have already been authorized by the Corps for sale and can currently be purchased from the mitigation bank. Remaining credits include available credits plus future credits that have already been approved by the Corps, but not yet authorized for sale. The future credits are authorized for sale as each mitigation bank meets pre-defined milestones over a 5-7 year monitoring period.</p> <p>In accordance with the Final Rule, mitigation for the Glades Reservoir impacts should be accounted for through the use of mitigation banks. According to the Hall County Mitigation Plan, the Reservoir will require a total of 470,872.52 stream credits. As seen in the above tables, there are 599,580 remaining stream credits in the Upper Chattahoochee basin (127% of need), 408,987 available stream credits in the Upper and Middle Chattahoochee basins (87% of need), and 1,877,399 remaining stream credits in the Upper and Middle Chattahoochee basins (400% of need). The Reservoir will require a total of 290.39 wetland credits. Within the Upper and Middle Chattahoochee service areas, there are currently 194 remaining wetland credits (66% of need). This equates to a deficit of approximately 100 wetland credits (34% of need). Per RIBITS, there are currently three pending banks in the Upper Chattahoochee and three pending banks in the Middle Chattahoochee. Several of these pending banks have wetland components to them, which, once approved, will increase the available and remaining wetland credits within the basin. In addition to the Upper and Middle Chattahoochee, the Upper Flint River service area is also within the Apalachicola/Chattahoochee/Flint River Basin (ACF Basin) where the proposed Glades Reservoir is located. All three service areas are within the Piedmont physiographic region. According to RIBITS, there are currently 52 available wetland credits in the Upper Flint Basin. With future releases, there are 306 remaining credits (105% of need) in the basin. Combined with credits from the Upper Chattahoochee and Middle Chattahoochee, wetland impacts for the project can be completely compensated for through the use of mitigation credits. Based on the availability of stream and wetland credits within the ACF Basin, the use of in-lieu-fee mitigation and permittee responsible mitigation is not necessary. As determined by the Final Rule, mitigation banks are the preferential compensation option because they best comply with the "no net loss" objective of the Clean Water Act. We strongly urge Hall County and USACE to comply with the standards of the Final Rule and utilize mitigation banks for compensation for impacts associated with Glades Reservoir. The Tables and Exhibits have been removed from these online comments for formatting purposes. The complete comments, including Tables and Exhibits, were submitted via email to info@gladesreservoir.com and via US Mail to the following address: ATTN Richard Morgan U.S. Army Corps of Engineers-Savannah District 100 West Oglethorpe Avenue Savannah, GA 31401-3640</p>			
48	<p>I really don't understand the need for this reservoir. Why can't the level of Lake Lanier be raised? Even if some money had to be spent to allow this to happen, it would be extremely cheaper than Glades.</p> <p>What about Cedar Creek Reservoir that already exists? From what I understand, it is not even being used. Why build another, very expensive reservoir?</p> <p>Also, I think it is past time for our country to start emphasizing conserving water, in the home and the workplace. If water conservation is not made more of a priority, it's not going to matter that we raise lake levels, build reservoirs.</p> <p>I am strongly against spending money to build Glades.</p>	4/17/2012 10:11		

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49	<p>Dear Mr. Morgan: The City of LaGrange is a public utility in the middle Chattahoochee region that strives to operate in a responsible and environmentally conscious manner. As a downstream interest in the proposed Glades project, the following information must be considered: The ACF basin, which West Point Lake is a part of, has long been stressed due to low river flows. Subsequent the level of West Point Lake has suffered severe reductions over the past several years as a result of these reduced flows downstream from metropolitan Atlanta. The proposed Glades Reservoir would result in a net reduction of flow into the basin. Industry, power generation, municipal water supply operations, recreation, and environmental health are all dependent on the Chattahoochee River water levels. The USACE is working to complete an updated water control manual. We request that the USACE review this document and ensure that adequate water has been set aside to account for the water lost due to the proposed reservoir, and that all other downstream demands can likewise be met. Congressional authorizations for navigation and recreation are included as expressed purposes of federal projects within our area of the river, and specifically for West Point Lake. These activities have long been either curtailed or eliminated due to flow restrictions in the area. As the single largest economic driver in Troup County, West Point Lake is the critical driver for future recreational and industrial growth. Additionally, municipal water supply operations and environmental issues have required intense management to avoid further harm to middle Chattahoochee stakeholders. Further upstream water withdrawals, with subsequent reduced flows will restrict economic growth in our area. Any upstream reservoir proposal resulting in reduced river flows will cause further harm to the economic and environmental health of our downstream region. An overall management plan for the Chattahoochee River, including related water withdrawals, should be adopted to address both statewide and regional needs. The aforementioned USACE operating plan, as well as an ACF Stakeholders initiative, is currently developing such plans. We urge the USACE to follow all NEPA guidelines in establishing the overall impact to the basin of another reservoir. Approval of the Glades project is premature and seemingly unnecessary based on Lake Lanier being approved for municipal water supply for the City of Atlanta. We therefore are opposed to its approval.</p>	4/17/2012 10:32	City	City of LaGrange
50	<p>The National Park Service (NPS) has reviewed the Notice of Intent to prepare an Environmental Impact Statement for a proposed water supply reservoir project to be located in Hall County, Georgia. Based on the information provided in the February 17, 2012, Notice of Intent, the NPS has no comments at this time. We appreciate the opportunity to provide input regarding the resources and issues to be evaluated during the application process.</p>	4/17/2012 10:50	Federal Agency	National Park Service, Southeast Regional Office
51	<p>We would like to comment on the planned location of the pipeline that will be running from Glades down the 365 Corridor and what parcels of property that it will affect. We own the property located on the corner of Hwy 365 and Athens Street which is the main thoroughfare from Hwy 365 into Lula and then on to Homer, etc. Hall County Parcel # 09073-000002. Approx 7.63 acres. As we understand from the meetings and discussions with both the Developers and the Army Corp of Engineers, there is not a definite plan for exactly which side of 365 the pipeline will run in reference to our property. As I understand from talking with Rochester & Assoc it is actually at this point being shown literally down the middle of Hwy 365. Of course we know that it will go to one side or the other. We would like to request that our property is not used for the pipeline for the reasons below: Being that we have road frontage both on Athens Street and on Hwy 365, we are already dealing with "Right of Way" issues on both sides. We also know without a doubt that we will also be dealing with an Acceleration Lane that will have to be constructed due to the on going traffic fatalities and wrecks on Hwy 365. This would be for traffic turning out of Athens Street onto Hwy 365N toward Cornelia. (Our property is on the right if traffic is turning right onto Hwy 365.) With all being stated above and our parcel being at Approx 7.63 acres, we do not need to lose any additional property as it would discourage any potential buyer to be able to work with the reduced area. We have our property listed for sale at this time; We purchased this property many years ago with the knowledge that we would hold it until the market was ready for it and it would help us in a major financial need. We feel that this time is now approaching from both points. Of course it will be potential commercial due to the location and the fact that there is frontage on both Athens Street and Hwy 365. Again, we respectfully ask that the pipeline be placed possibly on the other side of Hwy 365 where there is not interference with 2 major thoroughfares. We understand that it is possible that our property may not even be affected at all. On the current drawings, it is not even an issue for us; however, we felt that we really need to voice our concern. Thank you for this opportunity for our comments.</p>	4/17/2012 11:49	Property Owner	

Glades Reservoir EIS - Scoping Comments

PROJECT WEBSITE COMMENT SUBMISSIONS

Online Comment #	Comment	Date/Time Received	Affiliation Type	Affiliation Name
52	My overbiding concern is destroying forever Native American artifacts. Too much of my heritage is being destroyed all in the name of Progress. Our city and county has no compunction intearing down very good buildings and then spending millions on buildings, arenas, etc. all in the name of bringing in new tourism and new business. While our past heritage, rich as it is in this area and so many more in Georgia are being obliterated. I am strongly opposed with all that is being proposed while Gainesville is being rapidly depleted from its rich Native American history. We've seen too many huge proposed projects fail miserably in and around Gainesville. I beseech all of you have Indian blood coursing through your veins to please comment on this subject and fight what is being proposed.	4/17/2012 13:13	Individual	
53	The City of Gainesville, Ga a supposed partner in the project has publicly stated they are not in favor of this project. Gainesville has gone so far as to say they will not let their Cedar Creek reservoir be a piece of this project. If this is the case then the Corps is grossly premature in developing an EIS for a project that requires Cedar Creek.	4/17/2012 15:41	Business	Global Energy & Water Consulting, LLC
54	The Corps is grossly premature and wasting public money by exploring this option when the Corps has not completed their required task of determining their limits of authorities for use of Lake Lanier required by the Order in the 11th Circuit Court of Appeals ruling.	4/17/2012 15:41	Business	Global Energy & Water Consulting, LLC
55	The project boundaries appear to encroach on property owned by the Corps and specifically include taking of some of the flood control storage. How will the Corps mitigate this without going to Congress for reallocation of storage?	4/17/2012 15:41	Business	Global Energy & Water Consulting, LLC
56	Dear Mr. Morgan: The Middle Chattahoochee Water Coalition (MCWC) is a public/private multi-state partnership to champion equitable, optimal use and good stewardship of the water resources of the region. Our ACF basin has long been stressed due to low river flows and subsequent lake level reductions downstream from metropolitan Atlanta. The proposed Glades Reservoir would result in a net reduction of flow into the basin. Industry, power generation, municipal water supply operations, recreation, and environmental health are all dependent on the Chattahoochee River water levels. The USACE is working to complete an updated water control manual. Congressional authorizations for navigation and recreation are included as expressed purposes of federal projects within our area of the river. These activities have long been either curtailed or limited due to flow restrictions in the area. Additionally, municipal water supply operations and environmental issues have required intense management to avoid further harm to middle-reach stakeholders. In essence, further upstream water withdrawals, with subsequent reduced flows, restrict economic growth in our area. Any upstream reservoir proposal resulting in reduced river flows will cause further harm to the economic and environmental health of our downstream region. An overall management plan for the Chattahoochee River, including related water withdrawals, should be adopted to address both statewide and regional needs. The aforementioned USACE operating plan, as well as an ACF Stakeholders initiative, is currently developing such plans. Approval of the Glades project is premature. We therefore are opposed to its approval.	4/17/2012 16:21	Non Governmental Organization	Middle Chattahoochee Water Coalition
57	In the interest of brevity and ease of consideration of comments, the Southeastern Federal Power Customers, Inc. ("SeFPC"), adopts by reference each and every comment submitted by Mark Crisp of Global Energy & Water Consulting, LLC. The SeFPC concurs fully with the comments submitted by Mr. Crisp and asks the U.S. Army Corps of Engineers to respond to each accordingly.	4/17/2012 16:46	Non Governmental Organization	Southeastern Federal Power Customers, Inc.
58	The EIS Scope of Work should include an explanation and justification for increasing the size of the reservoir from 6.4 MGD (see Table 2-2 of the May 2009 MNGWPD Water Supply and Water Conservation Management Plan) to 80 MGD.	4/17/2012 17:31	City	Atlanta
59	The City of Atlanta does not have significant raw water storage capacity and is primarily dependent on the Chattahoochee River as its source of drinking water. The EIS should include consideration of the potential impact(s) of the Glades Reservoir Project on the timing and duration of releases from Lake Lanier to the Chattahoochee River, and should be evaluated and developed to ensure that downstream users are not adversely impacted. This task needs to be included in the EIS Scope of Work.	4/17/2012 17:31	City	Atlanta
60	Consistent with Georgia's Interim Instream Flow Protection Strategy, the EIS should be scoped to include an evaluation of operations and impacts based on monthly 7Q10 flow and protection of downstream users as well as the "non-depletable flow" requirements of downstream users.	4/17/2012 17:31	City	Atlanta

Glades Reservoir EIS - Scoping Comments

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Approximately 52,000 acres of White County is publicly owned by the United States government and the State of Georgia.Data from the White County geographic information system shows that total watershed area for the proposed Glades Reservoir is approximately 11,300 acres, with 10,430 lying in Hall County and 870 acres located in White County (7.7% of the watershed). In the State of Georgia this qualifies as a small water supply watershed - less than 100 square miles. Attached are maps identifying the watershed boundary acreage within both Hall and White Counties, and the area for both the Inner Management Zone and Outer Management Zone in the watershed. The land use acreage for the portion of the watershed White County is identified in the table below:</p> <table border="1" data-bbox="348 685 2231 756"> <thead> <tr> <th>Land Use Type</th> <th>Total Parcels</th> <th>Total Acres</th> </tr> </thead> <tbody> <tr> <td>Agriculture</td> <td>66</td> <td>172.000</td> </tr> <tr> <td>Recreation</td> <td>1</td> <td>102.000</td> </tr> <tr> <td>Commercial</td> <td>12</td> <td>33.000</td> </tr> <tr> <td>Multi-Family</td> <td>1</td> <td>1.000</td> </tr> <tr> <td>Manufactured Home</td> <td>47</td> <td>85.000</td> </tr> <tr> <td>Public Institutional</td> <td>3</td> <td>10.000</td> </tr> <tr> <td>Single Family</td> <td>159</td> <td>467.000</td> </tr> <tr> <td>Total</td> <td>289</td> <td>870.000</td> </tr> </tbody> </table> <p>(Recreation is golf course open to the public)</p> <p>This portion of White County is also part of the service delivery area for the White County Water Authority providing public water for residential and commercial uses in the community. In addition, the White County Water Authority provides water service to a small number of customers in Hall County. Drinking water sources in White County include the Turner Creek Reservoir located in the northwestern portion of the county and from deep well systems developed by the City of Cleveland and the City of Helen. Currently, the majority of White County residences obtain their drinking water from private wells. White County has adopted water supply watershed rules that protect the drinking water for the Turner Creek Reservoir and another drinking water intake located on the Soque River in neighboring Habersham County. In addition, White County has adopted six other environmental protection ordinances managing development impacts on the quality of the environment. At the current time, Hall County has not contacted White County concerning our county's role in the project and the impact(s) that the Glade Reservoir project could have on White County. It is not clear what rules will be mandated upon White County, if any, in the protection of the water for this type of facility. However, we know that there will most likely be some type of regulations required within the watershed in order to protect the drinking water source. By virtue of the actions that White County may have to act upon, some questions and issues have surfaced to which we would like to comment on, and hope to receive some answers.</p> <p>First, White County supports Hall County's right to develop their own drinking water resources in order to address their projected growth needs. Their long term planning efforts are to be applauded. However, since a portion of the watershed is located within White County, and White County will most likely be required to protect the drinking water reservoir, will our county have a vested right and allocation to use this source to address our future growth needs as well? Secondly, in the development of this facility, White County would like to know if this will have an impact on the planning and development of our own future drinking water sources in order to address the demands of future growth in our community. It is important to note that while we anticipate a continued high rate of growth in our community much of the county is currently transitioning from the use of private wells to water services provided by public systems. Therefore the need for planning and developing additional drinking water sources for the next thirty to fifty years within our county is a high priority. We hope that the development of drinking water sources in other communities downstream, such as Hall County, will not overshadow our community's immediate and long-term needs. Finally, White County is a member of the Coosa-North Georgia Water Planning District. We are currently working with the State of Georgia and water district members in the development of a water plan that will responsibly meet the needs of our future growth. This plan will address such issues as the development of future water resources, water conservation and contingency planning, wastewater needs and water quality protection. Realizing this, White County respectfully requests the ability to reserve the right to plan and to develop its own water resources in order to meet its own future demand. We seek to be assured that adequate drinking water allocations will be considered, reserved and granted to our community, for future use, particularly as other facilities are proposed and developed further downstream in the Chattahoochee River basin and have a direct impact on the management of growth within our county. 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Glades Reservoir EIS - Scoping Comments

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Glades Reservoir EIS - Scoping Comments

PROJECT WEBSITE COMMENT SUBMISSIONS

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63	<p>The Glades project is absolutely not needed. Any reasonable person should see the folly of a scheme to place a dam within a few hundred yards of Lake Lanier and to pump water out of the Chattahoochee just before it would enter the lake and pump it to another watershed. This is all water that would have been in Lake Lanier in a matter of minutes, where withdrawal and distribution infrastructure is already in place. Since the Glades Reservoir itself would only provide a fraction of the proposed allocation, and then only during periods of low flows, the project should be more accurately renamed something like "Chattahoochee to Oconee Interbasin Transfer and Consultant Enrichment Project". The EIS should examine the population projections that the applicant relied upon to determine 2060 water needs. As reported in the March 1, 2012 Atlanta Journal-Constitution, page A-12, the Atlanta Regional Commission is revising their projections for the ten county metro area after seeing growth rates drop by two-thirds during the past three years, and they envision much flatter growth rates for the foreseeable future. The Applicant most likely relied on these or other equally faulty assumptions. Since the project's ultimate water distribution plans (which were not detailed in the proposal) are entirely dependent on use of the Cedar Creek Reservoir controlled by the City of Gainesville, and the city is not in support of the proposal, the applicant should be required to provide a detailed analysis, including costs projections, of how water will be treated and distributed. Since over 90 percent on the water allocation sought in the Applicant's proposal is dependent on the support of the City of Gainesville and Cedar Creek Reservoir, the application should be denied now rather than allowing more taxpayer dollars to be spent in review of the proposal. The history of the Glades project should be closely reviewed to understand how what started as a local government funded amenity lake for a private development, an expense justified to the public as a water supply, has developed a life of its own and grown into the present proposal. My understanding is that the County agreed on operational restrictions on water use. A "Short Form Intergovernmental Agreement" dated 12/15/2000 between Hall County and the Gainesville And Hall County Development Authority, concerning the 765 acre reservoir property, is recorded in Book 3935, Page 3-5, in the Hall County deed records. Development authorities serve as intermediaries on projects in part to shield details from the public, ie the short form filing. The EIS should require a complete public disclosure and review of any existing agreements the applicant may have made concerning Glades Reservoir, including the full intergovernmental agreement referenced above. Did the applicant's subsequent purchase of the lake site negate those agreements? Are there other side agreements that should be disclosed and considered in the EIS? The "meeting highlights" from the recent January 26, 2012 Hall County Board of Commissioners meeting states the following in a list of consent agenda items: "Extension Letter of Intent between Hall County and Glade Farm, LLC to allow for further negotiation and development of information needed to address items originally agreed upon." Apparently other agreements do exist and should be revealed in full. How will they impact the project?</p>	4/17/2012 20:10	Property Owner	citizen and tax payer
64	<p>If not immediately declined for other reasons, the Applicant should be required to update and revise the proposal in light of the the Magnuson ruling being overturned. The goal of our elected officials should be working to obtain authorizations for water withdrawals from Lake Lanier based on real needs. Additional allocations from Lake Lanier was not presented as an alternative, presumably since US congressional action would be required. This is the most sensible, cost effective, and environmentally sound alternative (after conservation). A plan to make it happen should be detailed in the proposal. The two reservoir alternatives presented would also have faced hurdles. Could this Lanier omission be because consultants and engineers make money building reservoirs, not watch a lake level rise. Considering the much smaller initial proposal for 6.2mgd from Glades Reservoir to meet 2060 needs for portions of Hall County, also likely based of flawed assumptions, an increased effort should be placed on conservation to meet water needs, and a decreased effort on promoting subsidized population growth. We need to focus on sustainable economic growth strategies that do not require population growth. The applicant's misguided zeal to be in the water business promoting growth in other counties will put Hall County residents at great risk financially. One only needs to look at the cost overruns and other problems with other reservoir projects around the state, often developed by the same consultant involved in the Glades project. Often projects like this are allowed to proceed and then the mitigation of the environmental damage is neglected. The proposal should include a more complete plan for mitigation, including a detailed listing of suitable banked mitigation projects that are available. There should be oversight and follow-up to ascertain that the mitigation goals are achieved, and there should be full disclosure to the public as to who benefits financially from the mitigation arrangements. The applicant should offer construction details on the proposed pipe line crossing the Chattahoochee River at the pump station. The project will have lasting negative impacts on a river that was recently recognized by the US Dept of Interior as the first National Water Trail in the country. Recreation on the river, with the economic boost it brings, is increasingly important. Three new state parks on the headwaters section, including Don Carter on Lanier near the Glades Reservoir, are listed among the access points for the new Upper Chattahoochee Blueway trail. The last thing people enjoying the river want to see and hear is an unnecessary pump station and large pipe crossing the river, not to mention having to deal with the low flows the operation would bring.</p>	4/17/2012 20:10	Property Owner	citizen and tax payer

Glades Reservoir EIS - Scoping Comments

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65	<p>Finally, because I believe one cannot overstate the role of the revolving door government officials and other consultants that are promoting these water schemes to the state local governments, I would like for the record to include the following complete text of the following AJC newspaper column on the subject. My hope is that the various government agencies that review the project will not be unduly swayed by the influence of these consultants or the many political pressures that will be applied.</p> <p>-----</p> <p>Consultant's power raises questions By Chris Joyner The Atlanta Journal-Constitution 3:06 p.m. Saturday, June 4, 2011</p> <p>The state of Georgia is preparing to invest \$300 million during the next four years to jump-start new reservoir development, a complicated, expensive and debatable method to address the metro area's long-term water needs.</p> <p>At the center of most of these projects is one man - a lawyer in Covington who commands top dollar from local governments as their reservoir consultant. William Thomas "Tommy" Craig has assembled a cadre of experts-for-hire to lock up most of the consulting business and collects millions of dollars from county commissions and city councils by hacking through the thicket of federal and state regulations that stand between them and the prize - a reservoir that may be the most expensive investment these governments have ever made.</p> <p>"I've got different people for different endangered species," Craig said of his team. "I've got people who do cultural resources. I've got people that do wetlands and streams. I've got people that do the engineering. This is a highly specific kind of thing. It's a small universe of people who can do this work well."</p> <p>Some believe that consultants wield too much influence over the management of Georgia's water resources, pushing local officials toward more expensive and environmentally damaging reservoirs rather than making full use of existing water sources.</p> <p>"There are consultants who, in essence, say to their clients, 'Look, I don't think we have to follow these rules. I will lobby, cajole, arm-twist, whatever,'" said Sandy Tucker, state field supervisor for the U.S. Fish and Wildlife Service, one of several government regulators who has a hand in deciding whether to permit reservoir projects in the state.</p> <p>That approach ends up costing more time and money for local governments, she said.</p> <p>Three small cities in south Fulton County have paid Craig \$1.5 million since 2005 to help them create the Bear Creek Reservoir, and they continue to pay him an average of more than \$25,000 per month, records show. He also is on retainer of \$22,500 a month with Hall County to help bring about the massive Glades reservoir project there. Cities and counties turn to him, Craig said, because he gets results. "I have, in my career, taken over 10 water supply projects at the request of local governments who had other consultants and had spent millions of dollars and achieved no results," he said. One of those is Bear Creek in south Fulton. Fairburn, Palmetto and Union City combined have about 34,000 people to share the estimated \$100 million cost of the reservoir. To finance Bear Creek, the South Fulton Water and Sewer Authority issued \$42 million in bonds in 2003, and local taxpayers will pay \$2.2 million on the debt this year. Typical of such projects, the Bear Creek Reservoir is still years away from producing its first drop of water and more debt will be incurred before it is done. John Miller, mayor of Palmetto and chairman of the South Fulton Water and Sewer Authority, said Craig and his team have been worth the expense. "Tommy Craig's group, if you are building this type of reservoir, is critical," he said. "This project spun its wheels for a couple of years because [the authority] didn't have the unique expertise to make to happen." Building a team Craig's services often come as part of a package with those of Joe Tanner & Associates, a firm that brings political heft and an insider's knowledge of the regulatory system to projects. Tanner is a former commissioner of the state Department of Natural Resources whose team includes Harold Reheis, former head of the state Environmental Protection Division. The firm contributed \$350,000 to dozens of political campaigns since 2003, most of them for state and legislative races, according to records reviewed by The Atlanta Journal-Constitution. For example, Tanner's firm contributed \$12,825 to the campaign of Gov. Nathan Deal last year; the governor-elect named Tanner to his transition team. Tanner said he and his associates mostly contribute their knowledge and expertise from decades of government service, an approach that has made them very much in demand. "There is nothing wrong with carving out a niche for ourselves in business," Reheis said in a phone interview with the AJC last week. "That's part of the American system. It doesn't mean there is anything wrong with the system." Environmentalists often oppose reservoir construction, saying there are cheaper, less intrusive ways to provide water. Many are critical of Craig, Tanner and their work precisely because they hold the reins of so many projects in development.</p> <p>"This team not only has a near monopoly on the business, they seem to have a lock on the facts and information on Georgia's water crisis," said Sally Bethea, executive director of the Upper Chattahoochee Riverkeeper. "They put this information forward as the gospel, and they are believed by elected officials and everybody else." Craig portrays the criticism of his environmental foes as a "casual and irresponsible" approach to the complicated problem of watering a growing</p>	4/17/2012 20:10	Property Owner	citizen and tax payer

Glades Reservoir EIS - Scoping Comments

PROJECT WEBSITE COMMENT SUBMISSIONS

Online Comment #	Comment	Date/Time Received	Affiliation Type	Affiliation Name
	<p>region."The environmental community thinks that conservation is the total answer to the water supply answer," he said. "It is not the ultimate answer. I'd be glad to debate that publicly."On regional water boardLt. Gov. Casey Cagle named Craig to the board of the Metropolitan North Georgia Water Planning District in 2007, and Craig served on Cagle's re-election steering committee for the 2010 campaign. Ben Fry, Cagle's spokesman, called Craig an obvious choice for the board."Tommy Craig is one of the leading experts in the state when it comes to water policy,"Fry said.He said Craig has shown "impeccable integrity" in abstaining from votes directly affecting his own projects.In its water supply management plan, the Metropolitan North Georgia water district voiced support for six reservoir projects, which it says are "of critical importance" to the region. Craig is a consultant on three of them, but he said he has never used his position on the board to influence policy.Craig said he is on the board to "help them avoid mistakes and pitfalls," but some worry that Craig's involvement with so many water projects make him a poor fit on the board."That's troublesome to me," said Rep. Debbie Buckner, a Democrat from the Columbus area. "He could influence policy to meet the needs of his customers."Jenny Hoffner, director of water supply for the conservation group American Rivers, said Craig's role with the water policy board is a byproduct of a system that favors expensive and time-consuming reservoirs over other efforts."There is a very strong voice for reservoirs in our state," Hoffner said. "There clearly is a constituency in this state that stands to benefit from the building - or just the planning of - these reservoirs. The planning can take, in the best case scenarios, eight years."\$300 million investmentEarlier this year, Deal pledged \$300 million in state money during the next four years to promote work on new reservoirs to give the state enough water to meet projected growth for decades to come.With the governor signaling his desire to get new reservoir projects moving, environmentalists fear the influence of these top consultants will continue to grow.</p> <p>"I don't think it's illegal," said Bethea of the Upper Chattahoochee Riverkeeper. "It's just the state or somebody who is the parent here should not be allowing these things."Craig counters that the process is governed by population growth. Local governments need to be able to provide water for current and future residents and businesses, while areas that do not grow will not need them."That's the safeguard you have got from the environmental standpoint," he said. "If you don't have ratepayers, present and future, lined up, then these projects are unaffordable no matter how much state assistance you get."It decreased our leverage'In 2009, officials in Hall County decided to greatly expand the planned Glades reservoir and sell the excess water to neighboring counties."In hindsight, I can't say that it was the best idea, especially if we don't have the funding to get it done," said Commissioner Ashley Bell, who was not on the commission at the time the decision was made.Bell, a critic of the cost of the \$350 million reservoir project, believes Glades is needed to ensure Hall County's future. But he is worried both about the scope of the project and about the millions in fees the county has paid to consultants who never competed to get their contracts.The contractors include Craig, Tanner and national engineering firm AECOM.To expand the project, Hall County paid \$4 million to buy out the family that owned the reservoir land, much of which reimbursed the family for what it already had paid Craig and his team. Since then, another \$1.8 million has gone to the consultants, and the project is years away from a drinkable drop of water.In January, Bell invited representatives from a law firm that competes with Craig for reservoir business to speak to the commission."I understand that Tommy Craig has had a lock on reservoirs in this state," Bell said. "I wasn't comfortable with the fact of dealing with someone who considered himself the only option. It decreased our leverage with him."After the presentation by the competing firm, Craig warned the commission that firing him would be a "terrible mistake." It would not only cost the county his services but those of Tanner, Reheis and the other firms as well. He did agree to a 10 percent cut to his \$25,000-per-month fee.But Bell said the episode underscores a problem facing local governments going forward."When you have a small group of people who are the only ones to go to in this area, it puts small governments at a disadvantage," he said. "He says, 'If I go, they go. If you fire me, nobody is staying.' It puts us at a disadvantage."Find this article at:http://www.ajc.com/news/georgia-politics-elections/consultants-power-raises-questions-967216.html</p> <p>Thank you for considering my comments.</p>			
66	<p>Water is the life blood of quality of life issues and necessary for economic growth (jobs). Without water all the rest are unnecessary. The Glades project ensures water for the people of several counties in northeast Georgia. this project is needed, it is logical and affordable. This is a must do project for the future. Request approval.</p>	4/17/2012 22:05		