



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
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APR 06 2011

Engineering Division

SUBJECT: Comments on the Martin Dam Project (FERC Project No. 349) Preliminary Licensing Proposal

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Secretary Bose:

Through Alabama Power Company's (APC) submitted Preliminary License Proposal and Supporting Documents (PLP), it appears to imply that the U.S. Army Corps of Engineers (Corps) supports raising the winter pool rule curve at Martin through the Multi-Criteria Decision Analysis decision matrix. While we do not object to the study of these alternatives, the Corps has no specific authority to regulate flood control at this project and has certainly not provided any recommendation for any of these alternatives. Based on the information below, the proposed change to the operation of Martin Dam demands a more rigorous modeling analysis, especially in regard to downstream flood control impacts, support of navigation, and minimum flow requirements.

Single flood events, such as the 100-year design flood, may be sufficient for screening the 24 alternatives. However, the final alternative selection and evaluation should include modeling of multiple flood events with varied rainfall distributions. This should also include analysis that considers storm events with multiple peaks. Simulated flood events should occur during different periods of the flood guide curve; such as winter, spring refill, and fall drawdown to demonstrate the level of flood damage reduction provided through the year. The PLP indicates that APC will select one of the five alternatives to present in the Final License Application on or before June 8, 2011.

Concerning modeling data already submitted, the starting times of simulations are unclear for winter pool, summer pool extension, and early refill alternatives. The Corps asks that this information be provided for the start and end dates of the modeled simulations. It is also mentioned that the Corps' HEC ResSim model would be used for further modeling once modifications were in place to make this software applicable. Issues regarding the HEC ResSim Martin flood control rules have been resolved. The Corps recommends that APC reconsider using HEC ResSim to perform the flood control operations modeling as a replacement to APC's Project Routing Model.

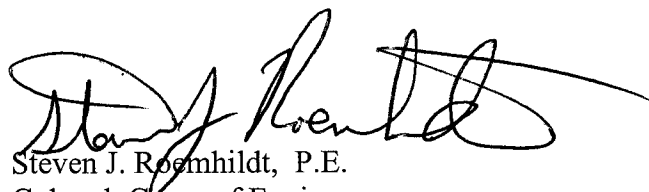
The project provides limited seasonal flood control when the reservoir is in the drawdown condition, but the PLP seems silent on the impact of raising the winter pool for the selected alternatives. There are increases in downstream river levels identified in the "Final Report Study Plan 12(A) Flood Control Guideline Change Model Analysis." The Corps requests more

information on the resulting impacts of these guide curve changes, such as change of operation or higher downstream releases resulting from these higher pools. The PLP should be revised to include these increased flooding effects.

The additional modeling recommended above is also needed to determine the effects of the proposed changes on navigation support. APC makes releases from the Martin Project to support navigation on the Alabama River pursuant to a minimum flow agreement with the Corps. The Martin Project is vital because of the significant amount of storage it contains, and the Corps would be interested in any impacts the proposed changes would have on navigation flows.

However, we are also in the midst of updating the master water control manual for the Alabama-Coosa-Tallapoosa (ACT) River Basin. One component of this update is a basin-wide drought plan that includes water control regulation for the Corps multipurpose projects in the headwaters (Lake Allatoona and Carters Lake), APC's projects on the Coosa and Tallapoosa Rivers, and the Corps' multipurpose projects downstream of Montgomery (Robert F. Henry, Millers Ferry, and Claiborne Locks and Dams). This plan is being developed in close coordination with APC, and it will reflect a system-wide perspective and basin-wide regulation; when complete, we expect it will complement and synchronize operations so as to best meet Federal, State, and APC requirements during drought. Accordingly, the Corps' main concern is not to have conditions in the FERC license regarding drought operations that do not coincide with our basin-wide drought plan or even possibly the Alabama Drought Management Plan, both of which are still under development. Therefore, the Corps requests that FERC defer final approval of any drought plan for this project until we have completed the update of the master water control manual and drought plan for the ACT Basin. I am forwarding a copy of this letter to Mr. James F. Crew, Manager, Hydro Services, Alabama Power Company.

Sincerely,



Steven J. Roemhildt, P.E.
Colonel, Corps of Engineers
District Commander