

**ATTACHMENT F**

**Responses to Comments from the Georgia Department of Natural Resources,  
Wildlife Resources Division  
Dated May 30, 2006**

Noel Holcomb, Commissioner  
Dan Forster, Director

Georgia Department of Natural Resources  
Wildlife Resources Division

2070 U.S. Highway 278, S.E., Social Circle, Georgia 30025-4711  
(770) 918-6400

May 30, 2006

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C. 20426

Re: Comments on Resource Study Reports  
Morgan Falls Hydroelectric Project No. 2237-013

Dear Secretary Salas:

We appreciate the opportunity to review the Morgan Falls Hydroelectric Project No. 2237-013 Resource Study Reports. In general, the reports addressed the study objectives and methods and did a good job of presenting data and drawing conclusions. Attached you will find specific comments for the Water Resources, Fisheries and Aquatic Resources, and Rare, Threatened, and Endangered Species study reports, and our support of additional studies being requested by the National Park Service.

Thank you again for this opportunity to participate in the FERC licensing process. If you have questions regarding our comments, please contact Chris Martin at 770-918-6418.

Sincerely,

Dan Forster

DF:pw

Attachment

cc: Chuck Coomer, Chief of Fisheries  
Alice Lawrence, USFWS-Athens  
Jim Long, NPS-Atlanta  
Keith Parsons, EPD  
Paul Lamarre, EPD

Georgia Department of Natural Resources  
Wildlife Resources Division  
Comments on Resource Study Reports  
Morgan Falls Hydroelectric Project No. 2237-013

Comments on the Resource Study Reports

**Water Resources**

The Georgia Department of Natural Resources (GADNR) is interested in the effects of operations at Morgan Falls Dam on warming in the impoundment and releases. The study report suggests (page 37) that the influence of warm water moving out of shallow flats into the mainstem impoundment was relatively small in contributing to additional warming of Morgan Falls releases. We feel "relatively small" does not fully answer the question about the contribution of shallow flats to warming and operations at Morgan Falls Dam. Therefore, GADNR requests that the contributions of warming from the shallow flats during dry weekend periods when releases from Buford Dam are contributing little to flows in the impoundment be *quantified*. GADNR feels this can be done using existing data. Therefore, we do not see the need for an additional year of water temperature data collection. We welcome the opportunity to discuss how quantification can be done with the licensee. Quantification of the effects of the operation of Morgan Falls Hydroelectric project on water temperatures in, and downstream of, the project has been of primary concern for GADNR (see Comments on Pre-Application Document and Scoping Document 1 dated May 14, 2004) and will be important in the development of the operating license.

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**Fisheries and Aquatic Resources**

The following comments are for clarification purposes:

On page 12, first paragraph: GADNR no longer manages the river downstream of Morgan Falls Dam as put-grow-and-take. It is now managed as put-and-take and has been stocked with catchable-size rainbow and brown trout only since 2005.

On page 12, third paragraph: GADNR stocked 57,632, 41,256, and 61,366 shoal bass in 2003, 2004, and 2005, respectively.

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**Rare, Threatened, and Endangered Species**

The following comments are for clarification purposes:

*Ichthyomyzon gagei* (southern brook lamprey) is no longer tracked as a Special Concern Species by GADNR, Natural Heritage Program.

The scientific name of the shinyrayed pocketbook has recently been changed. The new name is *Hamiota subangulata* (formerly *Lampsilis subangulata*). If you adopt this change, be sure to do it throughout the report.

Magalie R. Salas  
Page 2 of 2  
May 30, 2006

**Support for Additional Studies**

The National Park Service (NPS) will be requesting three additional studies as a result of new and previously unavailable data. The new data demonstrates that the shoal bass population in Big Creek is suffering from low genetic diversity as a result of isolation resulting from Morgan Falls Dam and its impoundment. The new data also demonstrates that the current operations at Morgan Falls Hydroelectric project impacts aquatic species, particularly the shoal bass population in Big Creek. GADNR requests that NPS proposed studies be given appropriate consideration.

**Responses to Comments from the Georgia Department of Natural Resources,  
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Dated May 30, 2006**

**Response 1.**

As requested Georgia Power also welcomes the opportunity to discuss with Georgia Department of Natural Resources Wildlife Resources Division (WRD) how the contributions of warming from shallow flats during dry weekend periods may be better quantified to address the agency's interests in the effects of Morgan Falls operations on water temperature. Georgia Power has contacted WRD to arrange such a discussion.

The statement WRD cites on page 37 of the Water Resources Study Report refers specifically to the influence of warm water moving out of shallow flats on a dry weekend. However, analysis of water temperature monitoring data presented in the report and in the Study Results Meeting shows that stormwater runoff from the watershed upstream of the project following summer rainfall events was the predominant factor causing warm-water events, potentially exposing stocked trout to higher temperatures (i.e., above 23°C) downstream of the project, and not warming within the impoundment during dry summer weekends. Table 12 of the report shows that temperature maxima recorded at Morgan Falls dam (Station M8) during dry weekends tended to be several degrees cooler than those recorded following rainfall events and typically did not exceed 21.2°C. Also, the analysis on pp 24 & 25 shows that once the warming caused by warm water tributaries is removed, the remaining warming of the river as it passed through the Morgan Falls reservoir appears to be consistent with the natural warming of the cold Buford releases in other segments of the river.

**Response 2.**

Georgia Power appreciates WRD submitting these clarifying comments into the record and will consider the information as appropriate in preparing the license application.

**Response 3.**

Georgia Power has considered and responded to the new study requests made by the National Park Service (NPS). See Georgia Power's responses to the letter from NPS dated May 26, 2006 under Attachment D.

**ATTACHMENT G**

**Responses to Comments from the Chattahoochee Nature Center  
Dated May 30, 2006**

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May 30, 2006

Ms. Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E., Room 1A  
Washington, DC 20426

RE: Georgia Power Company, Morgan Falls Re-licensing, FERC Project No. 2237

Dear Ms. Salas:



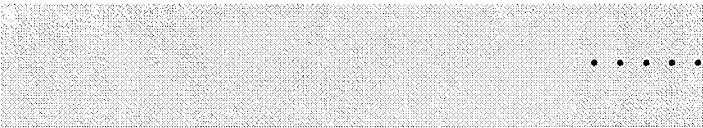
The Chattahoochee Nature Center is pleased to participate in the Morgan Falls Hydropower Project re-licensing endeavor. We view this as an opportunity to continue our longstanding relationship with Georgia Power; Georgia Power has diligently provided us with the progress reports and studies and after reviewing the resource studies report the Chattahoochee Nature Center feels that the report meets the goals of the studies and provide an adequate foundation for licensing decisions made by the Federal Energy Regulatory Commission.

We are looking forward to the upcoming Licensing Proposal Development meetings, and we will be presenting our interests in environmental enhancement through redevelopment of the CNC wetlands boardwalk situated within the Morgan Falls Project. The boardwalk meanders through wetlands and along the Chattahoochee River and is used extensively in many of our environmental education classes we teach throughout the year. Currently the boardwalk is in need of repairs and expansion, and we have recently obtained the Atlanta Regional Commissions approval through the Metropolitan River Protection Act review to proceed with the improvements in order to expand our water quality programming and to have the entire boardwalk ADA compliant.

The Chattahoochee Nature Center supports Georgia Power's proposal to continue current operations for power generation, water supply and wastewater assimilation in the metro Atlanta area.

Sincerely,

Ann Bergstrom  
Chattahoochee Nature Center  
Executive Director



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**Responses to Comments from the Chattahoochee Nature Center  
Dated May 30, 2006**

**Response 1.**

Georgia Power appreciated the Chattahoochee Nature Center's (CNC) interest in environmental enhancement in the Morgan Falls project area and anticipates CNC's continuing involvement in the relicensing process.