



2544 Willow Point Road, Alexander City, AL. 35010 256-329-0835

J. Charles Borden, Pres
John E. Thompson, VP
Will Denton, Secretary
Tom Lamberth, Treasurer
Steve Forehand, Legal
B. J. Barnett
Bill Brown
Jerry Bynum
Rendell Clark
Phillip Gidiere
Tammy Jackson
Bill Harper
Ben Russell
C. Wayne Shell
Larry Tuggle
Norman White
Steve Windom

March 11, 2011

Via Electronic Filing

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: Proposed Study Plans for the Martin Dam Project (FERC No. 349)

Dear Secretary Bose:

The Lake Martin Resource Association, Inc. ("LMRA") is a non-profit corporation currently comprised of 1,200 members. The Certificate of Incorporation of LMRA (formerly known as the Lake Martin Recreation Association, Inc.) states that its purpose is:

"To improve and increase the quality and quantity of recreational opportunities on the water and the land adjacent to the water that makes up the reservoir known as Lake Martin, the same being situated in East Alabama and in the Counties of Tallapoosa, Elmore and Coosa. It shall further be the purpose of this corporation to foster stable water conditions; improve the fish and stock of fish; organize and engage in recreational activities for people of all ages; improve markings and directions for people who use the waterway; to aid and develop the stopping of pollution of said water; to work with all appropriate federal, state, and local agencies to make this Lake a safe place for fishermen, skiers, boaters, and all other persons who want and wish to use this water and its adjacent areas for the purpose of recreation and sport."

LMRA was incorporated in 1970 and intervened in the re-licensing proceedings involving Alabama Power Company ("APCO") and the Federal Power Commission (now known as the Federal Energy Regulatory Commission) on behalf of recreational users and property owners on Lake Martin. During the course of the re-licensing proceedings, LMRA played a central role in brokering compromise agreements among APCO, itself and other interveners to preserve the recreational uses of Lake Martin.

This letter is written in response to the letter of February 25, 2011, filed on behalf of Alabama Rivers Alliance, Lake Martin Home Owners and Boat Owners Association ("HOBO"), American Rivers, Central Elmore Water and Sewer Authority, Tallapoosa River Downstream Landowners Group, and World Wildlife Fund (collectively referred to herein as the "Complaining Group"). This letter is also in response APCO's letter of March 2, 2011, that responded to the Complaining Group's letter of February 25, 2011. LMRA has participated in the Integrated Licensing Process ("ILP") as a stakeholder from the beginning of the ILP, a time period of over 3 years. During that time, LMRA has offered suggestions, filed comments with FERC, submitted data, independent studies, photographs, GIS information, and other stakeholder comments relevant to the ILP. While we have not always agreed with the results on particular issues, we have always had more than one opportunity to state our positions and make a case for our preferences.

In its March 2, 2011 letter, APCO stated that the primary goal of the ILP was to "facilitate and encourage cooperation and involvement of as many interested stakeholders as early as possible". The many meetings conducted by APCO have been well publicized and well attended. Stakeholders have been afforded opportunities to address their concerns before, during and after those meetings. As stated above, LMRA has not always agreed with the results of those meetings. For example, during discussions of the economic impact study associated with Study Plan 12(g), it became evident that LMRA viewed the economic reach of Lake Martin much more broadly than APCO's planned economic impact study. LRMA felt that a more comprehensive economic impact study would more accurately demonstrate the positive economic impact of increasing the lake levels during the Spring and Fall. After several meetings and much negotiation, APCO decided to use its original plan for the economic impact study, potentially putting at risk LMRA's proposals for higher lake levels in the Spring and Fall. LMRA's response to this was to assemble a coalition of private and public entities to fund the completion of an economic impact study according to LMRA's original recommendations. The results of this economic impact study were filed with FERC on January 19, 2010. While LMRA and APCO disagreed on the ultimate manner in which the economic impact study would be conducted, LMRA was afforded multiple opportunities to present its views on this issue. Throughout the ILP, other stakeholders were afforded similar opportunities. It seems to us that the primary goal of the ILP as referenced above has been satisfied.

One issue mentioned in the Complaining Group's February 25, 2011 letter is the Multi-Criteria Decision Analysis ("MCDA") process. LMRA disagrees that there has been a "breakdown in the process" or a "collapse of the Multi-Criteria Decision Analysis (MCDA) process". LMRA does not find it surprising that a significant number of stakeholders might be in "absolute opposition" to the results of such an analysis. In a process that evaluates 24 alternatives proposed by stakeholders with varied interests, it is logical to expect substantial disagreement if every stakeholder's suggestions aren't completely supported. For example, LMRA and HOBO agreed on the desirability of higher winter pool levels and an earlier Spring fill with longer full pool elevation in the Fall, the so-called "shoulder" periods. LMRA and HOBO attached different priorities to these objectives but both organizations expressed support for higher winter pool elevations and extension of the shoulder periods. The MCDA showed that the early Spring fill was not rated highly enough to be a likely recommendation in the final license application, thereby satisfying one of the downstream landowners group's objectives of opposing the early Spring fill. Neither LMRA nor HOBO was particularly happy about this result, but

we unquestionably had ample opportunities to express our positions. Even though all of LMRA's and HOBOS objectives were not completely supported by the MCDA, a significant part of those objectives were supported. Likewise, at least one of the downstream landowners group's objectives, opposition to the early Spring fill, was satisfied through the MCDA.

The results of the MCDA will naturally appear to be somewhat "homogenized" when the MCDA must balance so many competing stakeholder positions. LMRA believes its members will benefit from the recommendations that did receive support in the MCDA. We also believe our requests for Additional Measures to Protect Maintain or Enhance ("PM&E") (filed with FERC on December 6, 2010) will also be considered in the same manner as our input on other issues during the ILP. Time will tell if we agree with the results but our recommendations are being considered and studied.

The Complaining Group has requested that another meeting be scheduled so that they can "chart our way through the remainder of the relicensing process". LMRA believes that further meetings are unnecessary and will be counterproductive to the ILP. All stakeholders have the opportunity to address the Preliminary License Proposal ("PLP") by filing comments with FERC. The PM&E process is also available for stakeholders that feel they have worthwhile suggestions.

In summary, LMRA did not get everything it wanted in the results of the MCDA but our positions and concerns were heard and addressed by APCO, even if they weren't completely adopted in the PLP. To characterize the process as "broken" or "collapsed" appears to be primarily a complaint about results, not the process.

Very truly yours,



J. Charles Borden
President



Steve R. Forehand
Legal Officer