



TALL TIMBERS

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is a non-profit,
tax-exempt organization
specializing in
ecological research,
resource management,
conservation & education.
Established in 1958*

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MEMORANDUM

To: Richard Morgan, U.S. Army Corps of Engineers

From: Neil Fleckenstein, Tall Timbers Research Station & Land Conservancy

Subject: November 28, 2006 e-mail

Date: January 2, 2007

cc: Keith Parsons, Georgia Department of Natural Resources
Colonel Mark Held, U.S. Army Corps of Engineers
Thomas Fischer, U.S. Army Corps of Engineers
Carol Bernstein, U.S. Army Corps of Engineers
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In the course of reviewing materials received pursuant to a Freedom of Information Act request, I read an e-mail describing the recent public meeting in Grady County regarding the Tired Creek project. I thought that recipients of that e-mail could benefit from a different perspective. The e-mail in question was sent on November 28, 2006 from Richard Morgan at the U.S. Army Corps of Engineers to Keith Parsons at the Georgia Department of Natural Resources and discussed several issues related to the Tired Creek project.

In the e-mail, Mr. Morgan states that in reference to the November 21, 2006 public meeting in Grady County, "no real opposition was expressed at the meeting." This gives the false impression that there were no speakers voicing serious concerns about this project that evening. On behalf of Tall Timbers Research Station & Land Conservancy, I expressed great concern regarding the absence of water quality analysis in the application. The lack of water quality analysis is disturbing given that: (1) Tired Creek is one of the largest constructed lakes proposed in south Georgia in decades; (2) the potential that constructed lakes have for significantly

affecting water quality, water flow, and habitat**; and (3) the water quality concerns expressed by technical representatives from local, state, and federal agencies and shared with the project consultant in meetings held at Tall Timbers' campus, prior to the submission of the application. (Numerous agencies and organizations that have reviewed the application have expressed similar water quality concerns.)

In my comments, I also expressed concern related to the recent change in the stated purpose of the project and the need for regulatory agencies to consider the direct, indirect, and cumulative impacts of all expected development associated with this project (comments echoed by the U.S. Environmental Protection Agency). Finally, I explained Tall Timbers' concern regarding the accuracy of the wetlands delineation (concerns also expressed by the U.S. Environmental Protection Agency and the Georgia Environmental Protection Division).

Other speakers that evening raised concerns about: the potential for this project to adversely affect water quality in the Ochlockonee River and in Leon County's inter-connected lakes; the impact this project might have on water flow; and how possible intensive development could adversely affect the park and recreational lake that have long been discussed in Grady County.

The concerns expressed by speakers at the meeting should be carefully evaluated. Comment letters submitted by numerous agencies and organizations expressing serious concern regarding many aspects of this project should be given equal consideration. These agencies include the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, the Georgia Environmental Protection Division, the Florida Fish and Wildlife Conservation Commission, the Florida Department of Environmental Protection, the Northwest Florida Water Management District, the Ochlockonee River Soil and Water District, the Georgia Conservancy, the Florida Wildlife Federation, and others.

There is clearly significant public support for the creation of a recreational lake. Given the choice between "having a lake" and "not having a lake," should this be any surprise? However, this project could affect the Ochlockonee River, which is shared by two states, several counties, and many adjacent private landowners. Therefore, it is incumbent that a comprehensive analysis be completed of potential downstream impacts associated with this project. A thorough review of the current application and the substantive comments provided by reviewing agencies at all levels of government, clearly demonstrates that this has not happened.

Thank you for the opportunity to provide another perspective on the November 21, 2006 public meeting.

**University of Georgia River Basin and Policy Center: *Reservoirs in Georgia: Meeting Water Supply Needs While Minimizing Impacts*. 2002.