

January 21, 2008

Martin Project Relicensing

Draft Study Plans

from Lake Martin Home Owners & Boat Owners Association

General Comments

The Lake Marin HOBO's appreciate Alabama Power Company's recognition of our organization as concerned stakeholders who are eager to continue to participate in the relicensing process. We understand the mission and it is our intent to offer suggestions on what we believe will make our shared mission more successful.

We share many of the concerns already submitted by the Alabama Rivers Alliance. Among them is our disappointment that several of the issues identified in the issue sheets from July 2007 have not been incorporated into the study plan. We request that APCO document the decision process used to eliminate initial issues from further study. We join ARA in encouraging you to review the initial issues raised in 2007 to ensure that they aren't ignored for further study without documentation of stakeholder consensus.

APCO has provided much of the relicensing information on a website. We join the Alliance in requesting that electronic copies of the documents and studies referenced in the study plans be placed on the relicensing website.

The Lake Martin HOBO's also request that APCO post copies of comments filed by stakeholders on the relicensing website. This will enable all stakeholders to more fully understand the various positions and issues of all relicensing participants. Full copies of the stakeholder comments on the website could supplement any summary documents APCO prepares.

Each study plan includes an estimate of cost. However, it is unclear what is included in these costs. Please revise the study plans to include a more detailed explanation of the cost estimate with subcategories such as subcontractor personnel, APC personnel, equipment costs/rental, supplies, and lab analysis.

MIG 2 - Water Quality & Quantity

The Lake Martin HOBO's also take this opportunity to join the Alliance in mentioning that many stakeholders have expressed interest in the development of a basin-wide model for water movement and impacts for the Alabama Power projects on the Tallapoosa River, which include Harris, Martin, Yates, and Thurlow dams. We understand that the

We realize that the three other dams are not being relicensed at this time, yet many stakeholders have expressed interest in learning how these projects and APCO's operations interrelate. We understand that APCO undertook this sort of modeling during the relicensing of the seven Coosa River projects (P-2146). In APCO's presentation in May 2007 they confirmed their understanding that "the operations of each dam have an impact on both upstream and downstream reservoirs."

Study Plan 1 – Adaptive Management Water Quality

Although we are aware that a temporary rule curve variance was permitted by FERC during the drought in 2007, we are unaware of any official proposal to permanently alter the rule curve at the Martin reservoir. The study plan indicates that a rule curve change is an assured alternative. The Lake Martin HOBOS take this opportunity to reinforce our desire for an adaptive management approach concerning a rule curve change. APCO mentions the rule curve as an operational nexus. The use of a minimum flow release is also an operational nexus that should be studied. Even though operational changes have not been proposed at this point, APCO should consider how a minimum flow would improve water quality in the reservoir and downstream of the dam.

Study Plan 4 – Water Quantity, Water Use, and Water Withdrawals

The project nexus needs to include areas beyond the project boundaries. Upstream water usage greatly affects the water availability in the Martin project. The Lake Martin HOBOS share the concern expressed by the Alliance. The potential for new reservoirs in Georgia, water use trends related to population growth, and any other potential future use of water must be documented and considered in this relicensing process. We request that APCO work with local municipalities to utilize existing census data and water usage information and estimate potential domestic water demand in the area for the next 30-50 years. The proximity of the Tallapoosa River headwaters to Atlanta makes the possibility of a new water storage reservoir or major water withdrawal a real threat to water supply in the Tallapoosa basin. APCO should consider the potential future plans of upstream entities for use of the water (18CFR5.6(d)(3)). Other existing water users within the basin upstream of the dam should be included in the white paper. APCO should also document how operations of the Martin project may affect water availability and increase evaporation.

MIG 4 – Shoreline Management

The Lake Martin HOBOS are already actively engaged with the Lake Martin Area Economic Development Alliance in formulating a proposal to elected officials in the cities and three counties having shoreline on Lake Martin that would better protect non-project lake boundary lands from unrestricted development. The HOBOS share the concern expressed by the Alabama Rivers Alliance that APCO plans only to analyze APCO-owned lands in the Shoreline Management Plan. While we understand the APCO has no control over the development of lands not under its ownership, knowledge of the

current land uses, growth trends, and non-point source pollution impacts would be a great help to resource agencies, land owners, and other stakeholders. The Alliance requests that APCO include a process to develop a landowner, land developer, and realtor education program that focus on sustainable development and proper best management practices in an effort to protect the resources in the vicinity of the project. We also request that APCO work with stakeholders to determine if land needs to be added to the project boundary that would result in the improvement of water quality or fish and wildlife habitat. In addition, we suggest that APCO work with local residents, developers, and municipal leaders in planning a workshop to discuss community planning and development ordinances in the area of the reservoir.

MIG 5 – Recreation

The drought of 2007 has brought stark reminders of the hazards that lie below normal winter water levels. This drought has already extended into 2008 and long-range weather forecasts offer no real hope of a change to this drought trend. Officials from the state of Georgia are already dusting off their plans to build additional reservoirs. When one or more of the proposed reservoirs are built on the upstream waters that flow into the rivers and streams that feed Lake Martin there will be increased stresses placed on our lake's water levels.

The public citizens who utilize the lake for recreational boating must be better protected from injury, death, or personal property damages due to unnaturally low water levels. The Lake Martin HOBOS propose that APCO work closely with the Alabama Marine Police to develop and publish well defined guidelines for marking hazards that reflect the proposition that periods of low lake levels will most likely increase. We also recommend that APCO use the same mode as used on its other reservoirs in Alabama. Specifically, APCO should purchase and stock hazard markers and their anchoring devices and then work with the Alabama Marine Police and volunteers to place the hazard buoys.

The owners of businesses on or near Lake Martin have suffered significant economic hardship and loss. If the drought period extends as is forecast some will be forced to close their businesses. In the 1990's some Auburn University professors conducted and published a study of the economic impact of Lake Martin. Since that time there has been explosive growth in lake property ownership and recreational users of the lake. The Lake Martin HOBOS propose that APCO commission an updated study and consider its findings to offer additional support for changing the rule curve during this relicensing process as well as while convening Adaptive Management sessions.

Dave Heinzen

Lake martin Home Owners & Boat Owners Association, Relicensing Chairman

