



January 31, 2008

RE: Martin Project, FERC No. 349

Mr. Jim Crew  
Relicensing Project Manager  
Alabama Power Company  
Birmingham, Alabama 35203

Dear Jim:

As President of the Lake Martin Home Owners and Boat Owners Association, Inc. , and as a member of the HOB0 Relicensing Committee my comments concerning the MIG Study Plans will be restricted to the areas of my concentration and not to the entire project.

### **MIG 3 – Project Operations**

The Plant Operations study plan has a schedule calling for the presentation of result in February 2008, with final adoption in June 2008. The MIG 5 – Study Plan 2 – Socioeconomic Impacts of Rule Curve Change calls consulting with MIG 5 one year after MIG 5 is completed. This extended delay could allow further study under MIG 3.

We propose that an economic impact study be conducted to investigate the impact on the local economies of the three counties surrounding Lake Martin, when the lake level is lowered for reasons outside the rule curve, ie, the lower Alabama River dredging project this past fall.

There should be a joint MIG study of #3 and #5 to explore the rule curve options available and economic impact of each option. Establishing a higher winter lake level without data from MIG 5 – Study Plan 2 seems ill advised. The Rule Curve and the winter lake level are interrelated issues and should be studied together.

The Project Operations study plan is a study conducted by Alabama Power Company personnel without involvement of the public. When the presentation of the results is made all supporting data should be available. It would be helpful to MIG members for APCo to furnish copies of the similar study completed for Lake Logan Martin and Lake Weiss.

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*P.O. Box 1030  
Dadeville, Alabama 36853-1030*

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## **MIG 5 – Recreation**

The socioeconomic impact of the Lake Martin of a Rule Curve change will certainly be dramatic. The use of the FIMS study will provide an 11 year old version of the impact of a Rule Curve change at that time. In 2008, there are over 7,800 parcels of lake front property, many more full time residents, more affluent owners, and more businesses dependent on a healthy lake level. In addition to updating the FIMS study for inflation, etc., new data must be assimilated into a comprehensive study that reflects the actual lake economy.

A portion of this study should be dedicated to lessons learned from a reduced lake level. Lake Martin was artificially lowered at least three feet to support a dredging activity from September 28 through November 8, 2007. The economic impact study should include the impact during the drawdown and the extended time required for the lake to recover. A study of the effects of the low lake levels in 2007 must be incorporated into the study to show the negative effects of lower lake levels, regardless of the time of the year.

MIG participants should be included in the compilation of data where possible and the process of the study made open to all members.

Sincerely,

Jesse M. Cunningham  
President  
Lake Martin HOBO