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Cc:
Subject: Martin Relicensing - Distribution of Draft MIG 5 (Recreation) Study Plans

Attachments: 1 Recreation Plan Study Plan (DRAFT 11-16-07).doc; 2 Socioeconomic Impacts of Rule Curve Change Study Plan (DRAFT 11-16-07).doc; ILP study_criteria.pdf

MIG 5 Members,

At the September 2007 Martin Issue Group (MIG) meetings in Alexander City, we discussed the MIG sheets and provided a summary of the study plans that Alabama Power has developed in consultation with the state and federal resource agencies to address the effects of the Martin Project on the environmental resources. The notes from those meetings and the PowerPoint presentations are available on the Martin Relicensing website at <http://www.alabamapower.com/hydro/martin.asp>. We indicated that the draft study plans were undergoing further revisions and would soon be available for review and discussion by the applicable MIGs.

Accordingly, attached herewith for your review and comment are the following 2 draft study plans associated with MIG 5, Recreation. These are the plans Alabama Power is proposing to implement upon FERC approval. As discussed during the September meetings, the study plans will be submitted to FERC in June 2008, and should be approved by FERC and ready for implementation in early 2009. Please review these draft plans and provide any comments/edits you may have to me on or before **December 14, 2007**. (The documents are in Microsoft Word and can be edited easily using track changes.) To facilitate your review, also attached is a copy of FERC's Study Criteria that must be followed in the Integrated Licensing Process.

MIG 5 - Recreation Draft Study Plans

1. Recreation Plan
2. Socioeconomic Impacts of Rule Curve Change

You may also be aware that on October 23, 2007, Alabama Power filed a request with FERC for approval of a drought-based temporary variance of the Martin rule curve. FERC is currently reviewing our request, and we sincerely appreciate the letters and emails of support that were filed by homeowners and the state and federal resource agencies. We anticipate receiving a favorable ruling from FERC by the end of next week.

Our next meeting of the MIGs will occur in early February 2008 at the Betty Carol Graham Center in Alexander City. We will focus primarily on the comments received on the draft study plans for each MIG. Once an exact date in February is selected, we will notify you by email and also post the date on our website. As always, if you cannot attend meetings, notes and meeting materials will be posted to the Martin Relicensing website within two weeks following the meeting.

If you have any questions, please send me an email or give me a call at 205-257-4265. We look forward to your continued participation in the Martin relicensing effort. Have a safe and joyous holiday season!



1 Recreation Plan
Study Plan ...



2 Socioeconomic
Impacts of Ru...



ILP
ly_criteria.pdf (83 K)

Jim

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Study Plan 1 - Recreation Plan

1.0 GOALS AND OBJECTIVES OF STUDY

Alabama Power Company (APC) intends to develop and implement a Recreation Plan for the Martin Project that would describe the Project and existing facilities, discuss current and future use estimates, discuss existing recreational use data and facility inventories, and discuss proposed plans for recreational facilities in the future.

2.0 RELEVANT RESOURCE MANAGEMENT GOALS

FERC requires that each licensee prepare and implement a recreation plan. APC's Recreation Plan includes an assessment of the physical condition of the recreation facilities/sites, their current and projected future use, the proposed physical improvements for each facility/site, a compilation of ownership, operation and maintenance responsibilities, and a tentative schedule for the implementation of the improvements. Because development of the recreation plan involves extensive consultation with the agencies and other stakeholders, APC will review and include in their analysis of recreational use and demand the appropriate state and Federal resource plans.

3.0 BACKGROUND AND EXISTING INFORMATION

- Alabama Power Company. 2003. FERC FORM 80.
- E/PRO and Alabama Power Company. Coosa and Warrior River Recreation Plans.
- Kleinschmidt report of recreational use and facility inventory (this data will be ready in December 2007).
- ADECA data (i.e., SCORP).
- Alabama Census data.

4.0 PROJECT NEXUS

The nexus to the Project is the FERC project boundary and general project vicinity. While the recreation plan focuses on facilities and activities within the project boundary, a general description of the facilities and activities in the Project vicinity are also included.

5.0 STUDY AREA AND STUDY SITES

The study area will include Lake Martin, its tributaries, and lands and water within the FERC project boundary for the Martin Project. As noted above, the study area will be expanded to include a general description of the sites and facilities in the project vicinity.

6.0 PROPOSED METHODOLOGY

The proposed method for implementing this study would be as follows:

- 1) Gather baseline data (complete the data collection for 2007).
- 2) Develop a report of existing information.
- 3) Meet with MIG 5 to discuss desired conditions on Lake Martin.
- 4) Determine existing and potential future use.

- 5) Determine what enhancement measures are needed and when and who is responsible.
- 6) Develop Draft Recreation Plan.
- 7) Develop Final Recreation Plan.

7.0 CONSISTENCY WITH GENERALLY ACCEPTED SCIENTIFIC PRACTICE

Development of the Recreation Plan will follow the consultation guidelines in the Integrated Licensing Process and past practices associated with developing the Recreation Plans for the Coosa and Warrior Projects.

8.0 PRODUCTS

A draft and final Recreation Plan will be developed in consultation with the MIG 5. The Recreation Plan will include the following:

- Glossary and Commonly Used Acronyms;
- Purpose and Goals of the Recreation Plan;
- Project Description;
- Data Collection Methods;
- Estimate of Use – Existing and Future;
- Concept Plans for Recreation Enhancements;
- Recreation Maps.

A draft Recreation Plan will be distributed to the MIG 5 for review and comment. A final Recreation Plan will be provided as part of the license application that will include a PDF copy of the literature/citations used in the report.

9.0 SCHEDULE

Consultation with MIG 5 members	May 2009 – June 2010
Draft Recreation Plan	September 2010
Final Recreation Plan	December 2010

10.0 LEVEL OF EFFORT AND COST

APC estimates the cost of conducting a Draft and Final Recreation Plan, including consultation with the MIG 5, will be approximately \$125,000.

11.0 REFERENCES

Study Plan 2 - Socioeconomic Impacts of Rule Curve Change

1.0 GOALS AND OBJECTIVES OF STUDY

The purpose of this study is to estimate the social and economic impact of a rule curve change at the Martin Project.

2.0 RELEVANT RESOURCE MANAGEMENT GOALS

Fluctuating water levels at hydropower projects may affect resources associated with a hydroelectric project. Not only could fluctuating water levels affect the environmental resources (*i.e.*, fisheries, erosion, aquatic plants, etc.), they also affect social and economic resources (recreation use, property values, etc.). Many Lake Martin stakeholders have requested an examination of how a rule curve change at Lake Martin could potentially affect recreation visitation, property values, and reservoir related businesses.

3.0 BACKGROUND AND EXISTING INFORMATION

Fishery Information Systems, Inc. (FIMS) conducted a study in the 1990s that estimated recreation visitation, trip expenses, distribution of recreation use, property values, and reservoir related business activity. Much of the information provided in the report (FIMS, 1997) is relevant to possible rule curve changes associated with the relicensing of Lake Martin. The FIMS report will provide the basis for this study and will be used as a template for providing current effects of a possible rule curve change. Furthermore, APC conducted a recreational use study in 2007 that will provide current recreational use patterns as well as an up-to-date inventory of on-the-water businesses at Lake Martin.

4.0 PROJECT NEXUS

The nexus to the Project is the FERC project boundary and general project vicinity. The FIMS study also identified the market area for Lake Martin visitors, generally including the counties surrounding the Project, as well as major metropolitan areas in the vicinity (Birmingham and Montgomery).

5.0 STUDY AREA AND STUDY SITES

The study area will include Lake Martin, its tributaries, and lands and water within the FERC project boundary for the Martin Project. As noted above, the study area will be expanded to include a qualitative assessment of market areas associated with recreation visitation at the Project.

6.0 PROPOSED METHODOLOGY

The proposed method for implementing this study would be as follows:

- 1) Use existing data (2007 study) to estimate current year recreation use.
- 2) Adjust trip expense information from FIMS study using the consumer price index (CPI).
- 3) Adjust trip expenses by market segment from FIMS study using current population data for market segments identified in FIMS study.

- 4) Update property value information from interviews with knowledgeable real estate personnel around Lake Martin.
- 5) Update number of businesses associated with Lake Martin using phone books, advertising in magazines, websites, etc.
- 6) Adjust business related income using CPI.
- 7) Conduct phone interviews with those businesses dependent on a winter draw down (e.g., seawall construction).
- 8) Use existing regression equations reported in FIMS study to estimate economic impact, recreational use, and property values of a three to five foot increase in winter pool as well as changes in number of months at full pool.

7.0 CONSISTENCY WITH GENERALLY ACCEPTED SCIENTIFIC PRACTICE

Updating existing studies is common practice in relicensing proceedings. The methodology used in the FIMS study is common to economic and recreation studies at other hydropower project in the Southeast.

8.0 PRODUCTS

A draft report will be distributed to the MIG 5 for review and comment. A final report will be provided as part of the license application that will include a PDF copy of the literature/citations used in the report.

9.0 SCHEDULE

Consult with MIG 5	June 2009
Collect Updated Data from Identified Sources	October 2008 – January 2009
Draft Report	Fall 2009
Final Report	Spring 2010

10.0 LEVEL OF EFFORT AND COST

APC estimates the cost of conducting the study, including consultation with the MIG 5, will be approximately \$125,000.

11.0 REFERENCES

Fishery Information Management Systems. 1997. Potential Impacts of Water Diversion on Recreational Use and Economic Values Associated with Six Alabama Reservoir Systems, Volume 6: The Martin Reservoir System. ADECA-OWR-97-07. Alabama Department of Economic and Community Affairs, Montgomery, AL.



Understanding the Study Criteria

Integrated Licensing Process

*Federal Energy Regulatory Commission
Office of Energy Projects*

April 6, 2005

Understanding the Study Criteria

Reaching agreement on study needs can be difficult and contentious. Historically, deferring resolution of fundamental issues about what information gathering and studies are necessary until after the license has been filed with the Commission has in some cases resulted in lengthy licensing proceedings. The Integrated Licensing Process (ILP) is designed to eliminate that problem. Working collaboratively with the hydro industry, state and federal resource agencies, tribes, and non-governmental organizations, the Commission developed seven criteria that must be addressed by parties requesting studies in the ILP. Following these criteria will help formulate a well structured and thought out request that can help focus discussions about the merits and applicability of a study to evaluate the effects of a project on environmental resources.

This document is intended to explain the study criteria and help stakeholders craft study requests (18 CFR § 5.9(b)) that will clearly identify their information needs and expectations and explain why they need the information. A clear understanding of the study criteria and adherence to these criteria in formulating study requests should facilitate the development of study plans (18 CFR § 5.11 (b)-(e)).

While the reader may wish to use the suggested structure as a template for a request, there are a number of variables that will determine whether a study or a totally different approach would be best suited to a particular project and approved by the Commission.

Study Request Criteria

As specified by CFR 18, § 5.9(b) of FERC's regulations on the ILP, any study request must:

- (1) Describe the goals and objectives of each study proposal and the information to be obtained;
- (2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;
- (3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study;
- (4) Describe existing information concerning the subject of the study proposal, and the need for additional information;
- (5) Explain any nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;
- (6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate filed season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge; and
- (7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Study Plan Criteria

CFR 18 § 5.11 (b)-(e) specifies the following requirements for the applicant's proposed study plan. Note that these requirements closely parallel those described in § 5.9(b).

(b) The potential applicant's proposed study plan must include with respect to each proposed study:

- (1) A detailed description of the study and the methodology to be used;
- (2) A schedule for conducting the study;
- (3) Provisions for periodic progress reports, including the manner and extent to which information will be shared; and sufficient time for technical review of the analysis and results; and

- (4) If the potential applicant does not adopt a requested study, an explanation of why the request was not adopted, with reference to the criteria set forth in [§ 5.9\(b\)](#).

(c) The potential applicant's proposed study plan must also include provisions for the initial and updated study reports and meetings provided for in [§ 5.15](#).

(d) The applicant's proposed study plan must:

- (1) Describe the goals and objectives of each study proposal and the information to be obtained;

- (2) Address any known resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;

- (3) Describe existing information concerning the subject of the study proposal, and the need for additional information;

- (4) Explain any nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied;

- (5) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers any known tribal interests;

- (6) Describe considerations of level of effort and cost, as applicable.

(e) The potential applicant's proposed study plan must be accompanied by a proposal for conducting a study plan meeting or meetings during the 90-day period provided for in [§ 5.12](#) for the purpose of clarifying the potential applicant's proposed study plan and any initial information gathering or study requests, and to resolve any outstanding issues with respect to the proposed study plan. The initial study plan meeting must be held no later than 30 days after the deadline date for filing of the potential applicant's proposed study plan.

Goals and Objectives

§5.9(b)(1) Describe the goals and objectives of each study proposal and the information to be obtained;

This paragraph describes what the study is intended to accomplish, the goals and objectives of the study, and specific information to be obtained. The goals of the study should clearly relate to the need to evaluate the effects of the project on a particular resource. The objectives are the specific information needs to be gathered to allow achievement of the study goal. This section provides the context for why the study is being requested.

Relevant Resource Management Goals

§5.9(b)(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;

§5.9(b)(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study;

This discussion should clearly establish the connection between the study request and the management goals of the requesting agency or tribe, or in the case of non-governmental agencies or others without a jurisdictional mandate or obligation, between the study and resource of interest. A statement by an agency connecting its study request to a legal, regulatory, or policy mandate is entitled to appropriate consideration. However, it is much easier to understand the relationship of an information need to a specific management goal than to broadly stated mandates established in law or regulation. Where such mandates are integral to the need for the information, the requester needs to thoroughly explain how the mandate relates to the study request and, in turn, project impacts.

Background and Existing Information

§5.9(b)(4) Describe existing information concerning the subject of the study proposal, and the need for additional information;

The purpose of this discussion is to highlight the gap in existing data, giving full consideration to what has been provided in the PAD or is known from other information sources relevant to the project. This discussion should clearly explain why the existing information is inadequate and the need for additional information.

Project Nexus

§5.9(b)(5) Explain any nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;

This discussion should clearly draw the connection between project operations and the effects (direct, indirect, and/or cumulative) on the applicable resource. Just as important, this discussion should explain how the requester will use the information to develop protection, mitigation, and enhancement measures, including those related to an agency's mandatory conditioning authority under 401 of the Clean Water Act or sections 4(e) and 18 of the Federal Power Act.

Proposed Methodology

§5.9(b)(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate filed season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge;

Study requests should be as detailed as possible. It is important to relay to the applicant your expectations on the scope and methods so that an adequate study plan can be developed. The requester may describe the proposed methodology by outlining specific methods to be implemented (e.g. study area, study sites, data collection methods, etc.) or simply by referencing an approved and established study protocol or methodology (e.g. Henderson 1999, or Missouri State Water Quality Sampling Protocols for Lead, 1999). If providing a detailed methodology, the requester should demonstrate how the requested methodology is consistent with generally accepted practice within the scientific community or, as appropriate, considers relevant tribal values and knowledge. The requested study must be generally accepted in the context of how it is being used. For example, just because an IFIM is a generally accepted methodology for determining the relationship of flow to available habitat, it doesn't mean you would use IFIM for answering questions about fish populations.

LEVEL OF EFFORT AND COST

§5.9(b)(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

This section should describe your expectations of the level of effort and costs associated with the development and implementation of the requested study. This would be used to provide the applicant with a better understanding of your expectations for the completion of the study. Within this section, you should also provide a justification as to why any proposed alternative studies would not be sufficient to meet the stated information needs. Proposed alternative studies could be studies being proposed by the applicant in the PAD or those being requested by other parties.