

State Agency Scoping Coordination Meeting
Glades Reservoir EIS
US Army Corps of Engineers, Savannah District
Permit Application SAS-2007-00388
Meeting Summary

Meeting Date	March 21, 2012
Time	10am (CST)
Subject	Alabama State Agency Scoping Coordination Meeting
Location	Alabama Department of Economic and Community Affairs, Conference Room A
Attendees	See list below

Meeting Summary

1) Welcome and Introductions

Katie Freas (USACE) welcomed all to the meeting and introduced herself as the assistant project manager for the Glades Reservoir Environmental Impact Statement (EIS). She introduced Richard Morgan, the USACE project manager for the EIS, and David Crosby, the Assistant Division Chief for the Regulatory Division of the Savannah District Office, as well as Melanie Casner and Tracy Robillard of the USACE. Ms. Freas introduced AECOM's project manager, Tai Yi Su. Mrs. Su introduced the EIS project team members and briefly discussed their role as the third-party contractor in the EIS process. Ms. Freas asked the representatives from Alabama's state agencies and the EPA representative to introduce themselves.

2) NEPA Overview

Ms. Freas gave an overview of the EIS process. The Alabama state agency representatives asked about the applicability of recent NEPA guidance on the current EIS process. Representatives from the USACE and EPA responded that the new guidance is not expected to result in any major changes to the EIS process, as much of the guidance is already being implemented. Ms. Freas stated that the goal of this scoping meeting is to discuss agency concerns and areas of focus for the EIS. The Alabama agency representatives noted that cumulative impacts will be their primary concern in the process.

3) Overview of Proposed Reservoir and Water Supply Project

Mrs. Su gave an overview of the proposed project, including project elements (reservoir, pump stations, and pipelines), purpose and need, and the proposed operational plan. She stated that the pre-meeting materials sent to the agency representatives included the display boards and fact sheets that were used (and to be used) in the public scoping meetings. She explained that the

scoping display materials were developed based on information submitted by the applicant. The USACE and AECOM will be verifying the data and assumptions submitted by the applicant.

4) Open Discussion

Modeling and Downstream Impact Evaluation

Question (Q) (AL): Has USACE verified the information in the applicant's application?

Answer (A)(USACE): USACE is reviewing the July 2011 application from Hall County, including the ResSim model used to evaluate the downstream impacts. USACE (Savannah District) has only recently received the latest version (May 2011) of the ResSim model from the Mobile District for this EIS and is still awaiting the model used by the Applicant. The Applicant's ResSim model is based on an older 2008 version. The data, modeling assumptions, and estimate of impacts have not yet been verified. AECOM will be verifying the Applicant's modeling assumptions and results.

Q (AL): What minimum instream flows (MIFs) will be used to evaluate the project?

A (AECOM): The MIFs proposed by the Applicant were based on a site-specific study conducted by the Applicant, and they are based on estimated annual 7Q10 flows for both Flat Creek below the dam and for the Chattahoochee River at the withdrawal location.

Comment (USACE): The Georgia EPD has not approved the proposed MIF in the Chattahoochee River below the withdrawal location. Georgia EPD's current guidance is based on the 2001 Interim Instream Flow Policy, and EPD has not yet determined whether the annual 7Q10 flows are most appropriate for this project.

(C) (AL): The Alabama agencies would prefer an evaluation based on monthly 7Q10 flows instead of annual 7Q10 flows.

Q (AL): Does USACE have the spreadsheet model that was developed for the project? The Alabama Department of Economic and Community Affairs does not have it.

A (AECOM): AECOM stated that they have the spreadsheet model for the reservoir yield analysis.

The Alabama representatives noted that they recently received the most current version (May 2011) of the ResSim model. AECOM commented that they believe this is the same version that USACE, AECOM and Georgia EPD have as well, but the modeling analysis submitted by the Applicant was based on a previous version.

Q (AL): What modeling information will be disclosed to other agencies?

A (USACE): Modeling information will not be disclosed while it is in draft form. The USACE plans on releasing modeling results to outside parties when the results have been reviewed and finalized and the Corps finds the model to be acceptable and representative of the Applicant's proposed project.

C (AL): The Alabama agencies will request review copies of the models.

C (USACE): The USACE requests that the Alabama agencies review, and hopefully concur with the input data sets and assumptions that are used in the May 2011 ResSim model. The USACE noted that the modeling analyses may be based on both actual/recent withdrawals and on permitted/projected data.

C (AECOM): The different data sources may be appropriate for different types of impact evaluations for the EIS alternatives. Actual data would be used to establish a baseline for existing conditions, and may also be used to evaluate impacts. Permitted withdrawals or projected data (e.g. future demands, wastewater returns) may be used to evaluate cumulative effects. The model would need to be able to handle a range of different conditions.

Water Withdrawal and Permitting

C (USACE): It is possible for USACE to permit a proposed project that supports a greater amount for withdrawal than the state (Georgia) would permit. The lowest permitted amount by either the state or USACE is all that can be withdrawn. For this project, the permit applications for withdrawing water from the Chattahoochee River and from the proposed Glades Reservoir are currently being evaluated by the Georgia EPD.

C (AL): The Alabama agencies are concerned that the scope of the project has greatly expanded from Hall County's original application which proposed a reservoir yield of 6.4 million gallons per day (mgd) to now proposing a system yield of 80 mgd. ."

Q (AL): What criteria would USACE use in deciding whether to issue a permit? Would USACE be permitting water withdrawal?

A (USACE): The 404 permit, if issued by the USACE, would allow for construction of the intake and the reservoir structures, and associated filling and dredging activities, but not for the water withdrawal itself. The EIS will evaluate the impacts of water withdrawals on the Apalachicola-Chattahoochee-Flint (ACF) River system. Georgia EPD evaluates water withdrawal permit applications. The USACE will evaluate the impacts of the proposed project on the segment of the Chattahoochee River below the proposed pump station site to Lake Lanier (approximately 7 miles) and its effects on Lake Lanier.

Operations of Lake Lanier and Downstream Reservoirs

Q (AL): How will the 11th Circuit Court directive (regarding the USACE Mobile District authority on water supply storage allocation in Lake Lanier) affect this EIS process?

A (USACE): The USACE is required by the 11th Circuit Court to determine the extent of their authority to allocate water supply storage in Lake Lanier; the Mobile District report is expected this summer. At this time, it is unclear how the outcome of the report would affect the EIS project scope and timeline. Currently the Draft EIS is proposed to be available for comment in December 2012.

AECOM noted that the USACE will be finalizing the scope of the EIS in the next few months, followed by alternatives development. The scope and alternatives for the EIS may have to be revisited based on the Mobile District report.

Q (AL): Will the USACE be evaluating how the proposed project would impact the available water storage in Lake Lanier and the operation of Lake Lanier?

A (USACE): The USACE Mobile District will assess how the proposed project may affect Lake Lanier's operation and how the project may affect other USACE projects downstream. The application states that 70-80 percent of the water withdrawn at the Chattahoochee River would be returned to Lake Lanier. USACE has yet to verify alternative return flow scenarios.

Interbasin Transfer

Q (AL): How about the potential issues related to interbasin transfers from the ACF Basin to the Oconee River Basin? Cedar Creek Reservoir is in the Oconee River Basin.

A (USACE): The USACE will evaluate the effects of interbasin transfer, but does not regulate such transfers. The State of Georgia regulates interbasin transfers.

Purpose and Need

Q (AL): Has the USACE validated the applicant's purpose and need?

A (USACE): The USACE has not yet verified the need for the project.

NEPA Process

Q (AL): Is this the first project that would fall under the EPA's new guidance (*Region IV Guidelines for Water Efficiency Measures for Water Supply Projects in the Southeast, June 2010*)?

A (EPA): EPA is not sure if this is the first project or not. EPA has a team of 7 people that will evaluate effects on wetlands, water quality and other impacts in regard to guidance and regulation. The guidelines would be discussed, but are not formal requirements.

C (AL): We would like to know if the guidelines have been used on other water supply projects, and we will coordinate with EPA for more information.

C (EPA): EPA summarized their role as a cooperating agency for the project. As a cooperating agency, EPA will provide technical assistance within their regulatory authority. EPA will continue to collaborate and be involved in the project.

Q (AL): Who are the other cooperating agencies?

A (USACE): Georgia EPD is the only other cooperating agency for this project. US Fish and Wildlife Service (USFWS) was also invited but declined.

Q (AL): Will there be consultation with USFWS? Will the cooperating agency letters be made public?

A (USACE): USFWS has declined the invitation to participate as a cooperating agency, but Section 7 consultation with USFWS will still occur (per the Endangered Species Act of 1973, 50 CFR § 402.01(a))

§ 7). USACE plans on posting on the project website the letters of agreement from EPA and the Georgia EPD, as well as the letter from USFWS declining participation as a cooperating agency.

Return Flows and Downstream Effects

Q (AL): How will the effect of return flows be evaluated, including net effects related to withdrawals and returns? Is there a potential for credits toward returns in exchange for withdrawals?

A (USACE): USACE will evaluate the effects of return flows to the extent possible, in addition to the effects of evaporative loss and other potential impacts.

C (AL): Alabama will request that the USACE evaluate the effects of withdrawals without any wastewater returns (as a worst case scenario) because the current available information on wastewater return is incomplete.

C (AL): Some of the predicted impacts on downstream lakes/reservoirs stated in the application may be understated and the Alabama agencies request that USACE verify the applicant's findings. Alabama would like to know how the withdrawal on the Chattahoochee River would affect inflows into Lake Lanier and hydropower generation on downstream reservoirs.

Q (USACE): USACE asked about any known foreseeable projects including projects and additional water uses in downstream states that might result in cumulative effects.

A (AL): Alabama will review and determine if there are any potentially foreseeable water projects.

Q (USACE): Are you concerned about the effects on aquifers and agriculture in Alabama?

A (AL): Agricultural withdrawals are not as much an issue for Alabama, as most of the agricultural water needs are tied to the Flint River rather than the Chattahoochee.

Q (USACE): USACE asked if Alabama is concerned about any effects on recreation?

A (AL): Alabama is concerned about the effects of the proposed project on water quality in the Columbus stretch of the Chattahoochee River near Phenix City.

C (AECOM): The key would be to first identify the proposed project's impacts on streamflows and lake levels (quantities), and then to evaluate the potential effects on water quality. Water quality parameters of interests could include dissolved oxygen, temperature and nutrients.

Q (USACE): Does Alabama have stream classifications for the Chattahoochee River at the state line?

A (AL): There are stream classifications and water quality standards for the Chattahoochee River.

Magnitude of Water Withdrawal

Q (AL): What would be considered periods of "high flow"? When would withdrawals occur? It appeared the annual average withdrawal from the Chattahoochee River is about 66 mgd based on information provided in the application.

A (USACE): Operationally, water withdrawal could occur from the Chattahoochee every day, but the quantity of water pumped from the proposed Glades Reservoir to the Chattahoochee River would be adjusted based on the quantity of streamflow available in the river above the withdrawal point and the quantity of minimum instream flow required below the withdrawal point. The Applicant's modeling simulation showed that withdrawal from the Chattahoochee River to Cedar Creek Reservoir could occur at all times (when demands reach 80 mgd in the long term) subject to restrictions imposed by required minimum flow levels. AECOM confirmed that the average withdrawal would be 66 mgd based on information supplied by the Applicant.

C (AL): Alabama is concerned about the magnitude of the water withdrawal. The drainage area at the proposed pump station on the Chattahoochee River is one-third of Lake Lanier's drainage area. It appears that the effects of the proposed project on Lake Lanier have been understated in the application. Alabama would like to understand how the proposed project would diminish the percentage of inflow into Lake Lanier.

Fisheries

Q (USACE): Are there any species of concern for the state agencies?

A (AL): There is only one federally-listed aquatic species in the area under Alabama jurisdiction (purple bankclimber), but there are also concerns about sport fisheries on portions of the Chattahoochee River. Alabama would like to know how lake level fluctuations and manipulation would affect downstream sport fisheries.

River and Lake Management

Q (AL): Will the EIS formally evaluate impacts to the Revised Interim Operating Plan (RIOP) from the Mobile District? Will the EIS have a specific section on impacts to the RIOP?

A (USACE): USACE Savannah District would coordinate with Mobile District with regard to the potential hydrologic effects for the proposed project on the RIOP. AECOM stated that the hydrologic effects section of the EIS would explain how the hydrological assessments were performed, what operational conditions were used in the model, and other considerations. The EIS would disclose different river management scenarios, if modeled.

Water Sale

Q (AL): What is the potential of Hall County selling water from the project (rather than exclusively serving Hall County users) and how will it affect USACE's evaluation?

A (USACE): The USACE has required service agreements on previous projects, but whether that would be included in the evaluation of this proposed project has not yet been determined. The USACE's review of the project's needs will be based on population and demands within Hall County's service area only. AECOM noted that there is an overall per capita water demand rate that is stated in the application and the stated per capita number does not show a breakdown for different water uses (in other words, water sales to others beyond Hall County, if any, have not been identified).

Drought Analysis

C (AL): Alabama requests that the USACE review the critical drought period used for the hydrologic modeling. The Applicant used the 1998 - 2003 drought period as the critical drought period in the ResSim modeling of downstream impacts. However, the 1985 - 1989 and 2007 - 2009 droughts should also be considered and the 2007 - 2009 drought may have had greater impacts and should be evaluated.

A (AECOM): The importance of the 2007-2009 drought is well understood by the EIS team and AECOM will review the historical drought records to determine the most appropriate "critical drought period" for this EIS evaluation.

Alternatives

C (AL): Alabama would like consideration of conservation, reuse, no-action and avoidance alternatives in the EIS, as well as expanding existing storage capacity from Lake Lanier as an alternative.

C (AL): Alabama is concerned that the minimum flow will become a "ceiling" for withdrawal.

EIS Process

Q (AL): Would Alabama be included in the modeling analysis with USACE and Georgia EPD?

A (USACE): The USACE is trying to be as transparent as possible throughout the EIS process, including sharing the modeling information with the state agencies at the appropriate time. However, draft and interim work products will not be released to the state agencies. The exception to this is that the cooperating agencies (i.e. Georgia EPD and EPA) will have access to pre-decisional information that is not accessible to other agencies. The USACE requested an AL modeling point of contact for the proposed project.

C (AL): Brian Atkins will be the Alabama point of contact for modeling for the proposed project.

Q (AL): Will USACE have another state agency meeting during the Draft EIS comment period?

A (USACE): The USACE may conduct an additional agency meeting or ask the agencies additional questions as part of the Draft EIS comment period.

C (AL): The opportunity to comment would be welcomed.

Q (AL): Will any decisions by Georgia EPD or other agencies to certify the project be made publicly available?

A (USACE): Such certifications or decisions are not likely available until after the EIS has been completed. As a cooperating agency, Georgia EPD will be involved in project discussions throughout the EIS process. USACE aims to be as transparent as possible. USACE has not yet determined what will go on the website or be made publicly available throughout the process.

C (AL): Alabama is strongly opposed to the proposed project based on the information provided by the Applicant and USACE.

Q (AL): What is the best way for the Alabama state agencies to provide comments?

A (USACE): A formal letter would be best, but USACE will accept multiple or last minute comments up to April 17, 2012 via any method provided (online submittal).

The meeting was adjourned at 11:45 am (CST).

Meeting Attendees

Staff in Attendance

Richard Morgan (USACE)

Katie Freas (USACE)

David Crosby (USACE)

Tracy Robillard (USACE)

Melanie Casner (USACE)

Tai Yi Su (AECOM)

Anne Minihan (AECOM)

Blaine Dwyer (AECOM)

Pamela Burnett (AECOM)

Robert Esenwein (AECOM)

Rebecca Brofft (AECOM)

Brian Rochester (Rochester & Associates – AECOM subcontractor)

Cooperating Agency in Attendance

Jamie Higgins (EPA)

State Agencies in Attendance

Brian Atkins (Alabama Department of Economic and Community Affairs – Office of Water Resources)

Tom Littlepage (Alabama Department of Economic and Community Affairs – Office of Water Resources)

Dow Johnston (Alabama Department of Economic and Community Affairs – Office of Water Resources)

Lynn Sisk (Alabama Department of Environmental Management –Water Quality Branch)

Nick Nichols (Alabama Department of Conservation and Natural Resources)