Department of Energy
Southwestern Power Administration
One West Third Street
Tulsa, Oklahoma 74103-3502

AUG 28 2013

Ms. Dana Coburn
Chief, Environmental Branch
Planning and Environmental Division
U.S. Army Corps of Engineers, Little Rock District
P.O. Box 867
Little Rock, AR 72203

Dear Ms. Coburn,

Thank you for the opportunity to provide input on the draft update to the Table Rock Lake Master Plan dated July 2013 (draft Master Plan) and the draft Environmental Assessment dated July 2013 (draft EA). As the Federal agency responsible for scheduling and marketing the hydroelectric power and energy from the Table Rock project, Southwestern Power Administration (Southwestern) has the following comments on the draft Master Plan and draft EA. Please find Southwestern's specific comments regarding the draft Master Plan and draft EA detailed in the enclosure.

As stated in Southwestern's June 8, 2013, comments on the preliminary draft Master Plan, it is imperative that updates made to the Master Plan not negatively impact hydroelectric power operations at the Table Rock project. Hydroelectric power is one of the two original Congressionally authorized purposes of the project, and Southwestern applies revenues collected each year toward repayment of the U.S. taxpayers' investment, plus interest, in the Table Rock project facilities. The Water Resources Development Act of 1996 (Public Law 104-303, Section 304) that authorized additional project purposes at Table Rock maintained that those additional purposes should not adversely affect the originally authorized project purposes, including power generation. Therefore, other project uses should not receive additional benefits to the detriment of hydroelectric power.

Additionally, as discussed in Chapter 1 Introduction, section f. Pertinent Project Information (pages 1-5 and 1-6), and as shown in Figure 1-1 (page 1-10) of the draft Master Plan, other lake users should be made aware in the Master Plan update that lake levels will fluctuate, sometimes drastically, depending on a variety of factors, including rainfall (or lack thereof), flood control operations, and power demand. The draft Master Plan does an excellent job of making that point. After approval of the Master Plan, developers should continue to be informed of these routine and sometimes significant fluctuations prior to the construction of additional facilities in or around Table Rock Lake.

Finally, Southwestern supports efforts to improve the water quality at Table Rock Lake. In addition to improving recreation and fish habitat, increased water quality has a positive impact on the severity of dissolved oxygen (DO) conditions in the lake, which historically deteriorate during the months of July through November. As a member of the White River DO Committee,

Southwestern participates in the annual development of the Table Rock Operational Action Plan cited in the draft Master Plan and executes voluntary operational management measures to increase the DO concentration in power generation releases. Improved DO in the lake will benefit the downstream trout fishery while allowing Southwestern to maintain operational flexibility at the Table Rock project during the low DO season. Southwestern is pleased with the Corps' inclusion of additional details on operational management measures as well as a brief discussion of the importance of a watershed approach to water quality in Chapter 2.

Southwestern appreciates the many opportunities to provide input for the Master Plan update. If you have any questions or comments, please contact Ashley Corker at (918) 595-6682 or ashley.corker@swpa.gov.

Sincerely,

George Robbins
Director
Division of Resources and Rates

2 Enclosures

cc:
Ted Coombes
Executive Director
Southwestern Power Resources Association

August 29, 2013

Southwestern Power Administration (Southwestern)
Specific Comments on
White River Watershed
Arkansas and Missouri
White River
Table Rock Lake
Draft Master Plan for Development and Management of Table Rock Lake, July 2013
(provided by the U.S. Army Corps of Engineers Little Rock District
for public comment by August 30, 2013)

(Note: Paragraphs are numbered from the beginning of the referenced section or sub-section)

1. Page 1-5, Chapter 1 Introduction, f. Pertinent Project Information, ninth paragraph, fifth sentence. Suggest changing "942 feet m.s.l." to "942 above mean sea level (m.s.l.)" to define m.s.l. in its first instance of use.

2. Page 1-8, Chapter 1 Introduction, TABLE 1-1, Pertinent Data of The Dam and Lake. Suggest labeling "*FC – flood control, P – power*" as Note 1, as that is how it is referenced in General Information, Purpose Stream States.

3. Page 2-3, Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), d. Water Quality, second paragraph, third sentence. The sentence states "Four 50-MW generating units provide approximately 640,000 MWh annually." 640,000 MWh is not a value that Southwestern is familiar with as an average or expected annual energy amount for Table Rock. The estimated annual energy (based on Corps studies, energy production expected under average hydrologic conditions) for Table Rock is 495,000 MWh, and the actual average for the period 1962-2012 has been 502,846 MWh. Southwestern recommends using the estimated annual energy of 495,000 MWh.

4. Page 2-7. Please note that following page 2-7 (containing Figure 2-2), the page number reverts to 2-0 on the next page and incorrect numbering continues for the remaining pages in the chapter. Please correct.

5. Page 2-3 (second instance), Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), h. Resource Analysis (level 1 inventory data), (2) Vegetative Resources, second paragraph, last sentence. Please specify the units for the referenced block of land gained by the Corps in 1999. The draft EA has an identical section on page 4-8 (4.4 Terrestrial Resources and Land Use) that contains two additional sentences after "approximately 3,300." If appropriate, please include the remaining sentences in the draft Master Plan as well.

6. Page 2-7 (second instance), Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), h. Resource Analysis (level 1 inventory data), (5) Ecological Setting, *Terrain*, third sentence. The sentence states

elevations in meters and incorrectly defines m.s.l. as "meters above sea level." Suggest converting to feet above mean sea level to be consistent with the rest of the document and correctly utilize "m.s.l."

7. Page 2-11, Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), j. Demographics, Table 2-3 Race and Ethnicity by State for the Table Rock Lake Zone of Influence, 2010 (percent). The column for Total in ZOI appears to be calculated by taking the average of percents for each individual state, which is incorrect. The total percentage must be weighted by the population for each state. For instance, if 8 out of 10 people (80%) are under age 5 in population A, and 200 out of 1,000 people (20%) in population B are under age 5, the total percentage of people under age 5 in population AB is not 50% (the average of 80% and 20%). The total percentage is 208 out of 1,010 people, which is 20.6%. Please correct the data in the Total in ZOI column, or remove the column from the table.

8. Page 2-12, Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), j. Demographics, Table 2-4 Age and Education by State for the Table Rock Zone of Influence, 2010 (percent). See comment 7 above. Please correct the data for Total in ZOI, or remove the column from the table.

9. Page 2-21, Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), l. Recreation Facilities, Activities, and Needs, (6) Recreation Analysis, Arkansas SCORP Data (2008-2013), first paragraph, fourth sentence. The statement that driving is "still popular as a way to view and enjoy the beauty of the natural landscape" is not consistent with the Recent Poll results provided in Table 2-6 Popular Outdoor Activities, as "driving for pleasure" is not listed. Suggest reviewing the information presented and ensuring accuracy.

10. Page 2-22, Chapter 2 Project Setting and Factors Influencing Management and Development (Existing Conditions), l. Recreation Facilities, Activities, and Needs, (6) Recreation Analysis, Arkansas SCORP Data (2008-2013), second paragraph, first and fourth sentence. Again, the sentences reference "driving" and "interest in driving for pleasure" but that statement is not supported by the Recent Poll results provided in Table 2-6 Popular Outdoor Activities, as "driving for pleasure" is not listed. Suggest reviewing the information presented and ensuring accuracy.

11. Page 6-1, Chapter 6 Special Topics/Issues/Considerations, a. Sedimentation. This section is the only section in the chapter with an alphanumeric reference, i.e. "a." Suggest removing "a." before Sedimentation, or continuing the alphanumeric references throughout the chapter.

12. Page 6 -4, Chapter 6 Special Topics/Issues/Considerations, Water Management and Flood Risk Management, second paragraph, second sentence. Suggest changing "Congress ordered the Corps of Engineers to build" to "Congress authorized the Corps of Engineers to build," since not all projects authorized for the White River basin were actually built.

13. Page 6-5, Chapter 6 Special Topics/Issues/Considerations, Water Management and Flood Risk Management, fourth paragraph, ninth sentence. It appears as though the discussion of Congress authorizing hydroelectric power generation on five of the White River projects should begin a new paragraph. Suggest inserting a space after "…is a risk that each landowner accepts." and beginning a new paragraph with "When Congress instructed the Corps to build…"

14. Page 6-5, Chapter 6 Special Topics/Issues/Considerations, Water Management and Flood Risk Management, fifth paragraph, last sentence. Suggest adding 2012 to the drought years, as is done in the eighth Water Management and Flood Risk Management paragraph, third sentence.

15. Page 6-5, Chapter 6 Special Topics/Issues/Considerations, Water Management and Flood Risk Management, eighth paragraph, first sentence. To clarify the meaning of the sentence and to emphasize that power generation is the primary release method for hydropower projects, suggest modifying the sentence to read "Rainfall amounts and consumer electricity demand are the keys that dictate the releases from a White River dam, which are made primarily through power generation, and, if needed, through spillway gates or conduits."

16. Page 6-6, Chapter 6 Special Topics/Issues/Considerations, Water Management and Flood Risk Management, eighth paragraph, ninth sentence. Suggest modifying the sentence to read "a minimum release requirement to ensure survival of fish species downstream during the warm months."

17. General comment: Several Table and Figure numbers in Chapter 2 are incorrect. For example, there are two Tables 2-4, and while there is a Figure 2-5, there is not a Figure 2-4. Suggest ensuring that Tables and Figures numbers throughout the document are consecutive and not duplicated or skipped.

18. General comment: Many abbreviations are not defined on the first instance of use, and/or are used inconsistently throughout the document. For example, Southwestern Power Administration is first used on page 2-3 (first occurrence), but is not defined as "SWPA" until page 6-6. Suggest ensuring that abbreviations are defined after their first instance of use, and that the abbreviation is used throughout the remainder of the document.

August 29, 2013

Southwestern Power Administration (Southwestern)
Specific Comments on
Draft Environmental Assessment
Draft Master Plan Revision
Table Rock Lake, July 2013
(provided by the U.S. Army Corps of Engineers Little Rock District
for public comment by August 30, 2013)

(Note: Paragraphs are numbered from the beginning of the referenced section or sub-section)

1. Page 2-1, Section 2, Purpose and Need for Action, 2.1 Purpose and Need, first paragraph, fourth sentence. Suggest deleting the word "growth" after population, since it was the actual population, not the population growth rate that increased 14.4% from 2000 to 2012, as supported by data from Table 4.2: Population Trends.

2. Pages 3-3 through 3-5, Section 3, Alternatives. There are several confusing statements and inconsistencies with Table 3.1: Change in Land Classification per Alternatives, which are enumerated below. Please review the data and correct or clarify as needed.

    a. 3.2 Balanced-Use (Alternative 2) – the section states a proposed increase of 2,236 acres to Environmentally Sensitive lands, but Table 3.1 shows 2,237 acres.

    b. 3.4 Maintain High Density (Alternative 2b) – the section states that 74 acres would remain as High Density, as compared to Alternative 2, however the differences between the High Density classifications shown in Table 3.1 for Alternative 2 and 2b is only 14 acres. Please clarify where the additional 60 acres are being reallocated from.

    c. 3.5 No New High Density (Alternative 2c) – the section states that 95 acres, which are under consideration for being converted to High Density in Alternative 2, are kept as Low Density and Environmentally Sensitive in Alternative 2c. However, there is only a 2 acre increase in High Density areas between Alternative 2 and Alternative 1 (no change), so it is unclear where the additional 93 acres are from. Please clarify where the additional 93 acres are being reallocated from.

    d. 3.7 Conservative (Alternative 3) – the section states that the "current" High Density allocation is 1,986 acres. Section 3.1 and Table 3.1 both list the current allocation as 1,984 acres. Please correct the current allocation amount to 1,984 acres. The section also states that all "current" Low Density lands are reclassified to Environmentally Sensitive lands, resulting in a total of 14,146 acres of Environmentally Sensitive lands. While it is clear that land from other classifications must also be reallocated to reach the 14,146 acres, it also appears that these lands are reallocated from the proposed Alternative 2, not the "current"

Alternative 1. Suggest clarifying from which alternative and which categories the additional Environmentally Sensitive lands are reallocated from.

e. 3.8 Extreme Development (Alternative 4) – the section states that 14,146 acres will be allocated to Low Density, however in Table 3.1 it appears that 80 acres are allocated to High Density, with the remaining 14,066 allocated to Low Density. Please correct the statement or Table 3.1 as necessary. Additionally, the section states 4,001 acres of Low Density will require a vegetative management area, which is inconsistent with the 3,915 acres shown in Table 3.1. Please correct the vegetative management area acreage in the section or in Table 3.1 as necessary.

3. Page 4-1, Section 4, Affected Environment, 4.2 Climate, Physiography, Topography, Geology, and Soils, first paragraph, seventh sentence. Suggest removing one instance of the word "average" from the sentence to avoid redundancy.

4. Page 4-5, Section 4, Affected Environment, 4.3 Aquatic Environment, *Water Quality*, first paragraph, first sentence. Suggest rewording the sentence to state: "Table Rock Lake has been listed by the Missouri Department of Natural Resources (MDNR) on Missouri's 303(d) List of impaired waters, approved by the Environmental Protection Agency (EPA), due to excessive nutrient concentrations…" as the 303(d) List is developed by each state according to the Clean Water Act Section 303(d), and submitted to the Environmental Protection Agency (EPA) for approval, and is considered the state's 303(d) List. This is consistent with the wording in the draft Master Plan.

5. Page 4-5, Section 4, Affected Environment, 4.3 Aquatic Environment, *Water Quality*, second paragraph, seventh sentence. Since adding liquid oxygen is only one of many measures taken to increase the dissolved oxygen (DO) concentration in hydropower releases, suggest modifying the sentence to state: "To combat this problem, the dissolved oxygen content is monitored and various management measures are implemented to improve the dissolved oxygen concentration in the hydropower releases." This is consistent with the wording in the draft Master Plan.

6. Pages 4-5 and 4-6, Section 4, Affected Environment, 4.3 Aquatic Environment, *Water Quality*, third and fourth paragraphs. Suggest switching the order of the paragraphs to aid understanding of the low DO season and to be consistent with the draft Master Plan.

7. Page 4-6, Section 4, Affected Environment, 4.3 Aquatic Environment, *Water Quality*. , fourth paragraph, third sentence. The sentence states "Four 50-MW generating units provide approximately 640,000 MWh annually." 640,000 MWh is not a value that Southwestern is familiar with as an average or expected annual energy amount for Table Rock. The estimated annual energy (based on Corps studies, energy production expected under average hydrologic conditions) for Table Rock is 495,000 MWh, and the actual average for the period 1962-2012 has been 502,846 MWh. Southwestern recommends using the estimated annual energy of 495,000 MWh.

8. Pages 4-13 and 4-14, Section 4, Affected Environment, 4.8 Socio Economic Resources. The "Total" data reported for all five counties in Tables 4.3, 4.4 and 4.5 uses incorrect

statistical analysis methods. The total values reported for percentage data (e.g. Average Household Size (owner occupied) in Table 4.3) appear to simply be averages of the county data. A total percentage must be weighted by the population for each county. For example, if 8 out of 10 people (80%) are below the poverty level in population A, and 200 out of 1,000 people (20%) in population B are below the poverty level, the total percentage of people in poverty in population AB is not 50% (the average of 80% and 20%). The total percentage is 208 out of 1,010 people, which is 20.6%. Since the population of each county is relatively similar, this error should not greatly affect the outcome; however, Southwestern recommends using the appropriate analysis techniques or removing the "total" data from the draft EA.

Similarly, the total values reported for median data (e.g. Median Income in Table 4.4) appear to be an average of the median value for the five counties. The correct median income is the middle value of the entire set of data. Even taking the median value, rather than the average, of five other median values will not yield the correct result. It is impossible to know how much this error affects the outcome. Southwestern suggests using appropriate analysis techniques, or removing the "total" data from the draft EA.

9. Page 5-17, Section 5, Environmental Consequences, 5.5 Archaeological and Historical Resources, 5.5.7. Conservation (Alternative 3). Suggest changing "Conservation" in the title of section 5.5.7. to "Conservative" to be consistent with the rest of the document.

10. Page 5-20, Section 5, Environmental Consequences, 5.7 Recreation Resources, 5.7.5. New High Density (Alternative 2c). Suggest changing "New High Density" to "No New High Density" to be consistent with the rest of the document.

11. Page 5-20, Section 5, Environmental Consequences, 5.7 Recreation Resources, 5.7.7. Conservative (Alternative 3), first sentence. Suggest capitalizing Alternative 3 so the sentence reads "Under the Alternative 3…"

12. Page 5-21, Section 5, Environmental Consequences, 5.7 Recreation Resources, 5.7.8. Extreme Development (Alternative 4), third sentence. Suggest inserting a period after "… recreational threat" and beginning a new sentence with "Although this alternative…"

13. Page 5-26, Section 5, Environmental Consequences, 5.10 Aesthetics, 5.10.7. Conservative (Alternative 3), second sentence. Suggest changing "be n hindrance" to "be a hindrance."

14. Page 5-27, Section 5, Environmental Consequences, 5.11 Cumulative Impacts, fourth paragraph, fourth sentence. The sentence states "…habitat and productivity, and will…results in." Suggest removing the "s" on results for verb agreement.

15. General comment: Many abbreviations are not defined on the first instance of use, and/or are used inconsistently throughout the document, and/or are defined multiple times. For example, Southwestern Power Administration is defined twice on page 4-6, and National Ambient Air Quality Standards are defined repeatedly on page 5-21, and PDT is never defined. Suggest ensuring that abbreviations are defined after their first instance of use, and that the abbreviation is used throughout the remainder of the document.

16. Appendix A, Draft Finding of No Significant Impact (FONSI), Alternatives. There are several confusing statements and inconsistencies with draft EA Table 3.1: Change in Land Classification per Alternatives, which are enumerated below. Please review the data and correct or clarify as needed.

    a. Slow Growth Alternative – it appears as though the Low Density acreage increase is referenced from Alternative 2, and not the "current" Alternative 1. Suggest clarifying which alternative(s) is(are) being referenced.

    b. Maintain High Density Alternative – the section states that 74 acres would remain as High Density, as compared to Alternative 2, however the differences between the High Density classifications shown in draft EA Table 3.1 for Alternative 2 and 2b is only 14 acres. Please clarify where the additional 60 acres are being reallocated from.

    c. Conservative Alternative – the section states that 1,914 and 14,138 acres will be allocated to the High and Low Density recreation uses, respectively, while the draft EA Table 3.1 states that there will be 1,906 and 14,146 for each use.

    d. Extreme Development Alternative – the section states that 1,997 and 14,055 acres will be allocated to the High and Low Density recreation uses, respectively, while the draft EA Table 3.1 states that there will be 1,986 and 14,066 for each use.

    e. Preferred Alternative, Balanced Use Alternative - the section states a proposed increase of 2,236 acres to Environmentally Sensitive lands, but draft EA Table 3.1 shows 2,237 acres. Additionally, at the end of the first sentence, the section states that 7,179 acres remains as Low Density recreation, which is inconsistent with draft EA Table 3.1 as well as a statement earlier in the sentence.

17. Appendix A, Draft Finding of No Significant Impact (FONSI), Anticipated Environmental Impacts, first sentence. Suggest adding the words "in" and "it" to the sentence as follows: "**In** consideration of the effects disclosed in the EA, and a finding that they are not significant, **it** is necessary to prepare a FONSI."

18. Appendix A, Draft Finding of No Significant Impact (FONSI), Anticipated Environmental Impacts, Impact Topic 9, first sentence. The sentences states "…areas with known T&E species…was classified…" Suggest changing "was" to "were" for subject-verb agreement.

MISSOURI DEPARTMENT OF CONSERVATION

Headquarters
2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

ROBERT L. ZIEHMER, Director

August 29, 2013

Dana Coburn, Chief
Environmental Branch, Planning and Environmental
U.S. Army Corps of Engineers
Little Rock District
P.O. Box 867
Little Rock, Arkansas 72203

Re: Table Rock Lake Master Plan Revision and Draft Environmental Assessment

Dear Ms. Coburn:

Thank you for the opportunity to review and comment on the Table Rock Lake Master Plan Revision and Draft Environmental Assessment. The Missouri Department of Conservation (Department) has participated in the development of this document since the early stages including attending Focus Group Meetings and providing comments during earlier scoping phases. We look forward to continuing to work with the U.S. Army Corps of Engineers (USACE) on these documents and implementing them once they have been finalized.

The Department is the agency responsible for forest, fish and wildlife resources in Missouri. As such, we actively participate in project review when projects might affect those resources. Our comments and recommendations are for your consideration and are offered to enhance the fish, forest and wildlife resources in the project area.

The Department has reviewed the Master Plan Revision and Draft Environmental Assessment (EA) and would like to thank USACE for considering comments we provided previously and incorporating them into the Master Plan Revision and EA. We support Alternatives that address comments we provided previously (see attached) and that minimize impacts to the forest, fish and wildlife resources of the area. Alternative 2 (Balanced Use) appears to address the Departments previously stated concerns and it increases the acres that are classified as Environmentally Sensitive and Wildlife Management. As such, this alternative supports the Departments mission to protect the forest, fish and wildlife resources of the state and it also supports the continuation of the Departments resource management activities at Table Rock Lake. The Department strongly supports the proposed 50 foot vegetative buffer. This buffer should provide numerous benefits including improved water quality, reduced sedimentation and erosion, and it will preserve the scenic qualities of Table Rock Lake. During high water the vegetation should also create spawning and brood rearing habitat for various fish species and it will provide various benefits to terrestrial resources including providing habitat for wildlife. The Department routinely recommends riparian buffers along the shoreline of lakes and streams because of the many aquatic and terrestrial benefits they provide.

The USACE has done a good job preparing this Master Plan. It appears that the preferred alternative will guide the direction of future management at Table Rock Lake in a way that will benefit a variety of stakeholders and help to protect the forest, fish and wildlife resources in the area.

If you have any questions about these comments, please contact me at (573) 522-4115, Extension 3346 or by email at alan.leary@mdc.mo.gov.

Sincerely,

Alan W. Leary

ALAN W. LEARY
POLICY COORDINATOR

AWL/pb

c: Brian Canaday, Andy Austin, Shane Bush
Attachment

MISSOURI DEPARTMENT OF CONSERVATION

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Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

ROBERT L. ZIEHMER, Director

December 14, 2012

Dana Coburn, Chief
Environmental Branch, Planning and Environmental
U.S. Army Corps of Engineers
Little Rock District
P.O. Box 867
Little Rock, Arkansas 72203

RE: TABLE ROCK LAKE MASTER PLAN REVISION AND ENVIRONMENTAL ASSESSMENT

Dear Ms. Coburn:

Thank you for the opportunity to comment on the Table Rock Lake Master Plan Revision and Environmental Assessment.

The Missouri Department of Conservation (Department) is the agency responsible for fish, forest, and wildlife resources in Missouri. As such, we actively participate in project review when projects might affect those resources. Our comments and recommendations are for your consideration and are offered to enhance the fish, forest and wildlife resources in the project area.

The Department would like the U.S. Army Corps of Engineers to consider the following comments as they revise the Table Rock Lake Master Plan. The Department recommends that the Plan:

- -Provide sustained water intake for the Shepherd of the Hills Hatchery.
- -Identify changing demands for the water resources and identify zones to accommodate authorized uses.
- -Identify measures that will improve water quality in Table Rock Lake, including long-term watershed level Best Management Practices.
- -Identify measures that will improve safety for all users of the Lake.
- -Provide for protection of rare species and their habitats in and around the Lake.
- -Address siltation at the dam.
- -Identify steps to educate the public on invasive species and appropriate measures to limit their spread.

-Prescribe practices to be implemented that will maintain a quality fishery for future generations.

-Provide equal opportunity for multiple uses of the resource (fishing, hunting, boating, wildlife watching, etc.).

-Provide adequate law enforcement.

If you have any questions about these comments, please contact me at (573) 522-4115, Extension 3346 or by email at alan.leary@mdc.mo.gov.

Sincerely,

Alan W. Leary

ALAN W. LEARY
POLICY COORDINATOR

AWL/ck

c: Chris Vitello, Brian Canaday, Andy Austin, Shane Bush, Clint Hale, Mike Allen

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

AUG 30 2013

Ms. Dana Coburn
Chief, Environmental Planning Branch
U.S. Army Corps of Engineers
Little Rock District
P.O. Box 867
Little Rock, AR 72203

Dear Ms. Coburn:

Thank you for providing the U.S. Environmental Protection Agency with the opportunity to review the draft revised Master Plan for Development and Management of Table Rock Lake and the draft Environmental Assessment supporting that Master Plan. As both documents state, the Master Plan is the strategic land use management document that guides the comprehensive management and development of all project resources. Last revised in 1976, the Master Plan is not intended to address the specifics of regional water quality, shoreline management or water level management. These aspects are addressed in the project's shoreline management plan or water management plan. Detailed management and administrative functions are addressed in the projects' Operational Management Plan which implements the concepts of the Master Plan into operational actions. In addition, the Corps implements provisions of the Master Water Control Plan for the White River in managing reservoir pool levels and water releases at each of the reservoirs in the White River system. The EA was prepared in compliance with the National Environmental Policy Act and evaluates existing project conditions and the potential impacts of management alternatives proposed in the Master Plan.

The draft revised Master Plan reflects the Corps' proposed or "preferred action" alternative within the draft EA. This alternative is intended by the Corps to maintain opportunities for high density recreation, reduce low density recreational opportunities by 3%, expand classifications intended to preserve natural areas and classify lands currently unclassified. Although this proposed change from current Land Classifications is an improvement over existing management and represents a first step towards a more sustainable management approach for project lands, it includes only a 3% reduction in the area available for development. With 47% of project lands available for development, existing issues associated with water safety, water quality, aesthetics and recreational quality will likely increase in severity. EPA does strongly support the proposed addition of vegetation management areas, classification of unclassified areas and significant expansion of areas classified for wildlife management and as environmentally sensitive. We recommend that the Master Plan include more of an adaptive management approach to management which is critically dependent upon indicators and metrics of environmental health which will, if monitored, inform the Corps and the public as to whether the current Master Plan and its Land Classifications are maintaining a sustainable, healthy ecosystem and safe water environment.

I have reviewed both the draft revised Master Plan and the draft EA and offer the following comments regarding each document.

Master Plan

Goals and Objectives

The goals and objectives identified in Chapter 3 are qualitative and the Master Plan does not include any quantitative measures against which to determine whether the existing Master Plan is achieving those goals and objectives. In effect, the approach adopted by the Corps of focusing on allocations of project land among Land Classifications has no adaptive management component which would allow the Corps or the public to determine whether future changes to those allocations are necessary. There is no quantitative method of determining whether the Master Plan is appropriate or successful.

Resource Plan

Chapter 5 describes the Corps' proposed resource plan which reflects the proposed or preferred action alternative of the EA.

The proposal identifies that there are no lands classified for mitigation within the entire project, but does not explain this either in the Master Plan or the EA.

Missing from the Master Plan is any targeting of specific locations on project land which are or should be classified for wildlife management or as environmentally sensitive. Plates included within the Master Plan identify classifications for specific locations, but there is no explanation of any rationale for these designations. It seems intuitive that some locations are more suited to high or low density recreation while others are more vulnerable to erosion or contain important wildlife habitat and should be protected by other classifications. Other than depictions on maps, there is no discussion of how the Corps determined or will modify which areas of the project will make-up the 47% of the recreational areas subject to development.

It is not clear how the Master Plan affects or is affected by private residence or developments adjacent to Corps project land, specifically regarding how Land Classification is influenced or limited by these adjacent private lands. In some instances, it appears that the Corps plans to classify areas for low intensity recreation simply because adjacent private land owners are encroaching into project lands.

Although lightly treated within the draft revised Master Plan and the draft EA, it would seem very appropriate to single out specific management actions for the Cow Creek block within the Master Plan as it is largely undeveloped and presents, perhaps, the greatest potential for preserving the 'natural' environment of the project area.

Treatment of Special Topics and Issues Affecting Resource Management

Chapter 6 discusses topics and issues identified during the scoping process or during Master Plan development which affect project resource management.

The Master Plan identifies issues associated with sedimentation in the reservoir, but does not include any specific actions to document areas of excessive sedimentation or actions to address this problem

common to all reservoir systems. The Master Plan should include specific actions the Corps will undertake to define the extent and reduce the impacts of this problem. As development of the project watershed increases in the future, sedimentation-associated water quality problems, habitat losses and reduced recreational opportunities will only worsen. Nitrogen runoff and phosphorous associated with sediment collected within the reservoir from the surrounding watershed will likely pose future water quality, aesthetics (e.g., algal blooms) and public safety (e.g., mycrocystins) challenges to project management.

As the Master Plan states, it is a reasonable expectation that the reservoir will serve as a public water supply in the near future. The Master Plan should have detailed strategies for identifying the most likely locations for water supply intakes and how Land Classification in those adjoining areas supports that future use.

Other than under "Public Outreach," the Master Plan has no specific component to address invasive species introductions or management within the project area. Marine equipment inspections and treatment, plant and seed transport by user vehicles, area monitoring, response protocols and public education should be included in the Master Plan.

The Master Plan identifies boat dock building as a largely unregulated activity and dry boat storage operations as minimally regulated (i.e., Corps policies) within the project area. The impacts on the lake shoreline of docking, marinas and storage facilities are recognized within the Master Plan, but there is no component which provides specific recommendations for managing these actions or controlling their impacts. For example, the Master Plan states that "boat dock companies are still operating on Government property without an official lease or license."

The Master Plan mentions, but does not include any actions to address the encroachment of private landowners onto project lands.

Environmental Assessment

Alternatives

This Chapter is largely ineffective in explaining why specific expansions and reductions in individual Land Classifications under various alternatives are proposed. The description of management

alternatives seems disorganized and is largely anecdotal with little information upon which to compare and contrast them. It is difficult to judge the significance of the changes to Land Classification based solely on this narrative. Table 3.1 provides more comparative information than does the text which follows it. I suggest a much stronger connection between the content of Table 3.1 and the alternative descriptions in Chapter 3. In addition, I was unable to locate Figures 3.1 and 3.2 identified in the introduction to this Chapter.

Table 3.1 would be improved if the references to the vegetation buffer for Alternatives 2, 2A and 4 were presented separately. This information made the table confusing. The formats for Alternatives 2A, 2B, 2C and 2D should match that for Alternative 2. The addition of a second table for just the variations to Alternative 2 might improve this Chapter.

Section 3.1 incorrectly includes "resorts" as low density recreation (p. 3-3, line 12).

There appear to be two fundament levels of evaluation possible regarding alternatives proposed within the EA: comparative total percentage changes in Land Classification and the specific locations within the project area of each Land Classification change. A comparison of Land Classification changes for project area provides a basis for determining whether each alternative emphasizes increasing preservation or increasing public or private use. However, without some criterion against which to apply the allocation of project land among Classifications, the public must rely on its own value judgments of 'best use', i.e., increases in Classifications judged to be 'best use' and decreases in those Classifications individually judged to be less valued. There are no provisions within either document which allow the public to determine which alternative 'mix' would best support a sustainable, natural reservoir environment. In the end, a Master Plan which provides for the maximum amount of use by the public and protects those natural values and benefits which draw the public to the resource in the first place is the goal. Within the draft EA, there is no structure within which to determine which percentages assigned various Land Classifications will result in achieving Master Plan goals and objectives.

Neither the draft revised Master Plan nor the draft EA provide an analysis of which Land Classifications are best suited to which project areas, for example, based on topography, soil type, depth to water table, land cover, proximity to existing development, etc. Whereas the evaluation of Land Classification changes among alternatives can be based on varying percentages of project area within each Classification, there is no information in either document which allows the reader to evaluate whether a specific project location is best suited to one Land Classification or another. The plates for each alternative provided with the draft EA are of not much use for such a determination as they do not speak to those determinations were made.

Environmental Consequences

The Chapter would be improved with a table containing Land Classifications along the left column against Alternatives along the top row.

Table 5-1 contains no useful information primarily because the nexus between percentages of land under one or another Land Classification within each alternative and the impact on the environment is nebulous. Regardless, the table content could be improved with some simplification of the content of each cell. Chapter 8 contains summary information which would make for a better table of alternatives. The description of impacts to physical, biological and cultural resources among alternatives is largely a restatement of the differences in Land Classifications and the affected environment. As previously stated, the association between the differences in Land Classification and impacts on project resources is qualitative and vague. Therefore, the descriptions of environmental consequences in Chapter 5 associated with each alternative, particularly among the variations on Alternative 2, are largely nonspecific, speculative and vague. Regardless, the Chapter could be improved by focusing only on the specific differences between alternatives and the expected impacts on general categories of resources. Perhaps the inclusion or substitution of a matrix of alternatives against resources with a simple 'plus', 'minus' or 'neutral' assignment would be more informative than volumes of narrative.

Thank you, again, for the opportunity to review drafts of these documents. I would also appreciate the opportunity to review the draft revised Shoreline Management Plan when the Corps undertakes that aspect of project planning in the future. If you have any questions regarding these comments, please contact me at 913-551-7441 or shepard.larry@epa.gov.

Sincerely,

Larry Shepard
NEPA Reviewer

MISSOURI
STATE PARKS

August 21, 2013

Mr. Jim Sandberg, Operations Manager
U.S. Army Corps of Engineers
Table Rock Lake Project Office
4600 State Highway 165, Suite A
Branson, MO 65616-8980

Dear Mr. Sandberg:

I understand the U.S. Corps of Engineers is currently accepting comments regarding the draft master plan review for Table Rock Lake. I am writing to express our interest in the Cow Creek and Coombs Ferry properties.

Missouri State Parks is interested in expanding our lease to include the Cow Creek area, and the Coombs Ferry properties for possible future development, and would like to see all or part of the Cow Creek area designated as high density recreation or low density recreation to permit potential trail development and primitive camping. Our professional natural resource stewardship team is excited about the prospects of managing the extensive glades in the Cow Creek area.

Thank you for the opportunity to comment during the master planning process for Table Rock Lake. If you should have any questions, please contact Mrs. Laura Hendrickson, the Ozarks District Supervisor for Southwest Missouri at 417-532-7161. Thank you.

Sincerely,

MISSOURI STATE PARKS

William J. Bryan
Director

WJB: lhl