



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DIVISION, GREAT LAKES AND OHIO RIVER
CORPS OF ENGINEERS
550 MAIN STREET
CINCINNATI, OH 45202

CELRD-RBW

20 July 2018

MEMORANDUM FOR COMMANDER, Pittsburgh District

SUBJECT: Request for Deviation from the Approved Water Control Plan at Berlin Lake, OH

1. Reference:

- a. Request for a planned deviation at Berlin Lake, Ohio, CELRP-EC, dated 05 July 2018.
- b. ER 1110-2-240, Water Control Management, dated 30 May 2016.

2. The proposed deviation delays the drawdown schedule to hold the pool at Berlin Lake, Ohio in the range of 1021-1024 feet (NAVD88) through Labor Day 2018, provided that the downstream minimum flow target is met at Leavittsburg, OH. The purpose of this deviation is to provide extended recreational benefits through later months of the year.

3. The request was reviewed by water management staff at the Great Lakes and Ohio River Division Headquarters (LRD HQ) office and discussed with the Pittsburgh District throughout the process. The deviation for the referenced flood damage reduction project is not approved for the following reasons.

4. Sections 2 and 3 of the deviation request from the District states that stakeholders are requesting Berlin Lake be maintained at maximum summer pool 1024 feet (NAVD88) through July and then draw down to 1021 feet (NAVD88) by Labor Day to provide additional benefit to recreational users of the Lake. The Districts proposed operation is to achieve those pool levels only after downstream minimum flow targets are met at Leavittsburg, OH for water quality purposes. However, there are no supporting details as to whether or how frequently the District proposed operation would meet the objectives of the requesting stakeholders.

5. Sections 5 and 6 of the deviation states that the District anticipates the proposed deviation would negatively impact both flood control and water quality downstream of the project. The request states that water quality conditions along sections of the Mahoning River and other downstream areas would likely be negatively impacted as a result of lower flows from reduced discharges (Section 5.f). The request also notes that maintaining a higher pool elevation through the summer would likely require more aggressive discharges after a rain event in order to recover reduced flood storage (Section 6.e). These aggressive discharges would likely impact stakeholders downstream (Section 6.e). There would also be an increased risk of uncontrolled spill from Lake Milton that would result in downstream flooding (Section 6.f).

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6. A request to deviate from the approved water control plan should be temporary and only be made when necessary to alleviate a critical situation or possibly to realize increased benefits during an operation season without significantly affecting the fulfillment of the projects authorized purposes. The request to change the Berlin Lake guide curve is neither temporary nor does it appear to have no substantial impact on the project's authorized purposes. The deviation request acknowledges that a more comprehensive assessment is required to properly evaluate modifications to reservoir operations. Therefore, the more appropriate course of action is to do a comprehensive assessment that engages all Berlin Lake stakeholders, and if it leads to a recommendation for changed operations, propose a change to the approved water control plan in the Berlin Lake Water Control Manual.

7. If the District plans to conduct a comprehensive watershed assessment of the Mahoning River watershed to properly evaluate feasibility of permanent changes to reservoir operations, it needs to follow the process laid out in ER 1110-2-240 which includes requirements for public participation in accordance with applicable provisions of NEPA and the Water Resources Development Act (WRDA) of 1990.

8. Point of contact for this deviation is Kyle McCune at 513-684-3070.

Encl

1. Request for deviation

STEPHEN G. DURRETT, P.E., SES
Regional Dam Safety officer
Regional Programs Director