



Hall County Government
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GAINESVILLE, GEORGIA 30503

April 15, 2016

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Mr. Richard Morgan
Senior Project Manager
Department of the Army
Savannah District, Corps of Engineers
100 West Oglethorpe Ave.
Savannah, GA 31401-3640

Re: Glades Reservoir Water Supply Project
SAS-2007-00388

Dear Mr. Morgan:

As you know, Hall County for several years has been pursuing a 404 permit under the Clean Water Act for the purpose of securing a water supply source to meet the projected 2060 need for Hall County. In pursuit of its 404 permit, Hall County has been diligent in providing all necessary information requested and needed by the Corps in its consideration of the county's 404 permit application, and currently Hall County is in the process of providing an Environmental Impact Statement (EIS) as requested. To date, Hall County's efforts in seeking the 404 permit have required the expenditure of several million dollars, including the initial cost of the land, engineering, legal and administrative costs. These expenditures, although substantial, will ultimately prove to be justified if the county is successful in procuring the requested 404 permit for this reservoir and water supply through 2060.

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However, as a result of several recent events, Hall County's permit application has been impacted by influences beyond the county's control. Specifically, these events are:

- (1) Revised population projections by the Georgia Office of Planning and Budget (OPB), as released in July of 2015;
- (2) New per capita water use forecast by the Metropolitan North Georgia Water Planning District and the recently issued draft EIS for proposed updates to the ACF Water Control Manual;
- (3) Georgia EPD's correspondence of January 22, 2016, directed to the Corps of Engineers, in which Georgia EPD's previous Certification of Need for the Glade Reservoir issued in 2013 was rescinded. Furthermore, Georgia EPD has determined that it will not certify a need for any water supply reservoir so long as water needs can be met from Lake Lanier.

Due to these events, and the uncertainty that they have raised concerning the county's ultimate success in obtaining the 404 permit, and because it now appears that Hall County is going to have to redirect its original plan of pursuing its 404 permit, and that doing so is going to require additional time and expense on behalf of the county, Hall County is requesting that its 404 permit application be temporarily withdrawn, allowing the county to gather additional information with which to supplement its application and to further respond to recent information provided by the OPB and Georgia EPD. Additionally, a temporary withdrawal will be beneficial to both the county and the Corps to the extent that final approval of the ACF Water Control Manual by the Corps will give definitive guidance as to Georgia's water needs through 2050. Hall County is of the opinion that such information may very well justify a need for the Glade Reservoir, as well as others of a similar nature.

To be perfectly clear, this request is only for a temporary withdrawal of the consideration of the current 404 permit application, as Hall County fully intends to continue to pursue its 404 permit with all deliberate speed and diligence, once additional information is available.

Accordingly, the county's specific request is that the current 404 permit application be allowed to be temporarily withdrawn until the release of the ACF Water Control Manual as approved by the Corps of Engineers or until earlier request to resume consideration is made by the county. We trust this request for temporary withdrawal of the county's 404 permit application, if granted, will in no way prejudice the county in any resumed consideration of the application by the Corps. If such is perceived by the Corps to be the case, we would ask that we be so advised at your earliest convenience.

Sincerely,

**HALL COUNTY BOARD OF
COMMISSIONERS**

By: 
Chairman

By: 
Commissioner District 1

By: 
Commissioner District 2

By: 
Commissioner District 3

By: 
Commissioner District 4