



January 11, 2013

Tetra Tech, Inc.  
Attention: ACF-WCM  
61 St. Joseph Street, Suite 550  
Mobile, AL 36602-3521

To Whom It May Concern:

The U.S. Army Corps of Engineers published a notice in the *Federal Register* on October 12, 2012, announcing its solicitation of scoping comments concerning the update of its Water Control Manual for the Apalachicola-Chattahoochee-Flint (“ACF”) River Basin. We are pleased that the Corps is providing this opportunity for input to the process and that it is considering water supply operations in its Manual update, consistent with Eleventh Circuit’s ruling, the Corps’ NEPA obligations, and its June 2012 authority determination.

The Metropolitan North Georgia Water Planning District (“District”) was created by the Georgia General Assembly in 2001 to establish policy, create plans and promote intergovernmental coordination of all water issues in the metropolitan Atlanta area from a regional perspective. As such, the District has an enormous stake in the outcome of the update of the ACF Water Control Manual process.

The primary purpose of the District is to develop regional water resources management plans, which are enforced by the Georgia Environmental Protection Division (“GAEPD”) and used for water resources permitting and state-wide planning purposes. The District’s comprehensive water supply plans were adopted in 2003 and updated in 2009. These plans rely on Lake Lanier and the Chattahoochee River as the primary source of water supply for the District through the 2035 planning horizon.

Given the lack of other economically or environmentally viable alternatives, the District respectfully requests that the Corps considers the full Georgia water supply request when evaluating an expanded range of water supply alternatives associated with the Buford Dam/Lake Lanier project. This analysis should include a full and complete analysis of alternative supply sources available to meet water supply needs within the District, and a robust analysis of shortages to the metro Atlanta area that would result from granting anything less than the full request. In addition, the Corps should perform a complete economic analysis to determine the NED and RED benefits of granting the Georgia request.

The District would ask the Corps to consider operational alternatives and contemplations presented by GAEPD on November 29, 2012 at the technical seminar convened by the U.S. Fish & Wildlife Service (“USFWS”) in Eufala, Alabama. Some of the key considerations that the District would like to see the Corps include in its WCM development include: (1) evaluation of alternative levels for the rule curves and action zones in the ACF projects; (2) reconsideration of its policy of balancing the volume of water stored among the reservoirs based on percent of action zone; (3) reconsideration of Woodruff Dam release requirements, including minimum flows; and (4) the development of forecast-based operating rules which can improve the benefits derived from reservoir operating rules for all purposes.

All potential operational alternatives should be evaluated using a set of basin-wide performance measures that is as complete as possible to demonstrate trade-offs and help ensure that additional gains for one purpose cannot be achieved without substantial impact on other management objectives. We strongly encourage the Corps to focus on development of alternative performance measures which can assess the direct measures of benefits rather than rely on surrogates of impact. This is particularly important for the assessment of benefits and impacts to endangered species and other environmental considerations, including the health of the Apalachicola Bay. In addition, we would ask that specific performance measures be included that can evaluate the performance of various alternatives for water supply in the metro Atlanta area.

The member local governments and utilities of the District realize that we share a common destiny with the entire ACF basin, and desire to work with other basin stakeholders to cooperate and collaborate on how best to share our precious water resources. During the past decade, the metro Atlanta region has become a national leader in water stewardship. The District's Water Supply and Water Conservation Management Plan includes an aggressive water conservation program that includes 19 measures that are implemented by local systems (provided as an attachment to this letter). The Atlanta region is the only major metropolitan area in the country with more than 100 jurisdictions that are implementing such a comprehensive water conservation program. Further, through the District's Wastewater Management Plan, we remain committed to responsible and sustainable water management through the goal of minimizing net consumptive use and maximizing reclaimed water returns back to the ACF basin.

We appreciate the Corps' leadership and management of the ACF River Basin. If you have any questions about this request, please contact me at (770) 443-8110.

Sincerely yours,



Mayor Boyd Austin  
District Chair



The Metropolitan North Georgia Water Planning District (Metro Water District) is a leader in water conservation planning. The Metro Water District's *Water Supply and Water Conservation Management Plan* includes an aggressive water conservation program that includes 19 measures that are implemented by local systems. The Metro Water District is the only major metropolitan area in the country with more than 100 jurisdictions that are implementing such a comprehensive water conservation program.

The following is a list of the 19 water conservation measures required by the Plan. The first 12 measures are described in Section 5 of the 2009 Water Supply and Water Conservation Plan. The most recent measures (13 - 19) were added to the plan as an amendment in December 2010.

1. Conservation pricing
2. Replace older, inefficient plumbing fixtures
3. Pre-rinse spray valve retrofit education program
4. Rain sensor shut-off switches on new irrigation systems
5. Sub-unit meters in new multi-family buildings
6. Assess and reduce water system leakage
7. Residential water audits
8. Low-flow retrofit kits for residential users
9. Commercial water audits
10. Education and public awareness
11. Install high efficiency toilets and high efficiency urinals in government buildings
12. New car washes to recycle water
13. Expedite existing programs to identify and reduce both real and apparent water losses\*
14. Multi-family high efficiency toilet rebate program\*
15. Install meters with point of use leak detection\*
16. Require private fire lines to be metered\*
17. Maintain a water conservation program\*
18. Water waste policy to reduce outdoor water waste
19. High efficiency plumbing fixtures consistent with state legislation

*\*Indicates that implementation of this measure is only required by the water systems that receive their water supply directly from Lake Lanier or the Chattahoochee River; this includes all of the water systems in Cobb, DeKalb, Forsyth, Gwinnett, and Hall Counties and those systems in Fulton County except for the cities of Palmetto, College Park, and East Point.*