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February 18, 2010



FILED ELECTRONICALLY

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 1st Street NE
Washington, DC 20426

RE: Alabama Power Response to Comments on Initial Study Report and Meeting Summary for the Martin Dam Hydroelectric Project (FERC No. 349-150)

Dear Ms. Bose,

Pursuant to 18 C.F.R. Section 5.15(c) (5), Alabama Power Company (Alabama Power) herein provides its response to the comments provided by the Federal Energy Regulatory Commission (FERC), various state and federal resource agencies, and other Martin Dam Project stakeholders concerning Alabama Power's November 20, 2009 Initial Study Report and its December 18, 2009 Initial Study Report Meeting Summary. This response is contained in the enclosed Attachment A and Attachment B.

Attachment A contains Alabama Power's response to all commenters except for the Lake Martin Resource Association (LMRA). Because of the level of detail required to respond to LMRA's comments regarding the Robert Charles Lesser & Co. ("RCLCO") study/analysis of the economic impact of Lake Martin, Alabama Power has addressed those comments in a separate Attachment B. In Attachment A, we have responded first to general comments from stakeholders, followed by stakeholder comments by Study Plan. Due to the length of some of the comments, Alabama Power paraphrased comments that exceeded two or more paragraphs. We did not include comments from stakeholders that agree with the Initial Study Report and/or Meeting Summary.

Additionally, Alabama Power would also like to address three matters regarding the Integrated Licensing Process (ILP) for Martin. First, we note that many of the commenting entities focused on adding to or otherwise modifying the study methods and geographic scope of the Study Plan. FERC's Study Approval Process, which involves considerable stakeholder input, provides for the modification and approval of these aspects of the Study Plan early in the process to ensure that FERC has the information it needs to conduct a thorough analysis but also to ensure that the licensee and stakeholders are not endlessly debating study methods and scope. FERC approved 22 study plans on April 17, 2009, and there were no disputes resulting from FERC's Study Determination. Therefore, comments concerning modifications to the Study Plan are not relevant in the context of stakeholder responses to the Initial Study Report or the Study Report Meeting Summary.

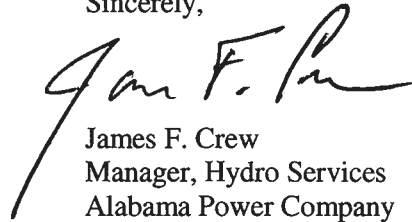
Second, we note that some stakeholders seem to believe that Alabama Power is not sharing information regarding the relicensing studies. This perception is not supported by the record of this proceeding. Alabama Power has held numerous meetings and workshops to share information (see Attachment C for a list of meetings). For example, Alabama Power has held two

intensive workshops on the operational models during which we shared substantial information concerning reservoir operations, downstream flows and other technical matters. Though we have already provided substantial information, there is, of course, much more information to be provided in the future when draft study reports are available. Stakeholders should revisit the study plans to educate themselves on the schedule for Alabama Power distributing draft study reports for each of the studies. We also wish to clarify that Martin Issue Group (MIG) meetings were held in 2007, 2008, and 2009, contrary to what some stakeholders have asserted.

Finally, higher water conditions in late 2009 and early 2010 have impacted collection of some limited data. Alabama Power intends to collect any data that was unavailable due to high water levels in fall/winter 2010 and distribute that information with our Preliminary Licensing Proposal and/or Final License Application.

Alabama Power appreciates the opportunity to respond to the comments provided on the Martin Initial Study Report and Meeting Summary. If you have any questions, please contact me at 205-257-4265 or JFCREW@southernco.com.

Sincerely,



James F. Crew
Manager, Hydro Services
Alabama Power Company

Cc(w/attachments): Mr. Mark Pawlowski, FERC
Mr. Lee Emery, FERC

Attachment A
Attachment B
Attachment C

ATTACHMENT A

General Comments

2010-01-14 ADCNR-FS Comments on Modifications to the Initial Study Report

Comment:

Many of the Martin studies were delayed in 2009 due the extremely high water levels on the Tallapoosa River. In the event that high water is again a problem in 2010, we ask that these studies still be conducted at some point in the future. We feel these studies are of significant importance and should be accomplished whenever feasible regardless of relicensing time restraints.

Response:

We agree that the high water in 2009 prohibited collecting some data. Alabama Power plans to complete the study plan sampling in 2010, as approved by FERC.

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

From the information provided to date, the unusual weather, the resulting modifications to project operations, and the subsequent changes to water quality and flow patterns within the reservoir and in the Tallapoosa River in the Martin tailwater and possibly downstream of Thurlow Dam. These circumstances potentially affected the results of many, if not all studies skewing their results of from what would be expected in a "typical" year. APC will need to look closely at the field data collected in 2009 to ensure that studied resources are not being affected by the unusual weather conditions, and certainly, not represent any data collected in 2009 as representative of a "normal" year. Specifically, the behavior of many animals is directly affected by weather (as well as other conditions) and may make species more or less susceptible to capture or sighting.

Response:

Alabama Power will consider hydrologic conditions when analyzing the data collected in 2009. In addition, Alabama Power has planned additional sampling in 2010, where necessary, to complete the study.

Comment:

Given that data collected across a number of field seasons will lead to better determination of project impacts coupled with the unusual weather during almost the entire 2009 study period, WWF recommends APC conduct the same studies with the same or improved methodologies during 2010 (and perhaps beyond 2010).

Response:

Alabama Power will consider hydrologic conditions when analyzing the data collected in 2009. In addition, Alabama Power has planned additional sampling in 2010, where necessary, to complete the study. These plans include Study Plans 5, 10, 12(d), and 12(e). Study Plans 2, 4, and 8 were already approved (via FERC in April 2009) to have collections occur in 2010.

Comment:

The Integrated Relicensing Process (ILP) is a relicensing process that should be inclusive of all stakeholders. Regrettably, many of the studies have been developed or even conducted without input from the involvement of the respective Martin Interest Groups (MIG). For example, the MIG group related to Fish and Wildlife (MIG 1) has not met since September 2007. Meeting only once does not foster a spirit of inclusiveness underpinning the ILP process. Also, at the December 3, 2009 study plan progress report meeting, the Lake Martin Home Owners & Boat Owners Association (HOBO) made several salient points on not being included in the development and implementation of the studies affecting recreation and economics. The ILP is a relicensing process that should be inclusive of all stakeholders. Regrettably, many of the studies, including these, have been developed or even conducted without input or with very limited input of the respective MIG members.

We recommend that APC convene MIG groups or ask all members for input to review study progress to date and discuss changes to protocols or study plans. APC should also convene the various MIGs to review study reports and critique APC analysis and discuss resulting conclusions.

Response:

Alabama Power worked with stakeholder groups for two years in the development of the approved study plans. A list of Alabama Power Martin relicensing meetings is provided as Attachment C. In addition, several stakeholder groups (Alabama Water Watch, ADCNR, and USFWS) have participated in the collection of data for various studies.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

The 2009 study season in no way represents conditions that would be expected in a “normal year”. APC must meaningfully take the unusual weather that occurred in 2009 into account to ensure data collected during the 2009 season did not skew study results and does not represent a “normal” flow year.

Response:

Alabama Power will consider hydrologic conditions when analyzing the data collected in 2009. In addition, Alabama Power has planned additional sampling in 2010 where needed for studies, on a case by case basis.

Comment:

In order to inform stakeholders of the direct, cumulative and potential impacts of Martin Project operations and to identify ineffective study techniques, American Rivers recommends APC conduct the same studies during 2010. It is likely that due to climate change over the course of the Martin License (30-50 years) the Tallapoosa Basin will experience increasing extreme or unusual weather in form of drought and flood. It is critical APC collect data over a number of field seasons (2 or more) to better determine project impacts.

Response:

We agree that the high water in 2009 prohibited collecting some data for a limited amount of studies. Alabama Power plans to complete the study plan sampling in 2010, as approved by FERC.

MIG1- Study 1- Migratory Fish- Tallapoosa Literature Review

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

WWF recommends gathering the following information:

1) How Martin flow fluctuations and related water quality impacts affect fish migrations in the waters between the mouth of the Tallapoosa River and Thurlow dam. The presence and operation of the Martin Dam Project, coupled with the Yates and Thurlow hydroelectric projects (both are run of river), could affect the movements of fish populations in the Tallapoosa River directly through project operational flow releases. 2) Impacts of Martin dam and reservoir on movement of stream fishes (e.g., lipstick darter between Hillabee Creek and the Irwin Shoals area of the Tallapoosa River). The presence and operation of the Martin Dam Project, could affect the movements of these fish species and their populations. 3) Impacts of Martin dam and reservoir on mussel distribution (mussel distribution is frequently facilitated by small fish movement during glochidial stage 4) the presence and operation of the Martin Dam Project, could affect the location of mussel individuals and the movements of host fish and their populations.

Response:

Study Plan 1 was not designed to assess project effects on aquatic species. Some of the commenting entity's goals were covered by Study Plan 3. The goal of Study Plan 1 is to develop an information package that the USFWS can use to satisfy their fish passage prescription. Alabama Power will continue to confer with the USFWS regarding fish passage.

Comment:

APC should seek professional opinions from experts at agencies, universities, private sector and the Southeastern Fishes Council in addition to the proposed literature review.

Response:

The FERC approved Study Plan 1 goal is to develop an information package that the USFWS can use to satisfy their fish passage prescription. Alabama Power will continue to confer with the USFWS regarding fish passage.

Comment:

Expand the scope of this study plan to include the river reach below Yates and Thurlow. The presence and operation of the Martin Dam Project, coupled with the Yates and Thurlow hydroelectric projects (both are run of river), could affect the movements of fish populations in the Tallapoosa River directly through project operational flow releases.

Response:

Study Plan 1 was not designed to assess project effects on aquatic species. Some of these goals from the commenting entity were covered by Study Plan 3. The goal of Study Plan 1 is to develop an information package that the USFWS can use to satisfy their fish passage prescription. Alabama Power will continue to confer with the USFWS regarding fish passage.

Comment:

Reach out to the MIG1 stakeholders, even via conference call, to discuss study protocols and progress.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

Study how Martin operations, flow fluctuations due to peaking, and water quality (temperature, DO, turbidity) affect fish migrations in the river reach from the Tallapoosa's confluence with the Coosa to Thurlow Dam.

Response:

Study Plan 1 was not designed to assess project effects on aquatic species. Some of these goals from the commenting entity were covered by Study Plan 3. The goal of Study Plan 1 is to develop an information package that the USFWS can use to satisfy their fish passage prescription. Alabama Power will continue to confer with the USFWS regarding fish passage.

Comment:

Study the impacts of Martin operations on mussel distribution in the Tallapoosa River. Operations could affect the movements of host fish and the location mussel populations.

Response:

Alabama Power has conducted mussel surveys as part of Study Plan 5 and 12(e).

Comment:

Seek professional opinions from experts at agencies, universities, the private sector, and others with relevant expertise in addition to the proposed literature review.

Response:

Alabama Power has worked closely with state and federal agencies and several universities in gathering literature.

Comment:

Reach out to MIG 1 stakeholders to discuss study protocols and progress. The last MIG 1 meeting was held in September 2007.

Response:

American Rivers is incorrect in stating that the last MIG 1 was in 2007 (see Attachment C). As recently as October 21, 2009, Alabama Power hosted a MIG 1 and 2 meeting. Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-15 FERC Comments on Initial Study Report

Comment:

In the Meeting Summary, we note that Judy Takats of the World Wildlife Fund asked when the Martin Issue Group (MIG) 1 members would receive a copy of the information regarding the American eel that was distributed to the resources agencies. Henry Mealing of Kleinschmidt Associates answered the question, stating that raw data would be synthesized into a more reviewable form which would be available in January 2010. We remind Alabama Power that any data or information distributed to resource agencies should also be filed with the Commission and made available for stakeholder review.

Response:

The American eel information was distributed via CD-Rom on January 21, 2010 and will be sent to FERC by February 28, 2010.

MIG1- Study 2- Assessment of Fish Density and Species Composition Associated with Various Shoreline Types

2010-01-18 LMRA Comments on Proposed Study Plans for Martin

Comment:

LMRA is concerned that shoreline modification and protection methods could be limited only to rip rap as a result of the above-referenced comment. LMRA recommends that hard surface seawalls continue to be allowed as a shoreline protection and modification method as long as rip rap is used at the base of the wall. This is a continuation of current allowed shoreline protection and modification methods.

Response:

Alabama Power will use the information from the study to make recommendations on shoreline management practices.

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Use a wider variety of gears (e.g., passive netting such as hoop net or trammel net) to capture fish. Some fish species and some sizes of fish are more or less susceptible to a certain gear type based on their behavior (territorial tend to be more susceptible while benthic species can be less susceptible) or body shape. Fish of various species and sizeclasses have different susceptibility to various collection gears.

Response:

The FERC approved study plan includes professional guidance from the ADCNR fishery biologists and Auburn University technical experts for collection issues.

Comment:

Collect benthic invertebrate in permanently submerged and intermittently submerged substrates associated with each site and from areas immediately offshore of each habitat site in substrates that are exposed in the winter and in substrates that are not exposed in typical winter drawdowns.

Response:

Alabama Power has included the collection of zooplankton and macroinvertebrates; collection sites were determined by Auburn University technical experts.

Comment:

Collect another year of data, especially considering wet summer conditions in 2009.

Response:

The FERC approved methods in Study Plan 2 requires sampling be conducted while the lake is at or near full pool, generally between April through May, of both 2009 and 2010.

Comment:

Reach out to the MIG1 stakeholders, even via conference call, to discuss study protocols and progress.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-15 FERC Comments on Initial Study Report

Comment:

In section 6.2, Data Collection Techniques for Semi-Aquatic Species, of the Clarification of Study Plan 2, Assessment of the Influence of Shoreline Modifications on Aquatic and Semi-Aquatic Species' Use of Various Shoreline Types for the Martin Hydroelectric Project, filed on July 2, 2009, you state that data on the presence of birds and semi-aquatic mammals would be collected as part of the study. However, there is no such data described in the Initial Study Report. We note that all data collected should be summarized in the Initial Study Report so that it is available for Commission and stakeholder review.

Response:

Birds and semi-aquatic mammals are discussed in the “Martin Hydroelectric Project Assessment of the Influence of Shoreline Modifications on Aquatic and Semi-Aquatic Species Use of Modified Areas” Report by Mark Bailey. This report was distributed to MIG members and posted on Martin relicensing website.

Comment:

In the Meeting Summary, we note that Henry Mealing of Kleinschmidt Associates stated that portions of this study were complete and that a CD containing reports of completed studies would be distributed to MIG 1 members in December 2009. We remind Alabama Power that any information distributed to resource agencies should also be filed with the Commission. However, the Commission has not received such a CD. As we state for other studies, information and reports from any study (completed or otherwise) should be made available for Commission and stakeholder review.

Response:

Alabama Power distributed the “Martin Hydroelectric Project Assessment of the Influence of Shoreline Modifications on Aquatic and Semi-Aquatic Species Use of Modified Areas” Report to MIG 1 members and posted the report to the website on December 14. The report will be sent to FERC on or before February 28, 2010.

MIG 1- Study 3- Evaluation of Minimum Flows Downstream of Martin Dam

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Broaden the geographic scope of the study to the USGS Montgomery Water Works gaging station for the same reasons the Commission expanded the scope of the Erosion and Sedimentation study. Constraining the geographic scope of this study to the Martin tailwater area is insufficient as impacts from large and frequent flow fluctuations could impact aquatic animals, water quality, and bank stability along the entire Tallapoosa River downstream of Thurlow as well as in the Martin tailwater.

Response:

Alabama Power is utilizing the geographic scope approved by FERC in Study Plan 3.

Comment:

Investigate whether or not the rate of flow fluctuations (ramp rate) might impair water quality, aquatic animal habitats, or aquatic animals directly (stranding) both in the Martin tailwater and in the Tallapoosa River downstream of Thurlow to the Montgomery Water Works USGS gaging station. This information is important to describe existing and potential continuing impacts of the Project to water quality conditions and populations of aquatic animals in the Project affected area.

Response:

The FERC approved goals and objectives of Study Plan 3 are to evaluate flows under the current operating conditions. Ramping is not a part of the current operating conditions at Martin and was not included in the FERC approved study plan.

Comment:

In addition to the studies offered, we suggest APC add: A Survey for the Gulf Sturgeon in the Mobile and Perdido Basins, Alabama and Studies of Pollution in Streams of Alabama.

Response:

These studies are beyond the geographic scope of the project and will not be included.

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

We agree that the high water in 2009 prohibited collecting some data. Alabama Power plans to complete the study plan sampling, as approved by FERC.

Comment:

Reach out to the MIG1 stakeholders, even via conference call, to discuss study protocols and progress.

Response:

Alabama Power held MIG meetings in October 2009 to provide an update on the MIG 1 studies where stakeholders could ask questions of Alabama Power and/or the researchers. Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

Expand current methodology in Study Plan 3 to include a more robust scientifically accepted instream flow study that includes an analysis of water quality, habitat availability, and habitat quality.

Response:

The current study plan was developed with input from agencies and stakeholders, underwent a comment period through FERC, and subsequently, was approved by FERC in April 2009. The approved goals and objectives of the study are to evaluate the flows in the Tallapoosa River below the Martin Project and the flexibility of Martin operations to influence flows below the Thurlow dam without changes to the existing Thurlow license requirements.

Comment:

Broaden the geographic scope of the study to the USGS Montgomery Water Works gaging station. It is clear that Martin peaking operations could impact aquatic wildlife, habitat, water quality, and bank stability in the Tallapoosa River to its confluence with the Coosa.

Response:

Alabama Power is utilizing the geographic scope identified in the FERC approved study plan.

Comment:

Collect at least another year of data due to the unusual weather conditions in 2009.

Response:

We agree that the high water in 2009 prohibited collecting some data. Alabama Power plans to complete the study plan sampling, as approved by FERC.

Comment:

Reach out to MIG 1 stakeholders to discuss study progress.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

MIG 1- Study 4- Fish Entrainment and Turbine Mortality

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Include intake depths as an important physical characteristic in the database of similar hydroprojects. This database will be used to help derive turbine mortality estimates for the Martin Hydroelectric Project. Intake depth is an important consideration for entrainment and turbine mortality.

Response:

Alabama Power included intake depth in the Fish Entrainment Database in the Fish Entrainment and Turbine Mortality Analysis Report, the paper entrainment portion of which has been distributed to stakeholders.

Comment:

Repeat fish entrainment data collection during summer of 2010. APC altered “typical” operations at Martin in reaction to heavy summer rains during 2009. It is possible that the weather conditions or the changed operations altered fish entrainment documented in this study.

Response:

As stated in the study plan, Alabama Power will conduct Field Verification from April 2009 to February 2010.

Comment:

Reach out to the MIG 1 stakeholders, even via conference call, to discuss study protocols and progress.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-15 FERC Comments on Initial Study Report

Comment:

Your proposed modification to Study Plan 4 would result in the draft report being provided by May 2010 instead of April 2010. Because you did not explain why you request the modification to the schedule, as required by the Commission’s regulations, we see no reason why Alabama Power can not adhere to the schedule as approved in the Study Plan Determination.

Response:

Alabama Power will make every attempt to adhere to the schedule approved in the Study Plan Determination.

MIG 1- Study 5- Rare, Threatened and Endangered Species

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Increase the time and effort spent searching for rare and protected aquatic fauna with professionals able to identify rare species and potential habitats. For tributary surveys, looking at several sites (or habitat units) proximal to the reservoir and several sites (or habitat units) more than one mile from reservoir affect would be beneficial. This type of survey will eliminate bias from single sites and will potentially allow APC to identify reservoir effects in tributary streams. For sites in the Tallapoosa River within the Martin Project affected reach, more intensive surveying would provide greater confidence in the absence of protected and rare species.

Response:

The USFWS provided input on the methodology included in Study Plan 5 and Alabama Power will follow the methodology stated in the FERC approved Study Plan 5. The USFWS participated in several of the RTE collections.

Comment:

Sampling locations in 2010 should be expanded to several sites in each tributary and more sites in the Tallapoosa River downstream of Thurlow at least as far as the USGS Montgomery Water Works gaging station.

Response:

The FERC approved Study Plan 5 includes survey sites specified by the ADCNR and USFWS for all streams on Martin Reservoir. Study Plan 12(e) includes surveys downstream of Thurlow Dam.

Comment:

Sampling should be conducted during at least two seasons (summer and fall) to incorporate the entire life cycle of species and to lessen the chances of poor visibility and animal behavior influencing sampling.

Response:

The FERC approved Study Plan 5 specifies that if the presence of RTE species or “high quality” habitat for RTE species is detected during the qualitative surveys, a follow-up survey in 2010 may be recommended by the USFWS.

Comment:

Incorporate surveys for host fish in areas where mussels are found.

Response:

As stated in the FERC approved study plan, each site will be surveyed for fish, mussels, and snails at or slightly upstream of the summer pool elevation (491 msl).

Comment:

Investigate the potential for the Project and Project operations to affect those fish species that are important to the life cycle of target mussel species.

Response:

Alabama Power will consider fish species when analyzing any results.

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

The FERC approved Study Plan 5 specifies that if the presence of RTE species or “high quality” habitat for RTE species is detected during the qualitative surveys, a follow-up survey in 2010 may be recommended by the USFWS.

Comment:

Conduct transects for the Georgia Rockcross throughout the potential habitat. It seems that the survey relies just on one transect.

Response:

Alabama Power is currently working with Dr. Whetstone to ensure adequate surveys are conducted as listed in the approved study plan. Alabama Power will distribute an additional report to MIG 1 members when the surveys are completed.

Comment:

Present the findings of this study from members of MIG1 and gathering their opinions prior to the release of the draft report.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

Increase the time and effort spent searching for RT&E species with professionals familiar and able to identify rare species and habitats.

Response:

The USFWS provided input on the methodology included in Study Plan 5. Alabama Power will follow the methodology in the approved study plan. The USFWS participated in several of the RTE collections.

Comment:

Conduct sampling during at least two seasons to incorporate the entire life cycles of species and to lessen the chances abnormal flow conditions.

Response:

The FERC approved Study Plan 5 specifies that if the presence of RTE species or “high quality” habitat for RTE species is detected during the qualitative surveys, a follow-up survey in 2010 may be recommended by the USFWS.

Comment:

Include surveys for host fish in areas where mussels are present.

Response:

Alabama Power will consider fish species when analyzing any results.

Comment:

Reach out to MIG 1 members to keep up to date with study plan progress.

Response:

Alabama Power will host MIG 1 meetings to discuss data throughout 2010.

2010-01-15 FERC Comments on Initial Study Report

Comment:

We see no reason why the results of other portions of the studies which have already been completed, such as the Lake Martin Vegetation Report, could not be distributed in draft and final reports as approved in the Director’s Study Plan Determination.

Response:

Alabama Power distributed the Lake Martin Vegetation Report to MIG 1 members and posted the report to the website on December 14. The report will be sent to FERC on or before February 28, 2010.

Comment:

In the Initial Study Report, you provide a summary of the field surveys in which you list some basic results of the survey for Study Plan 5. However, the summary of the field surveys excludes a complete list of all sites sampled during 2009, and sites that remain to be sampled during the spring of 2010.

Response:

This list FERC refers to was presented by Alabama Power at the October 21, 2009 meeting. Alabama Power will distribute an electronic version the Study Plan 5 Collection Results Tables to MIG 1 members and FERC on or before February 28, 2010.

Comment:

For Study Plan 5 you also state that for the federally threatened plant, little amphianthus, no habitat was found in recent or prior surveys conducted in the vicinity of Lake Martin. For the candidate species Georgia rockcress, you state that no individuals were observed at any of the sites investigated. However, the methodology that was outlined in the approved study plan for these two terrestrial plant species of concern includes the use of LIDAR data, topography, and

soil maps to locate suitable habitat within the project boundary, followed by presence-absence surveys conducted in any suitable habitat area. Because the information presented in the Initial Study Report is limited, it remains unclear whether all steps of the methodology were followed for either species. Further, you do not report the locations, if any, of any suitable habitat, the number of sites surveyed, or other pertinent information regarding these two plant species. We note that complete and detailed reports should be available for Commission and stakeholder review.

Response:

Alabama Power is currently working with Dr. Whetstone to ensure adequate surveys are conducted as listed in the approved study plan. Alabama Power will distribute an additional report to the MIG 1 members when the surveys are completed.

MIG 1- Study 6- Striped Bass Telemetry Study

2010-01-15 ADCNR-FS Comments on Modifications to the Initial Study Report

Comment:

In relation to Study Plan 6: Striped Bass Telemetry Study, the ADCNR-FS would like to propose an addition. We are in the process of requesting Sport Fish Restoration funds that would allow us to continue a second year of the striped bass telemetry study through Auburn University in 2010. We suggest that any data collected during this additional study year be used to supplement the data collected during year one.

Response:

Alabama Power will support the ADCNR-FS in the second study season (i.e. providing equipment). Information gathered by the ADCNR by August 2010 will be incorporated into Alabama Power's Final Report due September 2010.

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

As noted above, the ADCNR-FS plans to collect additional data in 2010.

Comment:

Present the findings of this study from members of MIG1 and gathering their opinions prior to the release of any draft report.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

MIG1- Study 7- Wildlife Management Plan

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Include wildlife and vegetation inventories in the methodology. These inventories are integral components to the development of a wildlife management plan and were missing from the methodology. Incorporate up to date information on vegetation and wildlife use, by season, in the study plan. Inventory methods should include surveys in several different seasons so as not to bias the results against animals that visit the area only during a part of the year.

Response:

The general goal of the Wildlife Management Plan is to manage existing habitat and to enhance it for specific wildlife species. Therefore, surveys have focused on current available habitats. The Wildlife Management Plan will focus on how to shift or manage current available habitat for ADCNR wildlife goals, with emphasis on longleaf pine stands. Recent vegetation surveys were collected in 2009 to document understory and ground cover for various forest types.

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

Hydrologic conditions did not affect collection of forest data.

Comment:

Survey 3-5 sites within each vegetation type, not just the one as represented in the study report.

Response:

FERC approved the study methods which included Dr. David Whetstone's collection techniques and methods. The ADCNR provided some guidance for collection of the data.

Comment:

Present the findings of this study from members of MIG 1 and gathering their opinions prior to the release of any draft report.

Response:

Alabama Power intends to hold several MIG 1 meetings in 2010 to discuss data.

2010-01-15 FERC Comments on Initial Study Report

Comment:

In the Initial Study Report for Study Plan 7, you state that you have compiled and distributed historic forest data to the Alabama Department of Conservation and Natural Resources and the U.S. Fish & Wildlife Service. In our letter issued on October 3, 2008, which enclosed Requests for Additional Information, and during the Study Plan Meeting, we requested that Alabama Power provide us with forest composition and structure data. To date, we have not received this

data from Alabama Power. We remind Alabama Power that any data distributed to resource agencies also should be filed with the Commission.

Response:

The ARC-GIS data set that Alabama Power is using for Study Plan 7 is extremely large and has been provided to ADCNR on an external hard drive. If FERC requires this information, it would be necessary to send it in same format (i.e., external hard drive). Please inform Alabama Power how to proceed.

MIG 2 Study 8- Baseline Water Quality

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Widen the scope of this study to the lower reaches of the Tallapoosa River in 2010 such as FERC mandated for the Erosion and Sedimentation study. Martin Project operations, coupled with the operations of Yates and Thurlow, directly affects stream flow and river stages at least to USGS Montgomery Water Works gaging station and likely beyond. Because the project operations affect the river, those operations could also affect the water temperature, dissolved oxygen, pH, turbidity, bacteria, chlorophyll-a, and nutrient levels downstream. Collecting and presenting information that demonstrates how peaking operations do or do not affect these water quality parameters in the Martin Dam tailwater and as far downstream to the confluence of the Tallapoosa River to the Coosa River. Martin Project operations directly affect stream flow and river stages at least to USGS Montgomery Water Works gaging station and likely beyond.

Response:

Thurlow currently has a valid 401 permit that will remain in place whether the operations at Martin change or not. The effects of a rule curve change on water quality will be analyzed in Study Plan 12(c). Alabama Power will analyze the information currently available regarding water quality in the Martin Reservoir and tailwater, as approved by FERC in April 2009.

Comment:

Collect and present data during periods of generation and non-generation (and during rising, peak, falling, and minimum flows in the Tallapoosa downstream of Thurlow). These data may not be necessary for Clean Water Act 401 certification purposes, but are important to describe baseline water quality conditions as required by 18CFR § 4.51 (2) (ii)9. APC should inform stakeholders and the Commission of what the dissolved oxygen concentrations are in the tailwater and other project affected river reaches downstream during these periods. These data will be important to address any cumulative impacts of the project.

Response:

Water quality data have been collected per requirements of the current 401 Water Quality Certification at Martin and as part of the Thurlow FERC license. All data collected below Thurlow is during generation because of the minimum flow requirement. Alabama Power will provide water quality information downstream of Thurlow as part of the report for Study Plan 12(c).

Comment:

Collect and report existing water quality information in the Tallapoosa River downstream of Thurlow Dam at least to river mile 14 (the USGS Montgomery Water Works gaging station). APC analyses of these data should assess what, if any, impact flow level and river stage might have on important water quality parameters like temperature, dissolved oxygen, and turbidity. This sort of water quality versus flow analysis should be completed for several different time periods, especially those important for fish migrations or fish and mussel reproductive periods. Water quality and quantity both play a strong role in cuing fish for migrating and spawning and

is likewise essential for the survival of eggs and juvenile organisms. This information will be also useful for the migratory fish study and for the series of studies related to changing operations.

Response:

In addition to the water quality data that Alabama Power has collected downstream of Thurlow dam, Alabama Power will determine if other sources of water quality data might be useful in describing downstream water quality. Alabama Power plans to consolidate that information, if appropriate, with existing data for the FERC approved Study Plan 12(c) Final Report.

Comment:

Collect and report water quality data that summaries, for the reservoir sites, depth profiles for each month (for information collected at a series of depths from a single site) and employ box and whisker plots to describe longer term, surface water quality conditions (one plot per site) like water temperature, dissolved oxygen, pH, turbidity, bacteria, chlorophyll-a, and nutrients. Box and whisker plots are particularly useful to show the distribution of data for a given parameter as they visually present mean, upper and lower quartile, range, and outlier data points. Multiple plots can be shown on a given figure so that water quality conditions along a gradient (e.g., a river, a reservoir, longitudinally along an embayment) can be shown together making trends in data more apparent.

Response:

Alabama Power will include those portions of the data requested by ADEM and listed in the FERC approved study plan to describe baseline water quality.

Comment:

Present the findings of this study from members of MIG1 and gathering their opinions prior to the release of any draft report.

Response:

Alabama Power intends to hold several MIG 2 meetings in 2010 to discuss data.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

Expand the geographic scope of the study to the Montgomery Water Works Station

Response:

FERC approved the geographic scope of this study plan on April 17, 2009. Alabama Power is utilizing this approved geographic scope.

Comment:

Study, collect, and present information that demonstrates how peaking operations do or do not affect water quality in the Tallapoosa River downstream to the Montgomery Water Works Station.

Response:

FERC approved the geographic scope of this study plan on April 17, 2009. Alabama Power is utilizing this approved geographic scope.

Comment:

Collect and report existing water quality information in the Tallapoosa River downstream of Thurlow Dam to the Montgomery Water Works Station.

Response:

In addition to the water quality data that Alabama Power has collected downstream of Thurlow dam, Alabama Power will determine if other sources of water quality data might be useful in describing downstream water quality. Alabama Power plans to consolidate that information, if appropriate, with existing data for the FERC approved Study Plan 12(c) Final Report.

Comment:

Present findings of this study to Members of MIG 1 and solicit their opinions prior to release of the draft report.

Response:

Alabama Power intends to hold several MIG 2 meetings in 2010 to discuss data.

MIG 2- Study 10- Erosion and Sedimentation

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Describe (thoroughly) APC's own search for erosion hotspots. While it is reasonable (and advisable) to use stakeholder input and known sites as monitoring locations, APC should perform a thorough search for sites within the impoundment and in the Tallapoosa River downstream of Thurlow to augment the stakeholder list.

Response:

In Study Plan 10, Alabama Power engaged landowners, stakeholders, contractors and those familiar with the lake in order to gather local expertise and knowledge in determining erosion and sedimentation sites around the lake. Alabama Power has received a mostly positive response from stakeholders on this inclusive process.

Comment:

Detail how APC will assess primary erosion causes at each site they examine. Erosion is a natural process and can be caused or exacerbated by factors other than flow or lake level fluctuations. APC's decision framework to ascribe primary causes for erosion at all sites should be objective, repeatable, and reproducible.

Response:

Alabama Power will utilize qualified personnel to perform the surveys. Our experience conducting erosion surveys on the Warrior, Coosa and the lower Tallapoosa Rivers gives us a unique perspective and relevant experience for this analysis.

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

Evaluation of baseline erosion sites in Study Plan 10 weren't affected by high water levels.

Comment:

Present the findings of this study from members of the appropriate MIG group and gathering their opinions prior to the release of any draft report.

Response:

Alabama Power intends to hold several MIG 2 meetings in 2010 to discuss data.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

Thoroughly search the Tallapoosa River downstream to river mile 12.9 for erosion hotspots and provide a description of their methodology and reasoning.

Response:

Alabama Power is addressing effects on erosion downstream of Thurlow as a result of a rule curve change per Study Plan 12(d).

Comment:

Detail how they will assess the causes of erosion at each site they examine.

Response:

The Data Sheet and Methodology described in the FERC approved Study Plan 10 detail the erosion/sedimentation analysis.

Comment:

Collect at least one more year of data due high water conditions in 2009.

Response:

Evaluation of baseline erosion sites in Study Plan 10 weren't affected by high water levels

2010-01-15 FERC Comments on Initial Study Report

Comment:

In the Meeting Summary, you indicate that you have identified up to 10 more erosion sites located between the Highway 29 Bridge and the Montgomery Water Works as part of your ongoing work for Study Plan 12(D). However, it is unclear whether you plan to incorporate these erosion sites into Study Plan 10. The specific locations of these additional 10 erosion sites should be identified and we recommend that they be incorporated into Study Plan 10.

Response:

Study Plan 10 analyzes erosion sites on the lake only. We worked with stakeholders to identify each site on the lake that was investigated.

Study Plan 12(d) incorporates existing downstream erosion information and monitoring transects from the Thurlow license requirements with other information that Alabama Power deems necessary which may include “up to 10 additional sites”. Evaluations for Study Plan 12(d) have been delayed by high water and data collections will occur in 2010.

MIG 2- Study 11- Water Quantity, Water Use, and Water Withdrawals

2010-01-18 Central Elmore Water and Sewer Authority's Response to the Initial Study Meeting Summary for Martin

Comment:

CEW&SA reserves the right to comment as information becomes available.

Response:

Alabama Power will distribute the draft report in February 2010 and CEW&SA may submit comments to Alabama Power at that time.

MIG 3- Rule Curve Change - Study Plans 12 (a) – 12 (h)

2010-01-18 Farmer and Downstream Landowners

Comment:

...have strong objections to the Alabama Power Company's "Study Plan and Proposed Modifications numbers 12a through 12 h," also referred to as "MIG-3." ...Twice during the crop growing season in 2003, the Alabama Power Company operated Martin Dam with total disregard of any obligations of flood control.

Request that FERC:

1. Impose upon the Alabama Power Company the unequivocal duty to operate Martin Dam with flood control responsibilities for downriver owners and farmers.
2. Reject and not approve the Company's Study Plan 12(A) (G) and (H), called also MIG-3, which purports, among other things, to:
 - (a) revise the Martin rule curve and operating guidelines to increase the winter pool level by 5 feet;
 - (b) maintain the summer pool level for a longer period of time; and
 - (c) beginning to refill Lake Martin earlier in the winter.

...proposed modifications...will increase flooding potential...downstream....in the winter, spring, summer and fall months...

request that FERC not allow APC to control the level of Martin as it "...creates a prima facie conflict of interest in the Company."

Response:

FERC approved the Study Plans (12(a), (g), (h) on April 17, 2009. Alabama Power is proceeding with the FERC approved study plan for Study 12 (a), 12(g) and 12(h).

2010-01-18 Lake Martin Home Owners and Boat Owners (LMHOBO)

Comment:

The HOBOs request that a more open analysis of flood modeling be conducted as promised by Alabama Power (APCo) in earlier meetings. Meetings thus far have consisted of slide presentations of one Corps of Engineers suggested model. The HEC-ResSim modeling used to date does not account for seasonal fluctuations in rainfall and will not give an accurate prediction of flood potentials. APCo has prepared a monthly flood analysis that should be used by FERC when evaluating the potential flood handling capabilities of the lake.

Response:

Alabama Power is not aware of a method/process that would be more "open" for stakeholders, especially those with limited experience with modeling. Alabama Power is following the methodology outlined in Study Plan 12(a) and approved by FERC in April 2009. Alabama Power held two modeling workshops in 2009 for stakeholders to specifically review, discuss and answer questions about the models and model output. Alabama Power will host a 3rd modeling workshop in spring 2010.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

APC has reported little progress on study plans 12(a)-12(f) because results are contingent on the completion of operations model exercise. In order for stakeholders to better understand inputs, scenarios, and assumptions in the model APC must make the model available either online or on a CD to all interested stakeholders.

Response:

Alabama Power intends to host a third technical workshop in spring 2010 for stakeholders interested in learning more about the modeling results. Alabama Power will make available the Alabama Power Project Routing Model and the HEC-RAS models after distribution of the Draft 12 (a) report. The models will be made available strictly to facilitate stakeholder review of the Draft report and not to propose changes to the model methods, assumptions and inputs, which have already been reviewed and discussed in the 2009 Modeling Workshops.

2010-01-15 FERC Comments on Initial Study Report

Comment:

I approve the revised date for the draft report for Study Plan 12(a) but remind you that the May 2010 date remains firm for completing the final report for Study Plan 12(a).

Response:

Alabama Power appreciates FERC's consideration of this request and will meet the Final Study report deadline of May 2010.

MIG 3 – Study Plan 12(b) – Effects of a Rule Curve Change on Sedimentation Rates and Nuisance Aquatic Vegetation

2010-01-15 FERC Comments on Initial Study Report

Comment:

In the Revised Study Plan approved by the Director, you indicate that for Study Plan 12(B) you would use LIDAR data collected in 2007, in addition to data regarding soil types and land uses, to complete the GIS analysis portion of the study. In your Initial Study Report, you do not provide any other explanation for your requested schedule modification. Therefore, this study should proceed as scheduled.

Response:

Alabama Power will make every attempt to adhere to the schedule approved in the Study Plan Determination.

MIG 3- Study Plan 12(c) – Effects of a Rule Curve Change on Water Quality

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

APC reported no progress on this study during the October 21, 2009 update meeting and limited progress at the December 3, 2009 progress meeting. However, results for the “12 series” of studies must await completion of the operational modeling exercise. It seems that water quality modeling is the only way to develop quantitative estimates of prospective water quality, yet APC is not proposing to model water quality. This existing study on water quality under proposed alternate operations is constrained solely to reservoir conditions; however, the proposed operations will have complicated interactions with water quality. Moreover, APC has not offered an alternative analytic tool aside from ascribing a probability that water quality may change. This tool does not seem to be a very robust for analysis; nor is it transparent to relicensing stakeholders. WWF remains very unclear about how APC will analyze the effects of alternative operational changes (reducing the amount of winter drawdown, reaching summer lake levels earlier in the spring, and extending summer lake levels longer into the fall) to water quality both in the reservoir and in the Tallapoosa River downstream of the Project.

In modeling workshops, WWF staff and others asked specifically if the model is forward looking. APC’s response was “no”. We cannot understand how FERC will, relying solely on this model, analyze those scenarios that are determined to be reasonably foreseeable.

Response:

Alabama Power is following the April 17, 2009 FERC approved study plan. Consistent with Study Plan 12(c) methodology, Alabama Power plans to use a panel of internal and external experts to discuss potential impacts of water quality as a result of a rule curve change (see response below).

Comment:

Detail how water quality changes under alternative operations are determined. If these determinations will be made using “professional opinion”, which seems like the approach based on the study plan, then APC should be clear about who the professionals will be, how they will be introduced to the material, and how their opinions will be gathered (interview, workshop, questionnaire). APC reporting of study results should be detailed enough to capture the reasoning behind the professional opinions to allow stakeholders better understanding of the results.

Response:

Consistent with Study Plan 12(c) methodology, Alabama Power plans to conduct an Expert Panel Discussion in late summer or early fall 2010. The panel will offer their "expert professional opinion" regarding effects on water quality if Alabama Power changes the current rule curve. An agenda will be distributed to MIG 2 and 3 members prior to the discussion.

Comment:

Collect another year of data due to the unusual weather conditions in 2009.

Response:

Alabama Power will consider hydrologic conditions when analyzing the data collected in 2009. In addition, Alabama Power has planned additional sampling in 2010, where necessary, to complete the study.

Comment:

Present the findings of this study from members of MIG 1 and gathering their opinions prior to the release of any draft report.

Response:

Alabama Power intends to hold several MIG 1, 2, and 3 meetings in 2010 to discuss data.

MIG 3 – Study Plan 12(d) Effects of Rule Curve Change on Lake and Downstream Erosion

2010-01-18 WWF Comments on Martin Dec 3 Study Plan Progress Report

Comment:

Evaluate the Tallapoosa River erosion hot spots downstream of Martin dam for exposure to potentially earlier and later extreme peaking events in addition to the potential to experience more frequent flooding events (pending the results of hydrologic modeling in Study Plan 12(a)). Keeping winter pool elevations at higher levels may force larger or longer duration peaking episodes during the period of the year immediately prior to and immediately following the summer pool period since there will be less storage opportunity. APC should be clear in their reporting on how they made determinations about the effects of higher lake levels and attendant operational changes to lake and river erosion hot spots.

Response:

Alabama Power will detail the methodology in the Study Plan 12 (d) report.

2010-01-14 ADCNR – FS

Comment:

Many of the Martin studies were delayed in 2009 due the extremely high water levels on the Tallapoosa River. In the event that high water is again a problem in 2010, we ask that these studies still be conducted at some point in the future. We feel these studies are of significant importance and should be accomplished whenever feasible regardless of relicensing time restraints; this includes Study Plan 12(d).

Response:

Alabama Power will consider hydrologic conditions when analyzing the data collected in 2009. In addition, Alabama Power has planned additional sampling in 2010, where necessary, to complete the study.

2010-01-19 American Rivers Comments on the Martin Initial Study Report

Comment:

During the October 21st, 2009 study update meeting, APC reported some progress on the study by presenting erosion hot spots within the Martin Reservoir. APC made no mention of erosion hotspots in the Tallapoosa River although FERC determined that the geographic scope of this study include up to 10 sites in the Tallapoosa River downstream to river mile 12.9. When asked about the Tallapoosa erosion sites, APC responded that they had somebody who had been studying erosion in the Tallapoosa for years and then quickly moved on to the next study plan update. American Rivers is concerned about APC's commitment to studying erosion sites in the Tallapoosa River, even though FERC determined they do so in the April 17, 2009 study plan determination.

American Rivers recommends APC:

- Thoroughly search the Tallapoosa River downstream to river mile 12.9 for erosion hotspots and provide a description of their methodology and reasoning.
- Detail how they will assess the causes of erosion at each site they examine

- Collect at least one more year of data due high water conditions in 2009

Response:

Alabama Power will continue to follow the Study Plan approved by FERC in 2009. Study Plan 12 D incorporates existing erosion information and monitoring transects from the Thurlow license requirements with other information that Alabama Power deems necessary which may include “up to 10 additional sites” between the Highway 229 and Montgomery Water Works.

MIG 3 – Study Plan 12(e) – Effects of a Rule Curve Change on Federally Threatened and Endangered Species at the Martin Project and in the Tallapoosa River below Thurlow Dam

2010-01-15 FERC

Comment:

In the Initial Study Report for Study Plan 12(E), you state that some sites could not be sampled for mussels and snails during the fall of 2009, because of higher water levels in the tailrace and reservoir, and that those same sites would be sampled during the spring of 2010. You indicate that a list of those sites is available in the Initial Study Report. However, in reviewing the study report we did not find such a list. In addition, the report does not appear to include the list of sites sampled during 2009. We note that information such as the location of sampling sites, the number of sites sampled during 2009, and the number of sites remaining to be sampled, is basic information that should be summarized in the Initial Study Report and made available for Commission and stakeholder review.

Response:

Alabama Power will distribute the Study Plan 5 Collection Results Tables to MIG 1 and MIG 3 members on or before February 28, 2010.

Comment:

Higher water levels prevented the fall 2009 sampling for aquatic RTE species in certain locations for Study Plans 5 and 12(E), as well as prevented the field surveys for Study Plan 10 that would have been conducted from September 2009 to January 2010. While anomalous environmental conditions may affect the sampling schedule for portions of these three studies, we see no reason why the results of other portions of the studies which have already been completed, such as the Lake Martin Vegetation Report, could not be distributed in draft and final reports as approved in the Director's Study Plan Determination.

Response:

Alabama Power distributed the Martin Hydroelectric Project Assessment of the Influence of Shoreline Modifications on Aquatic and Semi-Aquatic Species, Use of Modified Areas Report and the Lake Martin Vegetation Report to MIG members and posted the reports to the website on December 14. The reports will be sent to FERC on or before February 28, 2010.

MIG 3 – Study Plan 12(f) Effects of a Rule Curve Change on Downstream Recreation

2010-10-15 FERC

Comment:

In the Initial Study Report, you indicate that by checking the “no” box, you are requesting a modification to the schedule for Study Plan 12(F). You say this modification is needed to allow the results from Study Plan 12(A) to be distributed and reviewed prior to reviewing the study results for Study Plan 12(F). However, the Meeting Summary has both Study Plan 12(A) and Study Plan 12(F) as being completed on time and within the schedule approved by the Director’s April 17, 2009 letter. We agree that the two studies should be completed according to the schedule approved in the Director’s determination letter.

Response:

In a subsequent response, the FERC approved Alabama Power’s request to delay distributing the draft report for Study Plan 12(A) by one month to February 2010 (Accession # 20100120-3050). Originally, Alabama Power was concerned that delay of the distribution of Study Plan 12(A) would necessitate delaying the distribution of the draft report for Study 12(F). However, based on the comment above, Alabama is preparing to distribute the draft report for Study Plan 12(F) in March 2010, as originally approved by the Commission.

Study Plan 12(g) – Effects of Raising the Winter Pool Level and Increasing the Duration of the Summer Pool on Lake Martin Recreation

2010-01-18 Lake Martin Home Owners and Boat Owners (LMHOBO)

Comment:

The Lake Martin HOBOs submitted comments to Mr. Jim Crew, APCo, on December 9, 2009, (see FERC filing on December 10) about concerns that this study was being conducted without proper input from local stakeholders. Concerns addressed in that letter were met with interesting denials from Mr. Crew in his letter of December 18, 2009 (filed with FERC on December 21, 2009). The Lake Martin HOBOs stand by comments made in the letter of December 9, and invite a review by FERC into the matter.

One of the positive aspects of the Integrated Licensing Process (ILP) is that it should provide stakeholder input throughout the licensing process, not just at the beginning or at the end of the filing. Specifically, the HOBOs feel that all stakeholders should be allowed input on the relicensing process, and that includes input into the conduct of the studies, just as APCo enjoys. It appears that the potential exists for undue influence by APCo and/or its consultants, if the studies are permitted to continue without oversight and input by all stakeholders.

Response:

The LMHOBO assertion that it had no “input into the conduct of the studies” has no merit. Alabama Power has held numerous meetings since early 2007 to work with stakeholders on identifying issues and developing study plans. Attachment C includes a list (not all-inclusive) of meetings held since the January 2007 Issues Identification Workshop for Martin stakeholders. Alabama Power also held a meeting on March 11, 2009 specifically so the LMHOBO, LMRA, and agency representatives could meet and discuss the proposed study plan with Rob Southwick, the contractor responsible for conducting the 12(g) and 12(h) studies. Alabama Power is conducting the studies per FERC approval on April 17, 2009. Alabama Power stands by its response filed on December 21, 2009 (Accession # 20091221-5118).

MIG 3 - Study Plan 12(h) – Effects of Raising Winter Pool Level and Increasing the Duration of Summer Pool on Lake Martin on Economic Indicators

2010-01-18 Lake Martin Home Owners and Boat Owners (LMHOBO)

Comment:

The Lake Martin HOBOs submitted comments to Mr. Jim Crew, APCo, on December 9, 2009, (see FERC filing on December 10) about concerns that this study was being conducted without proper input from local stakeholders. Concerns addressed in that letter were met with interesting denials from Mr. Crew in his letter of December 18, 2009 (filed with FERC on December 21, 2009). The Lake Martin HOBOs stand by comments made in the letter of December 9, and invite a review by FERC into the matter.

One of the positive aspects of the Integrated Licensing Process (ILP) is that it should provide stakeholder input throughout the licensing process, not just at the beginning or at the end of the filing. Specifically, the HOBOs feel that all stakeholders should be allowed input on the relicensing process, and that includes input into the conduct of the studies, just as APCo enjoys. It appears that the potential exists for undue influence by APCo and/or its consultants, if the studies are permitted to continue without oversight and input by all stakeholders.

Response:

The LMHOBO assertion that it had no “input into the conduct of the studies” has no merit. Alabama Power has held numerous meetings since early 2007 to work with stakeholders on identifying issues and developing study plans. Attachment C includes a list (not all-inclusive) of meetings held since the January 2007 Issues Identification Workshop for Martin stakeholders. Alabama Power also held a meeting on March 11, 2009 specifically so the LMHOBO, LMRA, and agency representatives could meet and discuss the proposed study plan with Rob Southwick, the contractor responsible for conducting the 12(g) and 12(h) study. Alabama Power is conducting the studies per FERC approval on April 17, 2009. Alabama Power stands by its response filed on December 21, 2009 (Accession # 20091221-5118).

MIG 4 - Study Plan 13 – Shoreline Management Program

2010-01-13 ADCNR - DWFF

Comment:

The draft shoreline management plan is still pending to date and ADCNR concurs with current study goals of Study Plan 13: Shoreline Management Plan as there were no changes. ADCNR wants to see provisions in the shoreline management plan that provides sound management practices to protect the buffer zone areas. The primary goals are to lessen the negative impacts to terrestrial and semi aquatic wildlife species that utilize the shoreline and to minimize erosion, sedimentation and point source pollution on project lands within the Lake Martin watershed.

Response:

Alabama Power will continue to work with MIG 4 members on the Shoreline Management Program (SMP) and is planning to meet in spring 2010 with MIG 4 members after another draft of the SMP is distributed.

2010-01-18 Lake Martin Home Owners and Boat Owners (LMHOB)

Comment:

The Martin Proposed Shoreline Classification Map of June 10, 2009, is acceptable. Any changes need to be reviewed by all stakeholders. HOB comments on the draft SMP were made to APCo and filed with FERC on January 18, 2010. APCo stated early in the process that causeways and bridges would not be permitted within the project boundaries; however, bridges have been left out of the statement. It is recommended that only bridges built by governmental agencies be allowed within project boundaries.

Response:

Alabama Power is currently analyzing the comments submitted by various stakeholders on the draft SMP distributed on December 11, 2009 and is planning on distributing another draft of the SMP prior to holding a MIG 4 meeting. This comment will be considered in this process.

Comment:

During MIG meetings the HOBs have mentioned several times the need for Alabama Power Company (APCo) to take a more active role in keeping its property clean, particularly the islands and other primitive camping areas. While it is certainly beneficial for campers to be able to use project lands for primitive camping, it remains APCo's responsibility to all stakeholders to periodically remove garbage and debris, especially from the islands.

Ideally, visitors should remove their own trash. APCo should develop a program to inform visitors of their responsibilities to help keep the lake clean by removing all their trash. Signs on the camping sites would help educate the visitors. The Renew Our Rivers advertising campaign relies on stakeholder volunteers for an annual cleanup of a small area, but is inadequate for an area as large as Lake Martin.

APCo should institute a policy of cleaning all primitive camping sites at least twice a year. This could be accomplished with APCo employees or contract cleaning crews, at minimal expense.

In paragraph 3.2 of the draft document the subject of causeways is discussed. The effort to eliminate the building of causeways will be applauded by practically all stakeholders; however, the use of bridges to reach islands is not discussed and it appears that an option of using a bridge in lieu of a causeway is left open for discussion by APCo. The HOBOS request that the building of bridges be restricted to governmental agencies. This policy should be included in paragraph 3.2.

The Martin Proposed Shoreline Classifications map dated June 10, 2009, is acceptable to the HOBOS. If revisions have been made or if revisions are planned to this map, review of the changes will be required.

Response:

This LMHOBOS comment references the draft Shoreline Management Program that was distributed on December 11, 2009 for stakeholder review and comment. Alabama Power is currently analyzing the comments submitted by various stakeholders on the draft SMP distributed on December 11, 2009 and is planning on distributing another draft of the SMP prior to holding a MIG 4 meeting. These comments will be considered in this process.

MIG 5 – Recreation

2010-01-13 ADCNR - DWFF

Comment:

The draft recreation plan is still pending to date and ADCNR concurs with current study goals of Study Plan 14: Recreation Plan as there were no changes. ADCNR still requests that public hunting opportunities be offered as another recreational opportunity. The present Martin license does not have provisions for public hunting.

Response:

Alabama Power will continue to work with MIG 5 members on the Recreation Plan and is planning to meet with MIG 5 members after distributing the next iteration of the MIG 5 Working Documents (Spring 2010).

2010-01-18 Lake Martin Home Owners and Boat Owners (LMHOBO)

Comment:

Primitive camping and visiting project lands is permitted by APCo, as it should be. There are currently no provisions to educate the public to remove their trash from any site visited, nor are there trash collection containers, educational signs, or removal of trash from the islands and other visited sites. APCo currently uses an advertising campaign, Renew Our Rivers, which relies on volunteers to clean up areas, but this program is inadequate for a lake as large as Lake Martin. APCo is responsible for the cleanliness of its project lands; therefore, a program should be developed by the company to insure the collection of trash and other pollutants from APCo lands within Lake Martin boundaries

Response:

Alabama Power is currently analyzing the comments submitted by various stakeholders on the draft MIG 5 Working Documents distributed on December 11, 2009 and is planning on distributing another draft of the Working Documents prior to holding a MIG 5 meeting. This comment will be considered in this process.

Comment:

1. Paragraph 9(c) - During MIG meetings the HOBOs have mentioned several times the need for Alabama Power Company (APCo) to take a more active role in keeping its property clean, particularly the islands and other primitive camping areas. While it is certainly beneficial for campers to be able to use project lands for primitive camping, it remains APCo's responsibility to all stakeholders to periodically remove garbage and debris, especially from the islands. Ideally, visitors should remove their own trash. APCo should develop a program to inform visitors of their responsibility to help keep the lake clean by removing all their trash. Signs at the camping sites would help educate the visitors. The Renew Our Rivers advertising campaign relies on stakeholder volunteers for an annual cleanup of a small area, but is inadequate for an area as large as Lake Martin.

APCo should institute a policy of cleaning all primitive camping sites at least twice a year. This could be accomplished with APCo employees or contract cleaning crews, at minimal expense.

2. Paragraph 14 – A meeting has been held with the Stillwaters Residential Association Board of Directors, Alabama Power representatives (Kleinschmidt), and HOBO representatives to discuss the need for an additional boat ramp and parking lot in the Stillwaters subdivision area. The results of the meeting should be formalized in this working document.

Response:

This LMHOBO comment references the MIG 5 Working Documents that were distributed on December 11, 2009 for stakeholder review and comment. Alabama Power is currently analyzing the comments submitted by various stakeholders on the draft MIG 5 Working Documents distributed on December 11, 2009 and is planning on distributing another draft of the Working Documents prior to holding a MIG 5 meeting. These comments will be considered in this process.

2010-01-18 LMRA Comments on Proposed Study Plans for Martin

Comment:

In December, 2009, Alabama Power Company (APCO) published revised working documents for MIG 5. The revised working documents contain a Recreation Plan Development Process Form. LMRA submits the following comments concerning the Recreation Plan Development Process Form.

Step 1 – Determine Desired Future Condition

- LMRA suggests adding the Irwin Shoals area for study regarding fish habitat and spawning areas. There is a concern that unregulated speed and associated wake action through this area may disturb a sensitive fish habitat.
- LMRA suggests evaluating in conjunction with The Alabama Department of Conservation and Natural Resources whether existing facilities at Wind Creek State Park are adequate for population growth during the term of the license renewal period.

Step 2- Establish Baseline Conditions

8 (c). Current boating and wakeboard activity often create wake conditions that cause conflicts with home owners. LMRA suggests adding a study of current conditions that create conflicts and possible solutions to these conflicts. In the past, proximity regulations have been proposed to limit the distance that boats may travel adjacent to piers and stationary boats. Such regulations might lessen the conflict between home owners and those creating large wakes. A number of items in the working documents indicate that MIG 5 members will determine actions to be taken. LMRA may have additional comments the time those deliberations are undertaken.

Response:

This LMRA comment references the MIG 5 Working Documents that was distributed on December 11, 2009 for stakeholder review and comment. Alabama Power is currently analyzing the comments submitted by various stakeholders on the draft MIG 5 Working Documents distributed on December 11, 2009 and is planning on distributing another draft of the Working Documents prior to holding a MIG 5 meeting. These comments will be considered in this process.

ATTACHMENT B

Responses to LMRA's Comments on Study Plans 12(g) & 12(h)

2010-01-18 LMRA

Comment and Response: NOTE: Due to the length and content of LMRA's comments on Studies 12 (g) and 12(h), Alabama Power responds directly to each paragraph within the body of the comment.

LRMA: In Study Plan 12(g) Alabama Power Company (APCO) indicates that it is examining the effects on recreational use of Lake Martin if rule curve changes are implemented. As a part of this examination, APCO has retained Southwick Associates ("Southwick") to conduct an economic impact study regarding recreational use.

As part of its methodology for gathering information needed to complete the study, Southwick has conducted on-water interviews and mailed surveys to residents to obtain information concerning economic impact on recreation. As outlined in its comments filed with the Commission in February, 2009, LMRA generally agrees with the stated objectives of the study and supports the proposition that an understanding of the economic impact of Lake Martin on Coosa, Elmore and Tallapoosa counties, as well as the economic impact on the three counties of a rule curve change, is necessary before an informed decision can be made. However, LMRA is concerned that Southwick's methodology could materially understate the economic impact of Lake Martin. For example, the number of construction and development related activities on Lake Martin over the last ten years has been significant. LMRA is concerned that Southwick's methodology will not yield an accurate measure of this job creation. Also, Southwick's focus on certain business sectors, i.e. sporting goods and boat sales, other fishing, boating and outdoor businesses, in estimating the effects on lake related businesses appears to exclude many types of businesses such as restaurants, movie theaters, grocery and convenience stores that benefit from spending of lake residents and visitors.

Response: LMRA is correct that Study 12(g) and Study 12(h) will not result in information related to historic job creation in the area. However, through the use of IMPLAN, study results will include the multiplier effects of possible rule curve changes on the economic sectors in the surrounding community, such as restaurants, grocery stores, etc.

LMRA: In determining what constitutes recreation, LMRA believes that other off-water recreational activities, not just on-water activities or businesses on the shore, are relevant to this

determination. Lake Martin has attracted a significant component of vacation or second home users. These homes would not have been constructed absent a recreational motive of the owners. Many residents and visitors come to Lake Martin for off-water reasons such as tranquility of views, natural surroundings, hiking and horse riding trails, flora and fauna of Southern forests, and relaxed lifestyles. An economic impact study that focuses only on water based activities and excludes off-water activities misses a significant segment of the recreation market.

Response: Alabama Power agrees that individuals may reside near or visit Lake Martin for reasons other than participating in water-based recreation. Study 12(g) and Study 12(h) are designed to focus on water-based activity so that results can be used to estimate recreation and economic impacts associated with potential modifications to the rule curve. Recreation activities that are not water-dependent would not be affected by modifying lake levels, and therefore are not addressed in this study.

LMRA: In its comments filed with the Commission in February 2009, LMRA stated that it was then in the final stages of an economic study of Lake Martin conducted by a nationally known real estate consulting firm. A coalition of participants, including LMRA, the Elmore County Commission, the Tallapoosa County Commission, the City of Alexander City, the Middle Tallapoosa River Basin Clean Water Partnership, the Lake Martin Area Economic Development Alliance and Russell Lands, Inc., retained Robert Charles Lesser & Co. (“RCLCO”) to conduct an economic impact analysis of Lake Martin. This historic coalition of governments, public interest groups and private industry agreed that the economic impact of Lake Martin should be measured and evaluated using objective empirical data.

In an effort to address LMRA’s concerns about the narrow scope of two previously completed studies (the Fishery Information Management Systems, Inc., study and the 2007 Kleinschmidt study), the RCLCO study focused on broader based quantifiable data. The RCLCO study relied on property assessments and tax records, income and sales tax records, new construction expenditures, existing businesses on the lake with numbers of employees, historical absorption rates for real estate sales, median household income of lake residents, expenditures by residents living on the lake, expenditures by tourists in Coosa, Elmore and Tallapoosa counties, and other data.

Response: An understanding of the complete economic impact of Lake Martin on the region may be beneficial to the community, and Alabama Power applauds the effort. We presume that by objective empirical data the coalition refers to unbiased data derived from reliable measurement or observation. We are pleased to agree with the coalition on this

point and note that, as proposed, Study 12(g) and Study 12 (h) will collect and synthesize multiple sources of objective empirical data in support of achieving the study goal, which includes results of the survey research currently underway.

Alabama Power maintains the scope of the current study is appropriate to address potential recreation and economic impacts associated with possible changes in the rule curve. Study 12(g) and Study 12(h) will ultimately rely on many of the data types indicated above in addition to the survey data currently being collected as outlined in the FERC approved study plan. In contrast to the RCLCO presentation, Alabama Power's study focuses on the nexus to Lake Martin, which will exclude county-wide tourism expenditures, but will include expenditures associated with Lake Martin tourism.

LMRA: The RCLCO study also used the IMPLAN model for determining the appropriate multipliers applicable to the above-referenced economic factors. The study reflects the present economic impact under the existing Rule Curve, as well as the projected economic impact resulting from the proposed Rule Curve changes. Since the RCLCO study is more broad based and relied upon actual records and data rather than interview and survey opinions presented in the Southwick study, LMRA believes that the RCLCO study represents a significantly more comprehensive and accurate view of the economic impact of Lake Martin.

Response: Alabama Power appreciates the attention and dedication with which LMRA has expressed its interest in Study 12(g) and Study 12(h), and is currently reviewing the RCLCO presentation. Clearly, LMRA believes that primary data collected from the people using the Lake is inferior to various secondary data sources maintained by county, state, and federal agencies. Nevertheless, as detailed in the FERC-approved study plan, Study 12(g) and Study 12(h) have a refined focus, designed to target economic impacts of changes in recreation and property value associated with the potential rule curve changes. The RCLCO presentation is quite broad and addresses the economic impacts of Lake Martin in general, which is beyond the study purpose and Alabama Power's responsibility to examine the effects of continued operation of the Martin Dam Project and proposed changes in operation on the project resources.

The survey instruments developed for Study 12(g) and Study 12(h) build upon those developed, tested, and successfully used for previous recreation use and needs studies, such as TVA's Reservoir Operations Study, the Nantahala Area Recreation Use and Needs Study for Duke Power, the Topoco Whitewater Recreation Study, the Economic Evaluation of Recreation on Flagstaff Lake, and many previous economic impact studies of outdoor recreation (Tennessee Valley Authority, 2004; Bergstrom et al., 1996; Bergstrom et al,

1993; Bergstrom et al., 1990a; Bergstrom et al., 1990b; Cordell et al., 1990a; Cordell et al., 1992).

The general methodology for estimating changes in economic impacts of recreation resulting from changes in reservoir levels and river flows are documented in a number of previous studies (Cordell et al, 1990a; English et al, 1995; English and Bowker, 1996; Cordell and Bergstrom, 1993; Roach et al, 1999) and includes the following basic steps or tasks: 1) define impact region; 2) estimate current or baseline recreational use; 3) estimate current recreational expenditures per user per visit or day; 4) estimate current or baseline regional economic impacts; 5) estimate changes in recreation use under operating alternatives; 6) estimate changes in regional economic impacts under operating alternatives.

In the general methodology applied in the economic impact studies referenced above, with the exception of the TVA study, a standard procedure was to conduct detailed expenditure surveys of recreational users. Thus, estimation of economic values based on primary data is the preferred method, particularly for site-level analysis. Primary data were not collected for the TVA study due to budget and time constraints.

Current or baseline recreation use of Lake Martin is being estimated through targeted sampling of recreation use at the Lake, as well as surveys of shoreline property owners.

For development of expenditure profiles, recreation users and shoreline property owners are being asked about their expenditures in the impact region (Coosa, Elmore, and Tallapoosa Counties) by various expenditure categories (e.g., food, lodging, gasoline). Estimates of mean expenditures per trip will be broken down into specific expenditure categories (e.g., food, lodging, gasoline) needed to estimate economic impacts of recreation and shoreline property ownership.

Total expenditures by residents under current or baseline conditions will be estimated by multiplying mean expenditures per household per day by the estimated number of total days residents live or visit their reservoir residence. Total expenditures by reservoir visitors (people who do not own a reservoir residence) will be estimated by multiplying mean expenditures per visitor per trip by the estimated number of total current recreation visits to reservoirs or tailwaters at Lake Martin.

Total expenditures by resident users and visitors will then be input into the IMPLAN model to estimate current or baseline economic impacts of resident expenditures and visitor expenditures on the economy. Expenditures by residents and visitors represent final demands for goods and services. The IMPLAN model calculates the regional economic impacts resulting from economic production, service and wholesale and retail trade activities needed to meet these final demands. Regional economic impacts are typically expressed in total output, total value added, and total employment. The economic impact

analysis will focus on estimating the impacts of “new money” brought into the impact region by residents and visitors. This analysis will require separating out the portion of total resident and visitor expenditures that comes from outside of the Lake Martin impact region (new money) from expenditures that originate from within the Lake Martin impact region and therefore represent inter-region transfers.

The percent change estimates from the trip response model will be applied to the estimates of current or baseline days of residence for reservoir residents and current or baseline trips for visitors to estimate total projected resident days of residence and visitor trips under each operating alternative.

Total expenditures under each operating alternative will be estimated by multiplying total days of residence under each operating by mean expenditures per household per day. Total expenditures by visitors (people who do not own residences) under each operating alternative will be estimated by multiplying total visitor trips under each operating alternative by mean expenditures per visitor per trip. Following the same procedures for estimating current or baseline economic impacts, total expenditures by residents and visitors will then be entered into the IMPLAN model to estimate regional economic impacts under each operating alternative.

LMRA: Importantly, the RCLCO study also estimated future economic impact of Lake Martin. While this part of the study was largely dependent upon assumptions regarding pace of development, absorption rates, construction costs, and pricing, the assumptions used by RCLCO were reasonable based upon national and regional trends observed by RCLCO in its national consulting practice. LMRA recommends that the RCLCO study be given consideration equal to the Southwick study in determining the economic impact of recreation on Lake Martin. The results of the RCLCO study are attached hereto as Exhibit A.

Response: While we appreciate the opportunity to review results of the RCLCO presentation, it would be beneficial to also review the detailed methodology, which would enhance our understanding of the processes used for the study and the validity of the assumptions used in estimating future economic impacts. Alabama Power will comment more directly on the RCLCO presentation once a detailed methodology is provided.

The RCLCO study appears similar to Study 12(g) and Study 12(h), with the primary differences being:

1. Study 12(g) and Study 12(h) are focused on estimating effects of continued operation of the Martin Dam Project and potential changes to the rule curve on recreation use

and associated economic impacts, property values, and business activity associated with Lake Martin. In contrast, the RCLCO study focuses on estimating the effects of continued operation and potential changes to the rule curve on the economic impacts associated with all activity at Lake Martin, based on the assumption that all development and activity at the lake would not occur in its absence.

2. Study methods likely differ in a variety of ways, however in the absence of a detailed methodology, we can only make the following general comparisons:
 - a. Inputs to the RCLCO presentation appear to be based on existing information (e.g., household income, retail expenditures, etc.). Study 12(g) and Study 12 (h) use primary data collected from recreationists and shoreline residents.
 - b. Occupancy assumptions for part time residents (7-9 weeks versus 10-11 weeks) are generally based on the length of time the water level is maintained at full pool currently and under a proposed alternative rule curve. Study 12(g) and Study 12(h) use primary data provided by part time residents to estimate the length of time they remain at their summer lake house currently, and under proposed conditions.
 - c. It is not clear what assumptions regarding the percent full-time versus part-time households are based upon. Study 12(g) and Study 12(h) will use primary data from survey respondents to identify whether residents are part time or full time residents.

Regardless of the similarities and differences between the RCLCO presentation and the FERC approved studies conducted by Alabama Power, there are numerous questions about the RCLCO presentation regarding the methods used that should be clarified. For example, it is not clear whether household retail expenditures (\$20,907/year) is assumed to all be spent within the local area. The purpose of examining tax revenue from parcels built since 2000 is unclear as it relates neither to current nor future economic impacts. Also, while it is understandable that RCLCO study supporters desired to extend analysis out to 2044 to consider the life of a new project license, it raises the question of whether results are projected beyond the ability of the study. We also question whether the shorelines of Lake Martin could realistically accommodate the projected expansion (e.g., 6,211 new housing units, 4 new golf courses, etc.), particularly as the proposed future development would occur primarily on the shorelines in Tallapoosa County.

LMRA: In summary, LMRA supports the conducting of an economic impact study according to the objectives expressed in Study Plan 12(g). In reviewing the Technical Scope of Work in

Attachment A to Study Plan 12(g) and considering statements made in scoping meetings concerning the focus of the economic impact study, LMRA believes the focus of the study should be expanded significantly beyond that of the Southwick study in order to provide an accurate understanding of the economic impact of all types of recreational use on Lake Martin. The RCLCO study provides an accurate analysis of the economic impact of Lake Martin on the surrounding area and LMRA strongly recommends that it be used concurrently with the Southwick study to measure the economic impact of recreational use of Lake Martin.

***Response:* It is possible the RCLCO presentation may lend value to understanding the economic impacts of Lake Martin on the local economy; however, the scope of the effort appears too broad to address the topic of interest for the Lake Martin relicensing, and critical supporting documentation that would aid in the understanding and application of presentation results is absent. We recommend that additional information be provided regarding methods and the basis for the numerous assumptions used to develop the IMPLAN inputs, so that the information can be used by others. Without supporting information, we are not able to effectively evaluate presentation results, and thus cannot support LMRA's recommendation that the report be considered by FERC in evaluating the effects of continued operation of the Martin Dam Project and potential changes in operation on project resources.**

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ATTACHMENT C

Martin Relicensing Meetings 2007-2009

Date	Description
January 30, 2007	Issue Identification Workshops
May 24-25, 2007	Informational Meetings
June 12, 2007	Agency Meeting
September 11, 2007	Agency Meeting
September 26-27, 2007	Martin Issue Group Meetings
February 13, 2008	Lake Martin HOBO
February 14, 2008	Agency Meeting
February 15, 2008	ARA and WWF
March 6, 2008	Martin Rule Curve Study
April 1 - 2, 2008	Tallapoosa River Operations, FERC eFiling, and Rule Curve Study
April 2, 2008	MIG 1, 2, 3, 4, and 5 Meeting
August 6, 2008	Agency Meeting
August 28, 2008	LMRA and LMHOBO
September 10-11, 2008	FERC Scoping Meeting
October 6, 2008	MIG 3 Meeting
January 7, 2009	Study Plan Meeting
January 8, 2009	Striped Bass Focus Group
February 10, 2009	MIG 3 Modeling Technical Workshop #1
February 26, 2009	Agency Meeting
March 11, 2009	Review Socioeconomic Study – LMRA and LMHOBO
June 10, 2009	MIG 4
August 6, 2009	MIG 5
September 29, 2009	MIG 3 Modeling Technical Workshop #2
October 21, 2009	MIG 1, 2, 4, and 5
December 3, 2009	Initial Study Report Meeting