

1 INTRODUCTION

The United States Army Corps of Engineers (the Corps), Savannah District is currently reviewing an application for a Department of the Army permit pursuant to Section 404 of the Clean Water Act (CWA) for a proposed water supply reservoir (Glades Reservoir) to be located in Hall County, Georgia (Permit Application Number SAS-2007-00388). The Corps has prepared a draft Environmental Impact Statement (DEIS) to determine the direct, indirect, and cumulative impacts of the proposed Glades Reservoir water supply project on the human and natural environment.

The DEIS was released on October 30, 2015, which began a 60-day public comment period that was originally scheduled to end on December 29, 2015. At the request of various agencies and Non-Governmental Organizations (NGOs), the Corps extended the public comment period for an additional 45 days to a total of 105 days, which ended on February 15, 2016. As part of the public involvement effort, the Corps held an Open House and Public Hearing on December 8, 2015, in Hall County, Georgia, to collect comments from the public.

This report summarizes the comments received on the DEIS and describes the public involvement efforts that the DEIS project team undertook during the public comment period. The final EIS for the proposed Glades Reservoir will include responses from the Corps to each of the comments received during the DEIS comment period.

At any point during the comment period, comments could be submitted through the project website, mailed to the Corps address, or emailed to the Corps Regulatory Division email address. In addition, comments were collected at the Open House and Public Hearing through written comment forms and transcription by a court reporter. Meeting attendees were also allowed to give a public verbal comment, which was transcribed by a court reporter.

2 PUBLIC INVOLVEMENT PROCESS

During the 105-day comment period for the Glades Reservoir DEIS, the project team used various outreach tools to notify the public about the availability of the DEIS, ways to submit comments, Open House and Public Hearing details, and upcoming deadlines. The following sections summarize the public involvement efforts that were undertaken during the public comment period for the DEIS.

2.1 Notifications and Mailings

2.1.1 Notice of Availability

A Notice of Availability (NOA) was published in the Federal Register on October 30, 2015, and notified the public that the DEIS was available to be downloaded through the project website at <http://gladesreservoir.com/eis-documents> and through the Environmental Protection Agency (EPA) website (<https://cdxnodengn.epa.gov/cdx-enepa-ll/public/action/eis/details?eisId=180001>). The NOA

also provided details about the upcoming Open House and Public Hearing and listed the various methods that the public could use to submit comments on the DEIS. A copy of the NOA is included in Appendix A.

2.1.2 Notification Postcard

A notification postcard was mailed out on November 24, 2015, to 671 property owners whose property either lay alongside or was adjacent to proposed pipeline routes or reservoir locations. The proposed pipeline routes and reservoir locations were overlaid on a GIS database of property owners. Additionally, the notification postcard was mailed out to local government officials on December 3, 2015. A copy of the postcard is included in Appendix B.

2.1.3 News Releases

The Corps issued a news release on October 30, 2015, and a Public Notice on November 12, 2015. Both documents were posted to the project website and available to download at <http://gladesreservoir.com/news-releases>. Copies of these documents are included in Appendix C.

2.1.4 Legal Notice

The Corps published two rounds of legal notices in the Atlanta Journal-Constitution (AJC) and the Gainesville Times. The legal notice appeared in the AJC on November 8 and November 9, 2015, as well as November 23, 2015. The legal notice was published in the Gainesville Times on November 8 and November 9, 2015, and November 23, 2015. Copies of the notices and newspaper affidavits are included in Appendix D.

2.1.5 Project Website and Email Notifications

The project website, <http://gladesreservoir.com/>, was updated regularly throughout the DEIS comment period. The DEIS was made available to the public on October 30, 2015, and documents relating to the DEIS were uploaded as they became available. The project website included information about the Open House and Public Hearing and also included a comment form that visitors to the website could use to submit comments on the DEIS.

As new materials became available or updates were made to the project website, the Glades DEIS project team sent out notification emails detailing the changes to a stakeholder list that contained the email addresses of project contacts, cooperating agency contacts, NGOs, local politicians, and any member of the public that signed up through the project website email list or indicated during the scoping period that they would like to receive email notifications. The Glades DEIS project team sent out email notifications on the following dates:

- October 30, 2015
- November 20, 2015
- November 30, 2015
- December 22, 2015

- February 15, 2016

2.2 Open House and Public Hearing

The Corps hosted an Open House and Public Hearing on December 8, 2015, at the Hall County Board of Commissioners' Auditorium, located at 2875 Browns Bridge Road, Gainesville, Georgia, 30504. Subject-matter experts (including members from the Corps and its third-party consultant, AECOM) were available to present the DEIS to the public and answer questions regarding the DEIS and to facilitate public commenting on the DEIS.

2.2.1 Meeting Format

The Open House ran from 5:00pm to 6:00pm and allowed the public to review the DEIS, speak to subject-matter experts and Corps personnel, and submit comments through the project website (by a provided laptop), a written comment form, or by dictating a comment to a court reporter. Informational boards were set up along the hallway to the auditorium. Copies of the informational boards and written comment form are included in Appendix E.

The Public Hearing portion of the meeting went from 6:00pm to the time that the last public verbal comment was finished. Colonel Marvin Griffin, PE, and David Lekson, PWS, from the Corps began with a short presentation that covered the DEIS process and the public commenting opportunities. This presentation is included in Appendix F.

3 COMMENT ANALYSIS

Comments were received during the DEIS comment period in the following ways:

- Project website comment form
- Comment forms (submitted at the Open House and Public Hearing)
- Mailed comment forms
- Mailed letters
- Emailed letters
- Emails
- Verbal comments submitted to a court reporter (at the Open House)
- Verbal comments given at the Public Hearing

All submittals were scanned and/or stored electronically. A database was used to compile and categorize comments and generate summary reports. Typically, written and verbal comment submittals contain multiple comments on various topics. All submittals received during the DEIS comment period were reviewed by the project team and individual comments within each submittal were entered into the database. Comments were then categorized by topic. Where comments applied to several topic categories, they were categorized under each subject, ensuring that each comment was fully captured and assessed relative to the scope of the project.

3.1 Summary of DEIS Comments

The following sub-sections provide an analysis of comments received by format, by commenter, and by major topic (resource area) categories.

3.1.1 Comments Received

The Corps received a total of 57 comment submittals during the 105-day comment period. Table 1 and Figure 1 summarize the number of submittals received by media format. Some commenters made submittals using multiple formats (e.g., submitted comments on the website and also through a letter). This table counts only one of the submittals to avoid any confusion caused by the duplicates. Some submittals were received on behalf of multiple parties, which were counted as a single submittal based on the lead author of the comment.

Table 1. Summary of Comment Submittals by Media Format

Format	Number of Submittals	Percent of Total
Comment Form (submitted at Open House and Public Hearing)	3	5%
Comment Form (submitted through mail)	2	4%
Email	7	12%
Letter (emailed)	13	23%
Letter (mailed)	2	4%
Verbal Comment (Open House Court Reporter)	3	5%
Verbal Comment (Public Hearing)	7	12%
Website (Comment Form)	20	35%
Total	57	100%

Figure 1. Percentage of Comment Submittals by Media Format

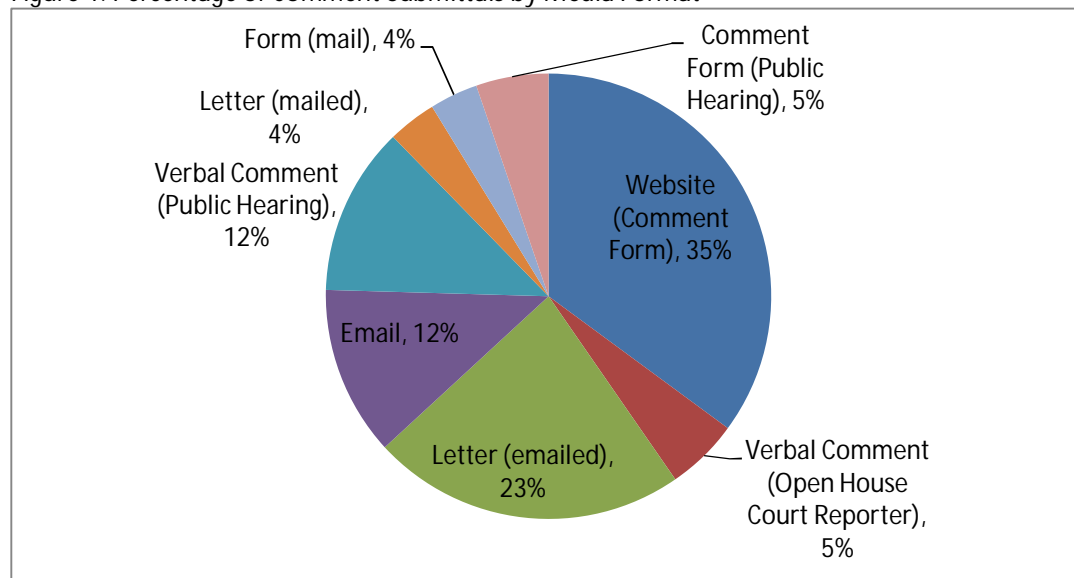
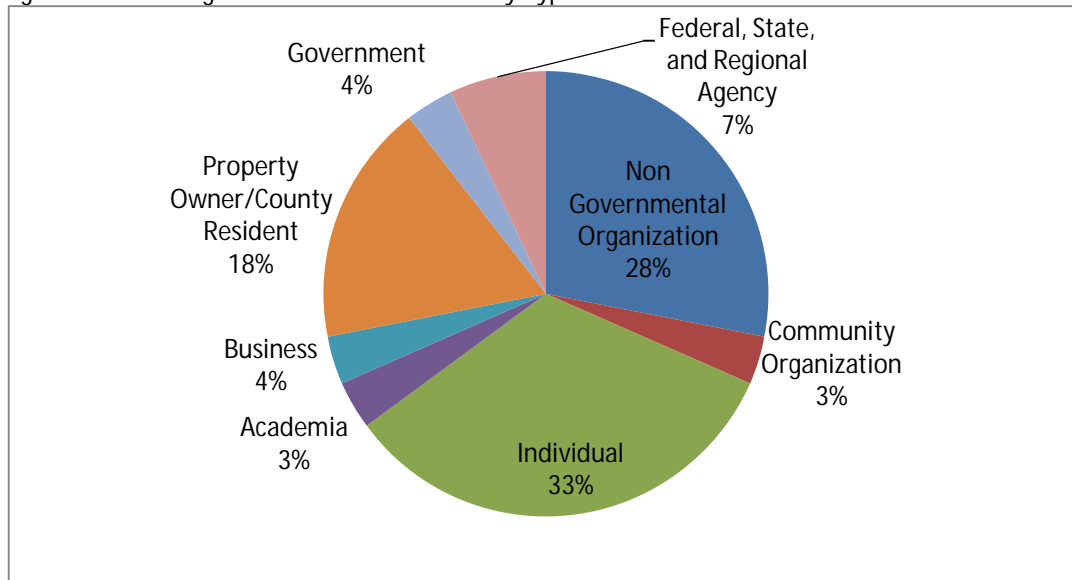


Table 2 and Figure 2 summarize the number of submittals received by type of commenter: public (individuals, property owners/county residents, academia, and businesses), governments, agencies (federal, state and regional), and NGOs.

Table 2. Summary of Comment Submittal by Type of Commenter

Group	Number of Submittals	Percent of Total
NGO	16	28%
Community Organization	2	4%
Individual	19	33%
Academia	2	4%
Business	2	4%
Property Owner/County Resident	10	18%
Government	2	4%
Federal, State, and Regional Agency	4	7%
Total	57	100%

Figure 2. Percentage of Comment Submittal by Type of Commenter



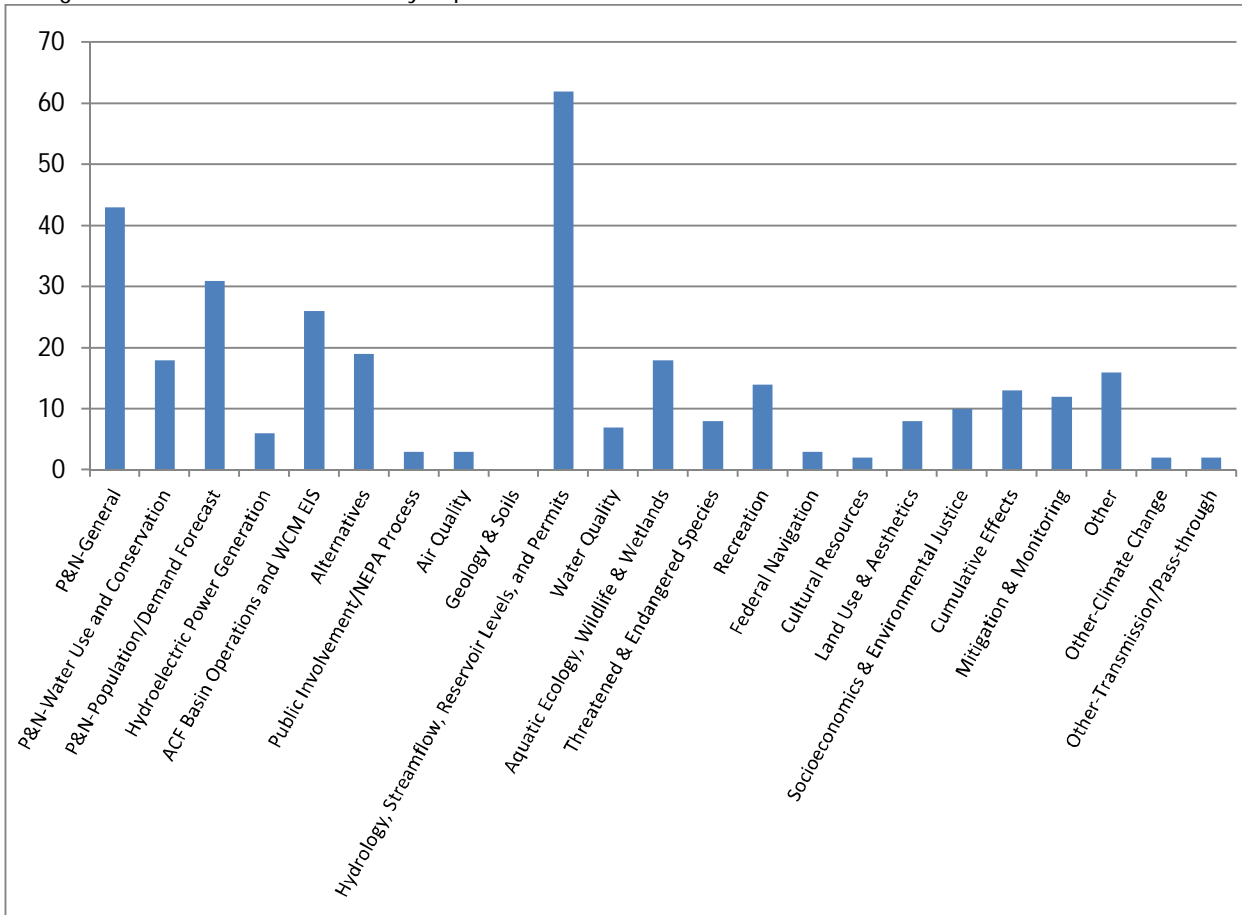
3.1.2 Comments by Category

Within the comment submittals, individual comments were identified. A total of 326 individual comments were identified from the 57 submittals. Each individual comment was organized by topic and recorded in the comment database. Table 3 and Figure 3 present the number of comments received by topic. These totals include comments on the proposed Glades Reservoir submitted by the EPA and Georgia Environmental Protection Division (EPD) for the Apalachicola-Chattahoochee-Flint (ACF) Basin Water Control Manual (WCM) EIS.

Table 3. Number of Comments by Topic

Comments by Category	Total
Project Purpose and Need-General	43
Project Purpose and Need-Water Use and Conservation	18
Project Purpose and Need-Population/Demand Forecast	31
Hydroelectric Power Generation	6
ACF Basin Operations and WCM EIS	26
Alternatives	19
Public Involvement/NEPA Process	3
Air Quality	3
Geology and Soils	0
Hydrology, Streamflow, Reservoir Levels, and Permits	62
Water Quality	7
Aquatic Ecology, Wildlife and Wetlands	18
Threatened and Endangered Species	8
Recreation	14
Federal Navigation	3
Cultural Resources	2
Land Use and Aesthetics	8
Socioeconomics and Environmental Justice	10
Cumulative Effects	13
Mitigation and Monitoring	12
Other	16
Other-Climate Change	2
Other-Transmission/Pass-through	2
Total	326

Figure 3. Number of Comments by Topic



4 COMMENT SUMMARY

The comments submitted by each group of commenter are summarized in this section. The sub-sections are organized by commenter and listed in an alphabetical order. The full comments for each topic/resource area are presented in Appendix G. The percentage of comments received by commenter type (e.g. agencies, individuals, NGOs) for each topic can also be found in Appendix G.

4.1 Governments and Agencies

4.1.1 City of Gainesville

On behalf of the City of Gainesville (Gainesville), King and Spalding commented on the DEIS for the Glades Reservoir. The letter stated that " *the proposed project should be reconsidered, because, [...] it will not be needed as a water supply source before 2050. Any water needed by Hall County before that time should be supplied by Lake Lanier.*" Gainesville stated that Lake Lanier is " *the preferred water supply alternative because it is cheaper and it already exists. If purchased from Lake Lanier, the storage needed to yield 40 mgd [million gallons per day] would cost just \$11.1 million (or about \$640,000 per year over 30 years)*". Gainesville stated that " *We understand that the proposed Glades Farm Reservoir may be*

reconfigured for non-water supply purpose. It may also be eventually needed to meet water supply needs after 2050, or even sooner if Mobile District declines to allocate sufficient storage in Lake Lanier to meet entire projected metro demand." Gainesville takes no position on any such possibilities but will evaluate a specific proposal that is presented.

4.1.2 State of Georgia—Environmental Protection Division

Georgia EPD provided written comments on September 25, 2015. In this letter, the EPD addressed the revised population projections released by the Office of Planning and Budget and requested that the Corps evaluate the revised projections impacts on purpose and need. On December 4, 2015, the Georgia EPD submitted a revised water supply request for the State of Georgia to the Corps' Mobile District. This letter is included in Appendix H.

The State of Georgia submitted a comment letter on February 15, 2016. The letter stated that *"all of Hall County's water supply needs through 2050 should be provided from Lake Lanier, and thus, the Glades Reservoir Project is no longer part of any strategy to meet the water supply needs of the State of Georgia through 2050. Because the Glades Reservoir Project will not be constructed and operated for water supply during the planning horizon of the State's 2015 Request and is not needed for this purpose, the Georgia EPD on January 22, 2016 rescinded the certification of need previously provided to Hall County on April 9, 2013."* The letter stated that *"there is no need for a water supply Glades Reservoir and the Corps should not finalize the Draft Environmental Impact Statement for the Glades Reservoir Project as contemplated in Hall County's present 404 application."*

4.1.3 State of Alabama

The State of Alabama provided written comments on February 15, 2016. Within these comments, Alabama indicated that they have substantial interests in the ACF basin, and that their requirements for water supply, economic growth, recreation, and navigation should be considered when a proposal to modify ACF conditions is considered. Alabama indicated that they believe that the National Environmental Policy Act (NEPA) process has been undermined for this project by Georgia and the Corps making inconsistent statements about the plans for the Glades Reservoir and Lake Lanier, including the State of Georgia's most recent statement that Glades Reservoir was no longer part of Georgia's water supply strategy. They also maintain that *"the Corps cannot allocate Buford storage for Hall County's withdrawal on top of the proposal in the draft ACF manual"* Alabama stated that the Corps must seek Congressional approval on both Georgia's water supply request (for reallocation of 205 mgd for direct withdrawal from Lanier) and on specifically allocating additional withdrawals to Hall County (including under proposed pass-through scenarios). The letter also stated that *"Regardless, given Georgia's comments on the ACF draft manual, it is likely that Georgia may take a position on the Glades draft EIS that is premised on the erroneous assumption that the Hall County water could come directly from Lanier. The Corps should reject that assumption when formulating its ACF policy moving forward."* Alabama indicated that they feel downstream impacts to the ACF basin are understated in the DEIS including the effects on navigation, water quality, and return flows. Alabama also maintains that the existing authorized withdrawal from Lake Lanier is only 8 mgd, and that the existing 18 mgd withdrawals

are not appropriately authorized. Alabama requests that the Corps consider the revised population and demand projections, and analyze their impacts on the potential alternatives. Additionally, Alabama has requested modeling data for the DEIS to further analyze the Glades proposal.

4.1.4 Environmental Protection Agency

The EPA provided written comments on February 16, 2016.

EPA referenced EPD comments on the ACF WCM Update DEIS, which stated that Glades was no longer part of the region's water supply strategy, and requested that the Corps reconsider the project purpose and need. EPA highlighted inconsistencies in assumptions and modeling between the Glades DEIS and the WCM Update DEIS and requested that the two analyses be more consistent especially in regards to modeled impacts to Lake Lanier elevations. EPA requested additional information about the Corps policy change regarding pass-through, including likelihood and timeframe for policy approval.

EPA offered the following specific comments:

- Use revised population and demand projections in the EIS and additional water conservation measures be considered within the alternatives.
- Request Hall County to provide a written commitment on conservation measures included in the alternatives and their timelines for implementation and maintenance.
- Provide additional details on poultry water usage and Federal (USDA) requirements that dictate water usage. Firm delineation of the project study area, with commitments from all agencies involved in the supply of water (Hall County and the City of Gainesville).
- Include additional clarification on per capita water usage including basis of total demand calculations, system specific usage patterns, identification of historical fluctuations in loss and any losses in efficiency, and definition of what billing data was used as baseline (should not be single year, EPA recommends using at least 5 years of data).
- Use the baseline condition as the No Action Alternative assuming no additional allocations from Lake Lanier
- Consider additional allocation of water from Lake Lanier as a separate Action Alternative, which EPA believes could be the least environmentally damaging practicable alternative (LEDPA).
- Compare Lake Lanier levels and other metrics from the alternatives analysis to the baseline condition, assuming no additional allocations from Lake Lanier.
- Provide a more in depth analysis of benefits of storing water in Glades vs Lake Lanier including comparison of lake volumes, number of days of supply, timing and volume of withdrawals, releases from Glades, trigger mechanisms, and means of determining insufficient water supply.
- Consider alternate configurations of Glades to downsize the reservoir with potential decreasing need
- Provide additional information and illustration on how storing water in Glades provides a gain to the ACF system.
- Include additional data regarding the quality of onsite streams and wetlands at both Glades and White Creek reservoir sites, and address compensatory mitigation feasibility in the EIS.

- Suggest the Corps to spell out permit conditions in EIS
- Require source water protections such as stream buffer requirements regardless of transmission schemes
- Include additional information on how evaporation was calculated
- Add a discussion on climate change and foreseeable climate change impacts
- Verify all web links used in the EIS
- Consider permanent losses (streams and wetlands) and explain how some “benefits” of the project are assessed

In addition, EPA indicated that they do not support the instream flow protection threshold (IFPT) approach currently used in the DEIS, and request that this analysis be re-named a Minimum Instream Flow analysis. EPA requests that EPA approved State Water Quality standards be used as the basis for the IFPT instead of the Georgia Interim Flow Policy. EPA would like to see an alternative IFPT analysis be performed that is based on a range of flows, and flow-ecology relationships, not minimum flows. They request that the safe yield analysis be separated from in IFPT analysis (EIS should identify flows protective of aquatic life first) and that additional data be provided to allow easier comparison of potential change in flows with different pumping capacities. They also request the additional representative sensitive species be used in the PHABSIM analysis, and that additional field sampling be conducted. Also EPA requested additional data on how water depths and widths were determined to be protective of the aquatic community and recreation.

4.2 Non-Governmental Organizations

4.2.1 American Rivers

In the letter submitted on February 15, 2016, American Rivers suggested that the Corps deny the Glades Reservoir Section 404 permit application because “*it is not needed for water supply*” and “*the population projections and water demand projections used to develop the Glades Reservoir proposal were flawed and do not support the reservoir proposal*”. They are concerned that the proposal would have significant impacts on the communities and natural resources not only in the project area, but downstream in the ACF Basin. In addition, American Rivers had concerns regarding cumulative water consumption in the ACF River Basin in which “*water availability is constrained in drought years.*”

4.2.2 Apalachicola Riverkeeper

The Apalachicola Riverkeeper submitted a letter on February 15, 2016, that detailed their various comments on the Glades Reservoir DEIS. They opened the letter with a general concern over the cumulative effects the project might have on the waters and land within the Apalachicola River Basin. They argue that construction of the Glades Reservoir will impact the operation of the ACF system by the Mobile District and that a new instream flow assessment will be required to assess the needs of downstream users. They further argue that the proposed Glades Reservoir will diminish streamflow in the ACF basin, thereby impacting the fish, shellfish, and wildlife (including threatened and endangered species) in the Apalachicola Bay. Additionally, they are worried about the potential effects on water

quality, which could harm the oyster, crab, fish, and shrimp species in the bay. As they are a group focused on the interests in the downstream portion of the basin, Apalachicola Riverkeeper states that the water use by the State of Georgia is harming the rest of the basin. They take issue with the use of 7Q10 to develop instream flow requirements because they feel it does not adequately protect fish and wildlife resources. Apalachicola Riverkeeper also cites the uncertainty of Lake Lanier allocation and the risks involved in determining future impacts as issues of concern. They maintain that the proposed action would violate Florida state law and that members of the Apalachicola Riverkeeper use the bay for various recreational and commercial uses that would be harmed by further withdrawals from the system.

4.2.3 Chattahoochee Riverkeeper

The Chattahoochee Riverkeeper submitted a comment letter (February 15, 2016) that was also supported by the Southern Environmental Law Center (SELC). Chattahoochee Riverkeeper stated that the Corps should reject the permit and that the Applicant should withdraw its application based on the State's rescinding of the certificate of need for the project (due to the lowered population projections). In addition, Chattahoochee Riverkeeper also questioned various aspects of the Alternatives screening process and the lack of formal consultation with the U.S. Fish and Wildlife Service (USFWS) [*Note from the Corps: the USFWS declined to be a cooperating agency for this EIS*]. The Chattahoochee Riverkeeper believes that there is no need for the project and that conservation was not adequately considered. They also maintain that the Savannah District and the Mobile District are not coordinating and that the differences between the WCM DEIS and the Glades Reservoir DEIS should be reconciled. They called out the potential impacts to farmland, cultural resources, species of concern, aesthetics, and water quality at the location of and downstream of the alternatives. Specifically, they criticized the Corps' handling of impacts to wildlife and threatened and endangered species, and stated that the DEIS did not contain enough information regarding potential impacts or mitigation efforts. With regards to streamflow, they questioned whether the IFPTs designated for Flat Creek, White Creek, and the Chattahoochee River below the proposed intake were adequately protective of habitats for fish and bird species. Additionally, they commented that the proposed Glades Reservoir and alternatives would decrease streamflow and reservoir levels below the proposed intake location. Chattahoochee Riverkeeper was dissatisfied with the handling of potential impacts to air quality in the DEIS, as well as the wetland and stream impact evaluation. They argue that the Corps focuses recreational impacts on lake levels and does not take into account the impact that water quality variations would have, and disagrees with the approach that the Corps took in evaluating these impacts from the perspective of boaters or kayakers and not including other recreational uses (e.g., swimming, hiking, and birding) in the analysis. They argue that funding will no longer be available through the Governor's Water Supply Program since the certification of need was revoked, and therefore the full cost of construction would be paid by Hall County residents. They took issue with numerous aspects of the cumulative effects analysis, especially considering the Mobile District's proposal to lower seasonal flows in the Chattahoochee River below Buford Dam. Chattahoochee Riverkeeper ended their formal comments with a list of recommendations which included requests to specify the timeline and permit conditions, and use the most recent population and water demand projections.

4.2.4 Chattahoochee RiverWarden

A representative from the Chattahoochee RiverWarden submitted comments through the project website. They stated that the need for the proposed Glades Reservoir no longer exists because of the updated population projections and that it is an amenity lake rather than a water supply reservoir. They also added that evaporation should be considered.

4.2.5 Georgia Canoeing Association

The Georgia Canoeing Association (GCA) provided comments in response to the DEIS (February 15, 2016). The email stated that “GCA Board of Directors opposes the building at this time of the proposed Glades Reservoir, which we regard as an inefficient, very expensive, and ineffective way to meet Georgia’s water supply needs. Moreover it would be unnecessarily destructive to the environmental and the recreational resources of the Flat Creek and Upper Chattahoochee watershed.” The association mentioned that Flat Creek is a beautiful area and the area downstream of Hwy. 52 is listed in American Whitewater’s National Whitewater Database. They stated that “pumping water from the Upper Chattahoochee River Trail a short distance downstream of its Mossy Creek access area could significantly degrade that trail’s recreational experience for boaters and fishermen in the six river miles from Mossy Creek to the Belton Bridge Park and put its excellent fishery at risk.” Another concern revolves around Flat Creek’s transport of high levels of suspended solids which could lead to the need for dredging before the reservoir was even needed if it was built now. The GCA also does not oppose keeping the land purchased by Hall County for the reservoir “in public ownership to protect now Flat Creek’s and Lake Lanier’s water quality and riparian flora and fauna; to provide an attractive natural area adjacent to areas which might be residentially developed; and to bank the land for possible future use for water storage, should population growth and the siltation of Lake Lanier make such desirable”. They are in favor of holding onto the land purchased by Hall County and potentially building a reservoir eventually when the need becomes greater, due to the new population projections. The association does not think the reservoir should be paid for publically and the cost benefit analysis makes it plain that Georgia cannot afford Glades. GCA requests that the Corps 1) re-evaluate the project in light of most recent population and water demand information; 2) scrutinize Hall County’s water conservation program and reassess use of more cost-effective options such as the existing reservoirs lake Lanier and Cedar Creek reservoirs, to ensure the LEDPA; 3) require sufficient mitigation to offset impacts to fish, wildlife, and wetlands, and to 4) adequately asses the impacts of Glades on pool elevation and releases.

4.2.6 Georgia River Network

The Georgia River Network asks the Corps to deny Hall County’s Section 404 permit application in light of recent actions by the State of Georgia due to population projection changes. It also commented on the project plan changes over the past 5 years, as well as limited information regarding the special permit conditions.

4.2.7 Lanier Striped Bass Coalition

A member of the Lanier Striped Bass Coalition used the project website to submit comments. Their comments were questions regarding how the proposed reservoir would affect prop-driven boats above

Lula Bridge and the ability of recreational anglers to launch boats from the areas around Lula Bridge and Belton Bridge.

4.2.8 Southern Environmental Law Center

SELC provided written comments on August 19, 2015 and November 5, 2015 on behalf of the Chattahoochee Nature Center. Additionally, Gil Rogers, from SELC, made verbal comments at the Glades public hearing on December 8, 2016. August comments addressed the updated population and water demand projections from the Metro North Georgia Water Planning District (MNGWPD), and requested the Corps to address the revised projections. November comments included a request for an extension on public comment submission. December comments reiterated the need to address updated population and demand projections, requested that raising the pool level of Lake Lanier be evaluated more thoroughly as an alternative, and requested that additional analysis be done on cumulative effects and indirect impacts such as additional growth and development spurred by reservoir construction. Additionally, the SELC indicated that any permitting decision on Glades would be premature until the ACF WCM EIS is finalized. A full transcript of the verbal comments from the public hearing is included in Appendix G.

4.3 Community Organizations

4.3.1 Lake Lanier Association

The Lake Lanier Association (LLA) stated in their February 15, 2016 email that it believes that “increasing population in Metro Atlanta will place substantial new demands on Lake Lanier”, and “more stored water in the Metro area is a positive contribution to Lake Lanier. The direct and indirect value of Lanier as a magnet for population growth is undeniable.” LLA stated that although river flow is currently taken into account for instream flow protection, the level of Lake Lanier should also be a factor. The association requests a lake level of 1066 feet to be incorporated for the refilling constraint of Glades due to historical drought events. The letter stated that “No water should be added to Glades as long as Lake Lanier is at or below an elevation of 1066 feet msl [mean sea level].”

4.3.2 Southeastern Federal Power Customers

The Southeastern Federal Power Customers, Inc. (SeFPC) asked that the Corps stop work on evaluating the 404 permit application. They maintain that the Corps underestimates the value of hydropower in the effects analysis of the DEIS and measures the impacts without considering marking area or the value of peaking power. They disagree with the way the ACF system is managed by the Corps' Mobile District, and that unfair approach to the system is reflected in the Glades Reservoir DEIS. SeFPC argues that the DEIS does not do a thorough job of analyzing socio-economic impacts and questions the assumption within the No Action Alternative that the water supply need cannot be met by Lake Lanier. They wish for the Corps to suspend any action on the 404 permit until the ACF WCM EIS is finalized and all litigation is finished.

4.4 Individuals, Businesses, Academia, and County Residents

The Corps received a total of 74 comments from individuals, businesses, academia, and county residents. Many of these comments expressed the opinion that the proposed Glades Reservoir is not needed, or that the need should be reevaluated in light of the updated population data. Several commenters also mentioned that increased conservation or the use of Laker Lanier should be considered instead of construction of a new reservoir. A few comments supported the need for the reservoir to secure future water supply for the county. The commenters identifying themselves as county residents spoke about the impacts that would affect their land directly. Socioeconomics was also a common concern, as the commenters spoke about the cost of the project and the land that would be needed for the alternatives and pipeline routes. A few comments focused on the effects to threatened and endangered species and the analysis in the DEIS. Reservoir levels and streamflow were mentioned in several comments. Topics that were mentioned briefly include alternatives, ACF basin operations, and land use and aesthetics.