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OFFICE OF THE SECRETARY
John T. Gangemi
Conservation Director
00 NOV -2 AM 10:45
FEDERAL ENERGY
REGULATORY COMMISSION

October 30, 2000

ORIGINAL

Federal Energy Regulatory Commission
Office of the Secretary
888 First Street NE
Washington, DC 20426

**RE: Comments on the Draft Environmental Assessment for the Rule Curve Amendment
Neely Henry Reservoir Hydroelectric Project, FERC No. 2146-081**

Dear Sirs:

American Whitewater Affiliation hereby files the original and eight copies of **COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE RULE CURVE AMENDMENT** on behalf of American Whitewater and the Coosa River Paddling Club. The above parties previously filed a motion to intervene on August 23, 1999.

We have enclosed an additional copy to be file-stamped and returned in the enclosed envelope.

Copies of this document have been served on all parties listed in the Service List of the Draft Environmental Assessment (see attached service list and certificate of service).

Thank you for your consideration in this matter.

Sincerely,

[Handwritten signature]
John T. Gangemi

Conservation Director, American Whitewater

Enclosures: American Whitewater's Comments on the DEA

Cc: Ronald McKittrick
Dan Adamson
Anne Miles
Project No. 2147-081 DEA Service List

Conservation and Access Program: 482 Electric Avenue, Bigfork, MT 59911
Phone 406-837-3155 FAX 406-837-3156 jgangemi@digisys.net

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UNITED STATES OF AMERICA
 FEDERAL ENERGY REGULATORY COMMISSION

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Alabama Power)
 Neely Henry Reservoir Hydroelectric Project)
 Comments On the FERC Draft)
 Environmental Assessment for Rule Curve)
 License Amendment)

FEDERAL ENERGY
 REGULATORY COMMISSION
 Project
 Alabama

**COMMENTS AND RECOMMENDATIONS ON THE DRAFT
 ENVIRONMENTAL ASSESSMENT FOR A RULE CURVE LICENSE
 AMENDMENT AT THE NEELY HENRY RESERVOIR HYDROELECTRIC
 PROJECT ON BEHALF OF THE AMERICAN WHITEWATER AFFILIATION
 AND THE COOSA RIVER PADDLING CLUB**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §385.214, the American Whitewater Affiliation and the Coosa River Paddling Club (hereinafter referred to as the Boating Groups) hereby request leave to comment on the FERC draft environmental assessment for the Neely Henry Reservoir Hydroelectric Project No. 2146-081.

Alabama Power Company (APC) has requested to revise the rule curve and Interim Flood Control Plan for Neely Henry Reservoir on the Coosa River in Alabama. APC has also requested approval of a revised reservoir regulation procedure for Neely Henry Reservoir. Representatives of the above listed groups are concerned that changes in reservoir management at Neely Henry Reservoir may affect lake levels and instream flows for aquatic biota and recreation at the respective downstream reservoirs and river reaches. The DEA does not adequately analyze potential downstream impacts. Much of the analysis focuses on Neely Henry Reservoir itself failing to account for hydrologic changes that may have an impact on downstream pool elevations and river flows. The Boating Groups request that FERC staff model the potential affects of the rule changes longitudinally on downstream interests under a continuum of water yields in the basin. The output from this model should permit analysis of the rule curve changes and its longitudinal affect at any point downstream at any point in time. The DEA contains no such analysis of downstream affects.

The Parties

1. American Whitewater Affiliation (hereinafter known as American Whitewater) is a national non-profit 501(c)3 river conservation and recreation organization founded in 1957. We have over 8,000 members and 160 canoe club affiliates, representing approximately 60,000 whitewater paddlers across the nation. American Whitewater's mission is the conservation and restoration of whitewater resources and enhancing opportunities to enjoy them safely. As a conservation oriented paddling organization,

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American Whitewater has a strong interest in the future of the Coosa River and, therefore, any proposed amendments to the Neely Henry Reservoir hydroelectric project. A percentage of our membership recreates on the Coosa River on a regular basis. Federal actions that affect paddling opportunities on the river may potentially adversely impact opportunities for American Whitewater members to utilize the river resource. Therefore, American Whitewater has a direct interest in this license amendment for the Neely Henry Reservoir hydroelectric project. Furthermore, American Whitewater intervened in this proceeding on August 23, 1999.

2. The Coosa River Paddling Club is a non-profit corporation organized under the provisions of the Alabama Nonprofit Corporation Act. The Coosa River Paddling Club has 350 members. The Club promotes navigation of wild and semi-wild rivers and streams by canoe, kayak, and other person-powered craft. The Club also teaches paddle skill development and safety. The Coosa River Paddling Club promotes conservation of wild and semi-wild rivers and works with landowners to insure public access to the states rivers and streams. Members of the Coosa River Paddling Club recreate on the Coosa River on a regular basis. As such, federal actions on the Coosa River will have an affect on the Coosa River Paddling Club and its constituents.

COMMENTS ON THE FERC DRAFT ENVIRONMENTAL ASSESSMENT
DOCUMENT

As stated above, the Boating Groups are concerned that the DEA focus primarily on the potential benefits and impacts to Neely Henry Reservoir but failed to adequately address downstream impacts. Multiple reservoirs and river reaches exist below Neely Henry Reservoir. These reservoirs have their own operational rule curves dictating pool levels at specified times of the year. Flows into the river reaches are in turn dependent on achieving specific pool elevations for releases to occur. The DEA fails to address how the new rule curve affects downstream reaches particularly homeowners at downstream reservoirs, recreational users of the river reaches or the integrity of the aquatic biota.

Whitewater flows into the Coosa River below Jordan Dam, FERC Project No. 618, are conditional on specific pool elevations being met prior to a release. No whitewater releases occurred in 2000 due to insufficient pool elevations. The Boating Groups have not been convinced by the DEA analysis or lack thereof, that operational changes to the rule curve at Neely Henry will not have domino effect on pool elevations at Jordan Dam thereby precluding future whitewater releases.

From the perspective of a simple mass balance equation common sense suggests that operational changes to the rule curve, i.e., storage, will have a ripple affect through the downstream water storage projects and their respective outlets. A simplified hydrologic mass balance equation exemplifies the point:

Inflow (cfs) less Storage Volume (cfs or acre ft.) equals Outflow (cfs)

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In the simplified example inflow is equilibrated with outflow once the storage volume is filled except where outflow is manipulated for other purposes. Changes in the rule curve operations as proposed by APC equate to changes in storage volume in the simplified mass balance equation. These changes in storage volume will in turn affect outflow. These outflow changes will ripple through each reservoir and river reach downstream of Neely Henry Reservoir. The DEA does not provide sufficient information to the Boating Groups or other members of the public to determine the potential affect of the proposed rule curve changes on hydrologic mass balance of the Coosa River system. Granted each year the storage associated with the new rule curves will equilibrate inflow and outflow but it is not clear how this will alter the timing and delivery of water to downstream reservoirs and river reaches. The increased storage associated with higher rule curves could delay pool elevation targets at downstream reservoirs.

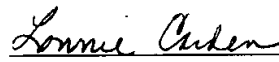
The Boating Groups request that FERC require additional analysis on the timing and delivery of water to downstream reservoirs and river reaches. This is best undertaken through use of a model capable of calculating the more complex hydrologic mass balance equations associated with each reservoir. Furthermore, the model could generate dates anticipated for achieving respective downstream reservoir pool elevations under a continuum of water yield scenarios for the Coosa River basin. A number of these downstream hydroelectric projects contain license articles with specific pool elevation targets. The model should be run in such a fashion that each of these pool elevation targets are analyzed to determine compliance.

CONCLUSION

The Boating Groups request that the FERC conduct additional analysis modeling the hydrologic affect of the proposed rule curve changes on downstream reservoirs and river reaches with particular attention to compliance with existing license articles at downstream hydropower projects. This analysis should be provided to the public for review. For these reasons, we ask that the DEA be supplemented as set forth in this filing.

Dated: October 30, 2000


John T. Gangan, Conservation Director
American Whitewater
482 Electric Avenue
Bigfork, MT 59911
(406) 837-3155


Lonnie Carden, Coosa River Paddling Club
5143 Atlanta HWY
Montgomery, Alabama 36109

-----Original Message-----

From: Kevin Colburn [mailto:Kevin@amwhitewater.org]
Sent: Tuesday, February 03, 2004 11:20 AM
To: Lovett, Barry K.
Subject: RE: Attachment for December 11th Meeting Notes

Barry,
Thanks for the update.
Kevin

-----Original Message-----

From: Lovett, Barry K. [mailto:BKLOVETT@southernco.com]
Sent: Tue 2/3/2004 9:55 AM
To: Kevin Colburn
Cc:
Subject: RE: Attachment for December 11th Meeting Notes

Kevin,

As we have previously explained to our many Recreation IAG participants, we are currently focusing significant resources on completing discussion on plans for recreational facilities. We anticipate that item will reach closure in the near future. Subsequent to that, we plan on addressing the Jordan recreational flow issue along with several other remaining recreational issues at Jordan and our other hydro developments being relicensed.

We are indeed planning on responding to the Jordan recreational flow issue raised within this relicensing process. We will see also that that response is made in the context of current/ongoing regulatory requirements to monitor and address that same issue.

Please let me know if you have any additional questions

Thanks.

Barry Lovett

-----Original Message-----

From: Kevin Colburn [mailto:Kevin@amwhitewater.org]

Sent: Wednesday, January 28, 2004 1:32 PM

To: Lovett, Barry K.

Subject: RE: Attachment for December 11th Meeting Notes

Barry,

As a stakeholder participating from quite a distance, largely through the involvement of Lonnie Carden and through reading meeting minutes, I feel I may need a bit of extra clarification. I have not seen anything regarding whitewater recreation in the meeting notes for some time. What is the schedule for addressing the significant whitewater recreation issues related to the project as we move forward. I would love an update from your perspective on where the process stands and where it is heading as it relates to whitewater rec. This will help me plan my travel and involvement in the coming year.

Thanks,
Kevin Colburn
American Whitewater
Eastern Conservation and Access Director

-----Original Message-----

From: Lovett, Barry K. [mailto:BKLOVETT@southernco.com]

Sent: Tue 1/27/2004 2:58 PM

Subject: Attachment for December 11th Meeting Notes

Good Afternoon!

On January 18th, I mailed the draft meeting notes for our Upper and Lower Coosa IAG meetings that took place on December 11th, 2003. To those minutes I should have included the handout ("Draft Recreation Site Priority Listing") that was provided to the meeting attendees. As we discussed in the meetings, this listing is the culmination of the numerous IAG meetings, as well as recent meetings with counties, municipalities, the Alabama Department of Transportation and the Alabama Department of Conservation and Natural Resources.

That meeting handout is attached below.

Please let me know if you have any related questions.

Thanks.

Barry Lovett