

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 20, 2012
Time	9:00 am
Subject	Georgia State Agency Scoping Coordination Meeting
Location	Georgia DNR Board Room, Atlanta, Georgia
Attendees	See list below

Meeting Summary

1) Welcome and Introductions

Richard Morgan (USACE) welcomed all to the meeting and introduced himself as the Project Manager for the Glades Reservoir Environmental Impact Statement (EIS). He introduced David Crosby as the Assistant Division Chief for the Regulatory Division of the Savannah District Office, as well as Melanie Casner and Tracy Robillard of the USACE. Mr. Morgan asked the representatives from USACE, AECOM and agencies to introduce themselves. Tai Yi Su, project manager for AECOM, introduced the AECOM project team and discussed the role of the third-party contractor in the EIS process. While Hall County is providing the funding for the EIS, AECOM reports strictly to the USACE, not the applicant. She noted that this is the first reservoir project in Georgia that has been required to go through an EIS process. The representatives from the Environmental Protection Agency (EPA), Georgia Environmental Protection Division (EPD), Department of Natural Resources Wildlife Resources Division (WRD) and Georgia Environmental Finance Authority (GEFA) introduced themselves.

2) Overview of Proposed Reservoir and Water Supply Project

Tai Yi Su gave an overview of the proposed project, including project elements (reservoir, pump station, and pipelines), purpose and need, and proposed operational plan. She stated that the meeting materials (display boards to be used in the public scoping meetings) were developed based on information submitted by the applicant; the USACE and AECOM plan on verifying the data and assumptions submitted by the applicant.

3) EIS Process and Purpose of Scoping

Richard Morgan provided an overview of the EIS process and the purpose of Scoping.

4) Open Discussion

Question (Q) (EPD): What will the general schedule be for the EIS?

Answer (A) (USACE): Currently, the draft EIS is scheduled to be prepared by late 2012, with an opportunity for the public to comment on the draft EIS after it is published. The USACE is anticipating approximately one year after the draft EIS to complete the final EIS; however, until the scoping process is complete, the project timeline cannot be precisely defined.

Q (EPA): Do you plan to address the issues from the draft EIS in the final EIS (rather than a final draft EIS)?

A (USACE): Generally, the process goes straight from the draft EIS to the final EIS. Once public comments are solicited for the draft EIS, they are addressed directly in the final EIS. If there are significant changes to the proposed project between the draft and final EIS, the EIS process might have to start again. The USACE will hold a public hearing within 30 to 60 days after the draft EIS is published. After addressing the public comments, a final EIS will be issued for a public review period of 45 days, and then a Record of Decision (ROD) will be issued.

Q (EPD): Which document is "actionable" for the State's issuance of the Section 401 Water Quality Certification?

A (USACE): The State should make their water quality certification (401 certification) based on the final EIS. The ROD cannot be signed by the USACE's District Engineer until the 401 certification is issued.

Q (EPD): Where does the public notification of the Section 401 Water Quality Certification fit in the process?

A (USACE): The USACE will issue a Public Notice for the permit application concurrent with a Notice of Availability for the draft EIS.

Q (EPD): Do the project impacts (acres of wetlands and linear feet of streams) include impacts from pipelines and pump stations?

A (AECOM): The affected wetlands numbers shown in the application are estimates from the Applicant that include impacts along the proposed pipelines and at the pump station sites. The USACE plans on verifying the estimates provided by the Applicant.

Comment (C) (USACE): To date, we are not aware of any State and Federal listed species that this proposed project would affect. The USACE has not started consultation (with the Federal agencies) regarding the proposed project's downstream impacts on fish and wildlife (including mussels in the Apalachicola River) in the Apalachicola-Chattahoochee-Flint Basin.

C (USACE): There is a cultural resources survey provided by the Applicant. If the agencies are aware of any specific historical or cultural resources on the proposed sites and alignments, please let the USACE know.

C (USACE): The EPD is planning on meeting with the Applicant to discuss the associated water withdrawal permit applications for the proposed project. The draft EIS needs to include adequate information that would help the State make their decisions on the water withdrawal permit applications, the Section 401 Water Quality Certification, the stream buffer variances, etc.

Modeling and Downstream Impact Evaluation

Q (USACE): The USACE had a previous project that had an issue with using the 7Q10 as the minimum instream flow value. Is there an Georgia EPD Interim Instream Flow policy or is 7Q10 the policy?

A (EPD): The EPD provided a summary of the current Interim Instream Flow Policy and explained the three options stated in the current policy: 1) Monthly 7Q10 minimum flow, 2) Site-specific instream flow study, 3) Annual average flow option (based on 30 percent mean annual average flow). The Interim Instream Flow Policy was adopted in 2001 in recognition of the importance of seasonal flow variations for aquatic habitats.

Q (USACE): What minimum instream flow requirements will be considered when the EPD discusses the water withdrawal permits with the Applicant?

A (EPD): The minimum instream flow requirement in Flat Creek is not a major concern. The EPD will focus on the minimum instream flow requirement in the Chattahoochee River. The minimum instream flows in the North Oconee River and in Cedar Creek (below the existing dam) will also be considered since the Cedar Creek Reservoir will be a key component in the overall operation of the proposed project.

C (EPD): Along the Chattahoochee River, there is approximately 7 or 8 stream miles from the proposed pump station to the very northern boundary of Lake Lanier.

C (AECOM): Please let the EIS team know what additional instream flow options EPD would consider in addition to the annual 7Q10 flow proposed by the Applicant. Many assumptions for the proposed project are based on the proposed annual 7Q10 flow as the minimum instream flow. This will affect the calculation of reservoir yield, evaluation of downstream impacts, and consideration of operational scenarios. We will need to look at varying operating criteria, to look at varying levels of impact.

Q (EPD): Has there been any analysis of the Applicant's preferred alternative?

A (USACE): We are verifying all data provided. The Applicant has provided a set of spreadsheets for yield analysis for the reservoir alternatives; the USACE (Savannah District) is in coordination with the Mobile District, and the EIS team has received the most recent version of the ResSim model (released in May 2011) from the USACE Mobile District. The ResSim model is used for assessing downstream effects. The EIS team is in the process of obtaining the Applicant's model (based on an older 2008 ResSim model) to compare and understand the differences in assumptions.

C (AECOM): Based on our initial assessment using the May 2011 ResSim model provided by the USACE, it has improved functionality and provides better predictions of the impacts.

A (EPD): We have been running models and various scenarios in-house. We would like to compare notes, exchange information, and use the most updated model to verify the results shown in the Applicant's model.

Q (AECOM): What is the version of the ResSim model EPD currently uses?

A (EPD): EPD uses a baseline model that was obtained from the USACE around May 2011 during a ResSim workshop conducted by the USACE in Mobile, Alabama. For the impact analysis, the EPD input the flow differences shown in the Schnabel spreadsheet from the application (differences between the no development and development scenarios) as part of the inflows to Lanier and evaluated the downstream impacts. Based on these assumptions, EPD is seeing larger impacts than what was predicted in the Applicant's model.

C (AECOM): AECOM also has observed some differences in predicted flows using the USACE's latest model. AECOM has requested a copy of the Applicant's model so that the modeling assumptions can be reviewed and understood. It would be good if the EIS team and the EPD can agree on the data sets, as well as the version of the model used for evaluating downstream impacts.

C (USACE): We would like to be as transparent as possible throughout the process, which is why the EPD was asked to be a cooperating agency for this EIS.

C (EPD): The pumping rates mentioned in the 404 permit application seem different from the numbers applied for in the water withdrawal permit application. The EPD asked the EIS team to confirm the pumping rates. EPD also asked the EIS team to be mindful of differences in terms (annual average, monthly average and maximum day) used to express water demands and pumping rates.

Q (USACE): Would EPD have any concern with the USACE posting the water withdrawal permit application documents on the proposed Glades Reservoir EIS project website?

A (EPD): We are ok with posting the Application on the website.

Q (EPD): Will the Applicant pursue the same configuration of the project regardless of the USACE, Mobile District's determination in July 2012 on water supply storage allocation of Lake Lanier? If the Applicant does change the proposed project significantly, how will this be handled in the EIS process?

A (USACE): The Mobile District's report on Lake Lanier water allocation may dictate some events in the project. If the USACE, Mobile District, determines that the Georgia communities should receive a larger portion of the water, then that could be addressed as an alternative in the EIS document. If the proposed project plan is modified significantly because of the water allocation report, the scoping process of the EIS may need to be revised. The Applicant is aware of the upcoming Mobile District report and its potential impacts on the project.

C (EPD): There is a potential that water stored in the proposed Glades Reservoir would have different temperatures than the streamflow in the Chattahoochee River. If the Applicant is discharging as much as 85 mgd of water pumped from the reservoir into the Chattahoochee River, the potential impacts of temperature in the River may need to be evaluated.

Water Quality

Q (USACE): In a previous project, a water quality issue came up with *chlorophyll a* and nutrient levels. Until Hall County starts using the reservoir, there could be water quality issues with water stored in the reservoir. Is there any concern about the water quality of the flow passing through the reservoir or spillway discharge that will be flowing into Lake Lanier? There may be a (nutrient loading) water quality issue for the water pumped from the reservoir to the Chattahoochee River. Will it potentially require a Section 402 (National Pollutant Discharge Elimination System) permit, or have fisheries/aquatic system impacts?

A (EPD): That is something the EIS team would want to evaluate.

Q (USACE): What parts of the Section 401 Water Quality Certification review does USACE need to know about (dissolved oxygen, temperature, nutrient loading, etc.)? What kind of water quality parameters will need to be evaluated?

A (EPD): There are existing nutrient standards in Lake Lanier (and in West Point Lake). Potentially Liz Booth's group (EPD's Watershed Planning and Monitoring Program) can be involved with modeling and can take a look at impacts on water quality. The USACE should look at the implications of water quality standards in all water bodies involved including the new reservoir, proposed operational scenarios, hydrologic modeling, and assess how it ties into water quality standards.

C (EPA): EPA would be interested in hydrology information and would like to be in the loop regarding sharing of modeling information. All this would need to be included in the cumulative impacts analysis.

Buried Lines, Hazardous Waste Sites, Road Closures

C (USACE): We encourage all agency representatives to disclose or provide information that would facilitate the EIS process, such as information on buried lines or old hazardous waste sites, etc. This information would be helpful at the front end of the EIS process. There is one anticipated road closure that would result from the proposed project (Glades Farm Road).

Timber Harvesting/Stream Buffers and Intended Use

Q (USACE): Are there any specific comments on the construction sequencing and methods to protect the environment if the project were to be permitted and construction began? Will there be issues with timber harvesting prior to impoundment, any concerns on sediment control and stream buffer requirement?

C (EPD): The EPD cited a previous project completed under a timbering contract; the site was cleared before construction on the dam was started. The State prefers to leave a buffer along the stream until

the reservoir construction is complete, but it is difficult to find a company to harvest the timber buffer because there is often not enough to make it commercially viable.

C (USACE): It is our understanding that the Owner of the Glades Farm retained timber rights when Hall County purchased the property. The Owner expects to harvest the timber prior to project construction, as timbering is Glades Farm's business.

A (EPD): It is a good idea to develop a construction sequencing plan related to timber harvesting and dam construction.

C (USACE): Since timbering could have an effect on reservoir water quality, the issue needs to be discussed and addressed in the EIS.

A (EPD): EPD suggested the EIS team consult with the cooperating agencies for guidance on the timbering aspects of the project to minimize adverse impacts (referencing the forestry exemption situation that presented problems at Hard Labor Creek Reservoir).

Q (USACE): Since this reservoir is not proposed as a water supply reservoir, can we assume that drinking water reservoir rules related to watershed protection will not apply? Have State representatives thought about buffers and watershed protection requirements?

A (EPD): EPD stated that this is still an unresolved issue, but they are hoping to resolve it soon and will coordinate with USACE.

Q (EPA): If this project is built as a flow augmentation reservoir and the Applicant later decides to convert the project to a water supply reservoir, how will the State permit and address it?

A (EPD): There are differences in buffer regulations for a water supply reservoir vs. a flow augmentation reservoir (e.g. construction variances needed for water supply reservoirs). In addition, timing needs to be looked at carefully (i.e., stumps are left in place, how everything affects calculating permit fees, land use changes, etc.).

Q (EPD): What is the distance between the pump station intake point (for pumping water to the existing Cedar Creek Reservoir) and the discharge point (for the water pumped from the proposed Glades Reservoir to the Chattahoochee River)? Will there be 20 feet of dry river section where no boats can go through in a drought in the future?

A (USACE): This is currently a conceptual design provided by the Applicant. It is not clear how many feet are between the intake and return points.

Q (WRD): From a wildlife resources management and recreation standpoint, WRD is interested in how the proposed project will impact recreational access for anglers and general boaters (in the Chattahoochee River).

A (USACE): Based on what is proposed by the Applicant, water withdrawals from the Chattahoochee River to the Cedar Creek Reservoir are proposed to occur 100% of the time (every day). Water from the Glades Reservoir will supplement the flow in the Chattahoochee River downstream of the pump station and a minimum flow will be maintained.

Proposed Development of Surrounding Property

Q (EPA): What is proposed for development around Glades Reservoir?

A (USACE): Hall County owns the footprint of the reservoir up to 1180 feet mean sea level. No other development plan has been provided at this time.

Q (EPA): Does the County indicate there has been platting of the property?

A (USACE): Based on discussions with the Applicant during the site visit to the area, probably not. The Applicant recognizes the buffer requirement around the proposed reservoir.

C (EPA): It is recommended that potential impacts from development be evaluated as secondary cumulative impacts.

C (EPD): If the Glades Reservoir is not a water supply reservoir then it would require a 75-foot buffer from the reservoir boundary. A water supply reservoir requires a 150-foot buffer from the reservoir boundary.

Q (EPA): Is there any idea of what could be happening (as far as development plans) around the reservoir?

A (USACE): This information might be found in the County zoning maps or in the comprehensive plan for the County. We are not aware of any proposed rezoning of the area around the reservoir.

Pump Station Operation

Q (EPD): Is there a proposed pump station at the Glades Reservoir that pumps back to the river or are they proposing to use reversible pumps at the river?

A (USACE): A pump station was proposed at the Glades Reservoir to pump back to the Chattahoochee River. The proposed project will use the same pipeline to move water between the proposed Glades Reservoir and the Chattahoochee River.

Uses of Reservoir

Q (EPD): Will boats be allowed on the reservoir?

A (USACE): The application did not address this question: it will depend on the County's reservoir management plan.

C (EPA): The EIS should consider all future uses of the reservoir and surrounding watershed to have a comprehensive evaluation on secondary cumulative impacts.

Q (USACE): What if the County wants to build a marina on the lake?

C (GEFA): If GEFA funds are used, it is important to see what GEFA would require and include the use conditions in the EIS.

Q (EPA): Was the project ever considered as a water supply reservoir?

A (USACE): Initially the project was proposed as a water supply reservoir with an estimated annual average yield of 6.4 mgd. Before the Magnuson ruling, the project was going to have limited drawdown and less than full use.

Q (EPA): Is there an opportunity for people to suggest alternatives?

A (USACE): Yes, the public and agencies can suggest alternatives for reservoir configurations, operational scenarios, etc. The alternatives analysis is a critical step of the EIS process. The USACE will be comparing the scenario submitted in the application to a range of alternatives including not having a reservoir (no action) and building a reservoir with different operational schemes.

Water Efficiency Evaluation

Q (EPA): How robust are the Applicant's water efficiency evaluations in the Application?

A (USACE): Hall County stated in the Application that it plans to meet future water conservation requirements of the Metro North Georgia Water Planning District (Metro Water District) and plans to reduce the per capita water demand (from 128 to 120 gallons per capita per day) with these conservation requirements. The Application provided an evaluation based on EPA's water efficiency guidelines for water supply projects. The EIS team will be evaluating these assumptions and the efforts presented by the Applicant.

Q (DCA): Did the County pass their Metro District plan compliance audit (conducted by EPD)?

A (USACE): The EIS team stated that Hall County currently does not serve any customers and is not required to perform an audit. The County is served by the City of Gainesville and private wells. The City of Gainesville is the existing water provider to customers in the City of Gainesville and in Hall County. The City of Gainesville appeared to have passed the audit requirement based on the information presented in the Application. The EIS team will verify this.

Q (EPD): It is possible that the City of Gainesville is considering its own water project? If so, how would the two projects work together?

A (USACE): If EPD knows of another alternative, please make the USACE aware of the potential project or alternatives.

Alternatives Evaluation

Q (EPD): Is the USACE soliciting ideas for alternatives (such as alternative piping scenarios) as well as ideas of environmental impacts?

A (USACE): Yes, we are.

Q (EPD): Has the Applicant submitted information on modeling regarding raising Lake Lanier? Was this option included in the Applicant's alternatives analysis?

A (USACE): The Applicant considered the option of raising the level of Lake Lanier noting that raising Lake Lanier would require congressional authorization and may not be feasible for Hall County's purpose. Alternatives need to be submitted by April 17, 2012. The cooperating agencies will have more

opportunities for input, but the USACE would prefer to receive comments on alternatives by April 17, 2012, if possible.

Alternatives Identification and Screening Process

AECOM briefly discussed alternatives identification and screening process. A wide range of alternatives will be identified by the EIS team, followed by an initial screening process. The screening process will be conducted with input from the cooperating agencies to eliminate alternatives based on a set of criteria.

C (EPA): EPA is very interested in participating and being involved in this discussion of defining the criteria and screening process.

A (AECOM): The cooperating agencies will have opportunities to provide input during the alternatives analysis process.

Q (EPA): Will all criteria and alternatives be included in the draft EIS?

A (USACE): The list of all alternatives suggested and screening criteria will be included in the draft EIS.

C (EPD): The USACE may want to consider the notion of net withdrawals when making a decision. Theoretically 100% could be returned, with net withdrawal of zero. Therefore, the USACE should make sure a high percent of returns get figured in the proposed project, if we get close to the idea of net withdrawals.

A (AECOM): The current return flow assumption used in the ResSim model is 70% return (to the Chattahoochee River Basin).

Q (EPA): To what extent is that assumption supported by a commitment or demonstration of infrastructure to accomplish that? Is that part of the alternatives? Is that part of what the USACE will be evaluating when verifying what the Applicant submits?

C (EPD): You may want to review their master plan to see what has been planned for wastewater treatment and return.

A (USACE): We will evaluate how they came up with their return projection. The reasonableness of the Applicant's projection will be considered in relation to future infrastructure requirements (on a conceptual basis).

Q (EPA): Would part of those assumptions be included in the permit conditions?

A (USACE): We do not know yet. Sometimes permits are issued with special conditions that require submission and prior approval of plans before construction.

Proposed Reservoir Project in South Fulton County

C (USACE): The USACE requested EPD's input on how the EIS team should handle the proposed water supply reservoir project in South Fulton County.

The USACE also requested information from EPD on other applications for potential water supply projects, or alternatives/projects that may conflict with this project or should be included in the cumulative effects assessment.

Scoping Meeting Format

Q (EPD): What is the format and plan for the public scoping meetings?

A (USACE): The meetings will be set up open house style with information stations. There will be about six stations with display boards, and some stations will have computer screens running PowerPoint presentations showing the EIS process or operational scenarios. An EIS team member will be situated at each station to answer questions. People will come in, sign in and stop through each station. A court reporter will be on site to record verbal comments. Computer stations will be set up for the public to submit comments electronically through the website. Comment forms will be available for handwritten comments. The EIS team will be actively answering questions and encouraging the public to record their comments. The USACE has received at least five RSVPs from press representatives planning to attend the media tour at 3:30 PM.

Q (EPD): Will the presentation be on the website?

A (USACE): Yes, it will be posted on the website after the scoping meetings. The AECOM team can transfer files for use by the cooperating agencies if needed.

Comment Submittal

Q (EPD): We have discussed potential negative environmental impacts, but would the USACE want positive impacts or benefits of the project?

A (USACE): We would like all comments, benefits included.

C (USACE): The best way for agencies to comment is to submit a letter on scoping from the agency that includes both comments and questions. The agency representatives can contact Richard Morgan or Katie Freas if there are any questions.

The meeting was adjourned at 10:30 am (EST).

Meeting Attendees

Staff in Attendance

Richard Morgan (USACE)
David Crosby (USACE)
Tracy Robillard (USACE)
Melanie Casner (USACE)
Tai Yi Su (AECOM)
Stephanie Gardner (AECOM)
Blaine Dwyer (AECOM)
Pamela Burnett (AECOM)
Robert Esenwein (AECOM)
Rebecca Brofft (AECOM)
Brian Rochester (Rochester & Associates)

Cooperating Agencies in Attendance

Jennifer Derby (EPA)
Rosemary Hall (EPA)
Jamie Higgins (EPA)
Gail Cowie (EPD)
Kevin Farrell (EPD)
Jennifer Welte (EPD)
Bennett Weinstein (EPD)
Wei Zeng (EPD)
Dong Ha Kim (EPD)
Tom Woosley (EPD)
Keith Parsons (EPD)
Clay Burdette (EPD)
Kirk Chase (EPD)
Jon Sommons (EPD)
Larry Hedges (EPD)

State Agencies in Attendance

Kevin Kelly (Georgia Environmental Finance Authority)
Matt Harper (Atlanta Regional Commission/Metro North Georgia Water Planning District)
Deatre Denion (Georgia Department of Community Affairs)
Patrick O'Rourke (Georgia Department of Natural Resource - Wildlife Resources Division)