



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
1590 ADAMSON PARKWAY, SUITE 200
MORROW, GEORGIA 30261-1777

JUN 19 2015

Regulatory Division
SAS-2009-00042

Mr. Matt Windom, Executive Director
Carroll County Water Authority
Post Office Box 739
Carrollton, Georgia 30112

Dear Mr. Windom:

I refer to Department of the Army Permit application SAS-2009-00042 for the proposed Indian Creek Reservoir Project in Carroll County, Georgia. The reservoir would be 643-acres, and provide 18 million gallons per day (MGD) via pumped diversion from the Little Tallapoosa River. The proposed project would impact 18.8 acres of wetland, 47,468 linear feet of streams, 36.8 acres of open water, and 0.38 acres of ephemeral streams. The site is located at latitude 33.6142 and longitude -85.2870, approximately 4.5 miles northwest of the City of Bowdon, in Carroll County, Georgia.

On April 30, 2015, we sent a memorandum to the US Army Corps of Engineers, Mobile District (SAM), requesting a determination as to whether or not the construction and operation of water supply reservoirs proposed in the ACT Basin in north Georgia would have an adverse impact on any Mobile District Federal projects. A complete copy of the revised report dated April 21, 2015, and ResSim modeling runs and spreadsheets provided by Hydrologics, were forwarded to SAM for reference and review.

On June 10, 2015, we received a memorandum from SAM with their comments and suggestions based on their Project Delivery Team's (PDT) review of the Cumulative Hydrology Impact Study, the ResSim hydrologic model, and the post processing spreadsheet as requested. The review by the PDT did not uncover any significant issues that would impact the operation of the Federal projects in the ACT Basin or their authorized purposes. The following are suggestions/comments submitted by the Mobile District:

- a. The report, as submitted to SAM, did not consider potential water quality impacts as a result of the proposed action. It is recommended that the appropriate level of analysis be conducted to evaluate the impacts to standard water quality parameters such as dissolved oxygen, temperature, nutrients, turbidity, eutrophication, etc, at both the US Army Corps Engineers projects and the rest of the ACT Basin.

- b. While no flaws were identified at this time in the modeling, the final modeling should be resubmitted with only final scenarios. The alternatives submitted for review spread across several different simulations and multiple watersheds. This made the review challenging and time consuming.
- c. For the official record and potential permitting purposes, the final modeling should be a single ResSim watershed with at most two simulations. The first simulation should contain Scenarios 1-6 described in the original September 30, 2014, report. The second simulation should contain Scenarios 3a, 4a, 5a, and 6a, as provided in the April 24, 2015, report addendum that limited Allatoona Lake's withdrawal to the current contract amount.

On June 11, 2015, I spoke with Mr. James Hathorn and Mr. Jonas White of SAM to obtain clarification of these comments. Based on our discussion, comment a. is stating that water quality impacts were not considered as part of this review, and SAM recommends that the appropriate level of analysis be conducted to evaluate the impacts to standard water quality parameters. Water quality monitoring requirements are the purview of the States of Georgia and Alabama, and any such requirements would be imposed and enforced by the States. Comments b. and c. are stating that the model should be resubmitted with only final Scenarios. The final modeling results should constitute a single ResSim watershed with at most two simulations. The first simulation should contain Scenarios 1-6, described in the original September 30, 2014, report. The second simulation should contain Scenarios 3a, 4a, 5a, and 6a, as provided in the April 24, 2015, report addendum that limited Allatoona Lake's withdrawal to the current contract amount. The re-submittal is basically a simplified packaging of the data that has already been submitted and would not require a new modeling effort.

A copy of this letter will be sent to the following parties: Mr. Tony Able, Section Chief, US Environmental Protection Agency, Region 4, Water Protection Division, Wetlands Regulatory Section, able.tony@epa.gov; Mr. Nap Caldwell, Water Supply Program, Georgia EPD, nap.caldwell@dnr.state.ga.us; and Ms. Andrea Gray, andrea@andreapgray.com.

If you have any questions concerning this matter, please contact Ms. Elisha Bradshaw at (678) 804-5226.

Sincerely,



Edward B. Johnson, Jr.
Chief, Piedmont Branch