

December 5th Revised Draft Comprehensive State-wide Water Management Plan

Responses to Comments Submitted through the Water Council's Website

January 8, 2008

Commenter	Comment	Response
Amanda Lang Georgia citizen	<p><i>12/10/2007 4:40:16 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Unfortunately for Augusta, the foundation of Georgia's long-term water plans is to give the Atlanta region the water it needs to continue growing as one of the nation's major cities. To achieve this end, they devised a way around those other pesky citizens of Georgia who might object to the theft of their local water. Georgia legislators are fashioning a plan to transfer control our local water resources to the state of Georgia at large. New legislation strips water management from local city/county commissions and places it in the hands of 14-member appointed regional Water Councils that will designate how, where, and to whom all of Georgia's water resources will be allocated. Do we really want some powerful board of wealthy partisan political hacks deciding if it's more important for you to have drinking water or some metro Atlanta developer to have a lake for his/her new, upscale gated community? Leave Georgia's water resources in the hands of local elected officials where it belongs. No political appointees period. We do not need or want our water politicized.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Steve Howard Camden County	<p><i>12/11/2007 8:54:35 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Camden County Board of Commissioners urges adequate local government representation to be provided on the regional water planning council. The Board of Commissioners strongly encourage that the draft water plan be revised so that half of the voting members on each regional council are local government officials. We support the ACCG's position on this subject.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.

<p>John S. Quarterman</p>	<p><i>12/11/2007 4:47:31 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The goals seem good. I'm all for measurement and planning. However, putting economy ahead of environment is what has gotten us into repeated droughts, so I'd suggest putting environment ahead of economy. The process seems a bit vague and hard to account for. The regional councils: shouldn't they be required to live in the region? at what date must they be selected? why are so many appointed by the governor? given that agriculture is the state's #1 industry, shouldn't several council members be appointed by the Dept. of Agriculture? Same question for Georgia Forestry? It sounds like the members of these councils are being asked to do a full time or at least half time job. Maybe they should be paid to do it. Maybe the council members and the entire project should be funded out of the general fund, since the results affect everyone in the state. Are these councils a new level of government? If so, why aren't they elected?</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Bob Thomas Elbert County Commission</p>	<p><i>12/12/2007 7:01:21 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Since local elected officials are responsible for implementing the plan, then local elected officials should have at least half of the voting seats in the membership of each of the regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Mark Hooks</p>	<p><i>12/12/2007 8:21:53 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>General Comments The plan is much improved over the original draft. The recognition of septic systems as a long term effective wastewater management tool emphasizes the critical role they play in pollution control and supporting the state's economy. It also aligns the plan with the position of the US Environmental Protection Agency.</p>	<p>This comment does not suggest any further revisions.</p>
<p>Robert P. Jones Pickens County</p>	<p><i>12/12/2007 8:35:34 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I would like to urge the Water Council to guarantee that elected local government officials represent half of the voting membership on each of the regional water planning councils. We fully support the ACCG's position on this subject.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Bruce Widener Ga. Onsite Wastewater Assn.</p>	<p><i>12/12/2007 9:00:01 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Georgia Onsite Wastewater Association (GOWA) comments on Statewide Water Plan December 12, 2007 General Comments GOWA appreciates the changes made to the original draft. The recognition of septic systems as a long term effective wastewater management tool emphasizes the critical role they play in pollution control and supporting the state’s economy. It also aligns the plan with the position of the US Environmental Protection Agency. We do feel, however, that the Plan still needs additional work, particularly in the area of the consumptive use issue as pertaining to onsite wastewater systems. Section 9 Water Return Practices On-site Sewage Management Systems: The current plan correctly recognizes that there is significant scientific debate on the septic system consumptive use subject. University of Georgia soil scientists and hydrologists and US Geological Survey scientists have taken issue with the Plan’s current stance that septic systems are consumptive users of water. There is a growing body of scientific evidence that demonstrates that returns to source waters from septic systems are much more rapid than the plan currently recognizes. In fact some government funded studies have shown the rapid transport of treated wastewater to surface waters (Up to 280 feet per day in the Floridan Aquifer). The septic system industry in Georgia supports further scientific evaluation of the timing of return flows of treated wastewater. In fact, some research shows that in drought periods streams surrounded by septic systems fare better than those with sewer development. It seems that septic systems actually “bank” water that can be called on in times of drought whereas returns from waste treatment plants flow downstream during wet times and is unavailable during dry periods. GOWA would like to see the language concerning septic systems as consumptive users of water completely removed from the Plan. Thank you for your assistance. Oscar Hulett, President Georgia Onsite Wastewater Association (GOWA) Bruce Widener, Executive Director Georgia Onsite Wastewater Association (GOWA)</p>	<p>This comment highlights a management practice that may be considered during regional planning.</p> <p>Section 9 has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources.</p>
<p>Metropolitan North Georgia Water Planning District</p>	<p><i>12/12/2007 9:34:57 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Metropolitan North Georgia Water Planning District (District) is pleased to submit the following comments on the draft Comprehensive Statewide Water Management Plan. The District was created by the Georgia General Assembly in 2001 for the purpose of water supply, wastewater, and watershed</p>	<p>Statements are generally consistent with the approach taken in the current draft.</p>

	<p>planning in the sixteen-county metropolitan Atlanta area. The District adopted three water plans in 2003: (1) Water Supply and Water Conservation Management Plan; (2) Long-term Wastewater Management Plan; and (3) Watershed Management Plan. These plans are being implemented by the local governments in the District area. We appreciate the opportunity to comment on several items in the draft State Water Plan that may impact the District. Future District Plans will be Consistent with the State Water Plan The draft State Water Plan clarifies that all water users in the District must operate (now and in the future) in compliance with all state laws, rules and guidance, including those to be adopted in conjunction with the final State Water Plan. The District recognizes that the water use and availability guidelines used in preparing the 2003 water plans may change in the future as a result of state water planning or other factors. The District's three plans are currently being updated and will be adopted by the District in 2008. The plan updates will build upon and be coordinated with existing efforts being undertaken by District local governments and regional and state governmental agencies, including the State Water Plan. The District has specific statutory planning and implementation requirements different from the requirements for other regions of Georgia as proposed in the draft State Water Plan. The following significant requirements pertain to the District, but not to other regions of Georgia: •District has requirements for watershed/stormwater planning •District has water quality monitoring requirements •District has public awareness and education requirements •District has model ordinance requirements for stormwater management •District has local funding requirements •Local governments must implement the District plans or water permits cannot be issued. EPD audits local governments for compliance with the District plans. It is appropriate that the District's requirements exceed those of other regions of the State. The limited water availability and the potential of water quality impacts mandate that the citizens of the District area excel in water resource management. Complete Funding for regional Water Planning The District strongly supports future state funding for water planning. This funding should be focused in two areas: 1) funding for the Environmental Protection Division for the basin and watershed assessments as proposed in the draft State Water Plan and 2) funding for the proposed regional planning entities. The District urges the Georgia Water Council to work with the Governor and the General Assembly to appropriate complete funding for statewide water planning. Water Conservation and Additional Water Sources Water conservation is a major component of the draft State Water Plan. State leadership on water</p>	
--	--	--

	<p>conservation will help the citizens of the District area continue to improve water conservation, which is an essential element of the District’s water plans. The District supports the water conservation section of the draft State Water Plan. In addition to conservation, the draft State Water Plan should recognize that additional water sources for the metropolitan Atlanta area will be needed in the future. This can best be achieved through new reservoirs which are properly located and designed to minimize environmental impacts and through reallocation of the federal reservoirs for drinking water supply. The District supports the process outlined in the draft State Water Plan where the state will assist regional water planning councils and local governments with drinking water reservoir planning and permitting. Interbasin Transfers O.C.G.A. § 12-5-584 states that the District “shall neither study nor include in any plan any interbasin transfer of water from outside the District area.” However, interbasin transfers of water within the District are permissible. The draft State Water Plan continues this approach with an emphasis on minimizing water losses, including those from interbasin transfers. The District also has a goal of minimizing water losses. The updates to the District water plans will identify steps to minimize losses consistent with water consumptive assessments established by the state. The District’s water plan updates will also evaluate future interbasin transfers within the District using the new criteria established in the State Water Plan. Conclusion In summary, the Metropolitan North Georgia Water Planning District supports the draft State Water Plan and urges the Georgia Water Council to forward it to the General Assembly for ratification.</p>	
<p>Tom E. DuPree Jr. City of Madison</p>	<p><i>12/12/2007 10:59:35 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I strongly urge that at least half of the voting membership on each regional council be elected local officials as they will bear the brunt of responsibility for carrying out any action taken by those councils. It is imperative that authority and responsibility be matched. Thank you.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Don Powers City of Thomson</p>	<p><i>12/12/2007 11:02:01 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>We need to ensure that elected local government officials represent at least half of the voting membership on each of the regional water councils. Local elected officials need a direct voice on decision making that could impact their</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	water supplies. Thanks	
Don Powers City of Thomson	<i>12/12/2007 11:02:09 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i> We need to ensure that elected local government officials represent at least half of the voting membership on each of the regional water councils. Local elected officials need a direct voice on decision making that could impact their water supplies. Thanks	Duplicate comment.
Chris Shannon Water Supervisor	<i>12/12/2007 11:04:09 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i> We feel the elected officials should represent half of the voting membership of the regional water planning council. We hope the Water Council will support this opinion. It is important that the elected officials are on this council.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
David Aldrich City of Hartwell	<i>12/12/2007 11:23:41 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i> The plan should impact all segments equally. I have personally watched as homeowners on wells irrigate their lawns while their neighbors watch in horror wondering if their well will go dry. Those on public water systems are under threat of fines or even disconnection if they were to irrigate. There should be equitability between those on a public system and those on a well because all the water is really waters of the State.	This comment would require statutory change and is beyond the scope of the statewide water plan.
Diane H. Causey City of Coolidge	<i>12/12/2007 11:26:14 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i> The City of Coolidge respectfully requests that elected local government officials represent at least one half of the voting members on each regional water planning council.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Bob Anderson City of Ellaville, GA	<i>12/12/2007 11:26:24 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i> Please remember that Georgia's local elected officials are the closest representatives that ordinary voters have to the government. Because of the	Revised language was added to Section 14 to address the appointment of members to the regional water planning

	<p>relatively small numbers of people voting for them, they are often viewed as not only government officials but also as "real" people. In order to give people a sense that they have a say in such an important issue as a "state water plan", it is important to include those that they feel they have "personally" elected.</p> <p>Thank you, Bob Anderson</p>	councils.
<p>Jill Lacy City of Fort Oglethorpe</p>	<p><i>12/12/2007 11:38:16 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>On behalf of the City of Fort Oglethorpe we urge you to include municipalities on the state water board.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Carl L. Camon City of Ray City</p>	<p><i>12/12/2007 11:45:03 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>It is my opinion that local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public's representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils. Sincerely, Carl L. Camon, M.Ed. Mayor of Ray City</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Milton Futch Board of Commissioners of Candler County</p>	<p><i>12/12/2007 11:48:41 AM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The most recent draft of the statewide Water Plan discloses that local government officials are not guaranteed any seats on the regional Planning Councils. The Board of Commissioners of Candler County believes strongly that elected local government officials should be guaranteed at least 51 percent of the seats on the regional Water Planning Councils. The Board emphatically believes elected local government officials are the closest governmental officials to the people they represent. As a result, if 51 percent of the regional Council seats are occupied by persons elected and held accountable by the</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>people, a better water plan will be developed and plan implementation will be better. Local elected officials will be charged with the responsibility to implement any regional Water Plans developed by these councils. Failure to implement regional Plans will impact local government's ability to obtain EPD water permits and/or GEFA loans. Local government officials are the ones best capable of determining what cost local taxpayers are willing to bare. Furthermore, local governments are charged with protecting public health, safety and welfare of Georgia citizens, the major guiding princible of the Water Plan. Again the Board of Commissioners of Candler County, for reasons cited above, strongly believe that 51 percent of the seats on the regional Water Planning Councils should be made up of elected local government officials.</p>	
<p>Rex A. Millsaps City of Lawrenceville</p>	<p><i>12/12/2007 12:11:22 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments’ ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public’s representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils. The City of Lawrenceville has a major stake in decisions made by the State Water Council and request that we or other local governments in Gwinnett County have representation as voting members on our regional water council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Tray Hicks City of Hartwell</p>	<p><i>12/12/2007 12:14:39 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I have to agree that since local elected officials are responsible for implementing the plan, then local elected officials should have at least half of the voting seats in the membership of each of the regional water planning councils. I want to emphasize that there are other economies to look at outside of the Atlanta arena.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Dennis Bergin City of Lula</p>	<p><i>12/12/2007 12:39:08 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>We urge the State Water Council to ensure that local government officials represent at least half of the voting membership on each of these regional water councils. We have many concerns in this regard, there must be some balance and criteria to membership otherwise the council may become, one-sided, overly political, not responsible to the citizens we all are charged to represent, limited in knowledge and scope of responsibilities.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Tim Downing The City of Holly Springs</p>	<p><i>12/12/2007 12:45:11 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I am writting to request that Municipal elected officials be given voting seats on the regional Water Councils. It is imperative that Cities be given the ability to take an active role in water planning for our region. Without a voting interest in the process our cities futures could be greatly influenced by individuals who were not elected to do so. Thanks for your consideration. Tim Downing</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Richard D. Green City of Hoschton</p>	<p><i>12/12/2007 12:54:44 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Proposed language in the draft State Water Mgt. Plan does not guarantee seats for elected local government officials on the regional Water Councils. The State Water Council should ensure that these officials represent not less then half of the voting membership on each of these Councils since local authorities will be responsible for carrying out the plans that are developed. Failure to implement the regional Plans will directly impact local governments' ability to obtain EPD water permits and GEFA loans. In addition, local governments will be the public's representation on these Councils and they are accountable to the public; have the best knowledge of local water management practices; and understand the impact of costs on local taxpayers.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>John R. Stephens, Jr. City of Maxeys</p>	<p><i>12/12/2007 1:08:23 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>As the Mayor of a small town, I feel that it is imperative that this plan guarantee a minimum of 1/2, but preferably 3/4 of the seats on these regional water councils to locally elected officials. These officials are elected by the</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>people, not appointed by the politicians. They are the ones that have to make any plan work at the local level. The municipality is already overburdened with mandates from those that do not have to answer to the people. I am concerned about the impact of these water boards on the ability of local governments to repay GEFA loans. Representation by ELECTED officials from the LOCAL level must be mandated at a plurality on each of these boards.</p>	
<p>Adolph McLendon City of Richland</p>	<p><i>12/12/2007 1:08:27 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>DUE TO THE NEGATIVE RESPONSIBILITY FALLING UPON LOCAL CITIZENS WHO ELECT LOCAL OFFICIALS TO REPRESENT THEM, THE LOCAL OFFICIALS SHOULD HAVE A SAY SO ON THE COUNCIL. THAT WOULD BENEFIT THE TAXPAYERS BEING PROTECTED FROM THE BURDEN FINANCIALLY ON IMPLEMENTED PLANS. LOCAL OFFICIALS ARE HELD ACCOUNTABLE FOR WATER VIOLATIONS SO THEY SHOULD BE ABLE TO INPUT DECISIONS.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Joseph Macon City of East Point</p>	<p><i>12/12/2007 1:15:13 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I would like to urge the Water Council to guarantee that elected local government officials represent half of the voting membership on each of the regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>James Conley City of Blairsville</p>	<p><i>12/12/2007 1:17:48 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>State Water Council The City of Blairsville would like to urge the State Water Council to make local government officials represent at least half of the voting membership. Local officials are charged with protecting their citizens' public health, safety and welfare and need to be involved in the development of their regional water management plans. Local government needs to be involved in any management practices that will have cost effects on their citizens. Thank You, Jim Conley</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Albert Studstill Lanier County Board Of Comm.</p>	<p><i>12/12/2007 1:22:47 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I think the county and city government should have some member on the</p>	<p>Revised language was added to Section 14 to address the appointment of members to the</p>

	Council. Thank you for considering this .	regional water planning councils.
Patrick W. Eidson City of Centerville	<p><i>12/12/2007 1:33:55 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public's representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Brenda S. Clark City of McRae	<p><i>12/12/2007 1:36:41 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I would like to urge the State Water Council to guarantee that elected local government officials represent at least half of the voting membership on each of the regional water councils, as local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Frank Carl Savannah Riverkeeper	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Comments on December 5, 2007 Water Plan from Frank Carl, Savannah Riverkeeper I applaud EPD and the Water Council for dealing with this controversial but necessary issue. Clean fresh water is quickly becoming our most endangered resource. I commend EPD and the Water Council for retaining water as a public resource, for recognizing that considerable data will need to be gathered (existing), generated and analyzed to create a viable water management system, and for involving the public in the process. A special mention is also called for in the recognition in the most recent plan that planned growth is an essential component of efficient water management. In my recommendations for improvements to the plan</p>	<ul style="list-style-type: none"> • Revised language was added to Section 14 to address the appointment of members to the regional water planning councils. • The water planning regions have been redelineated.

	<p>I have listed my comments roughly in an order that I consider most serious to the viability of the plan and its adoption by the residents of Georgia. Unfortunately, many of the comments cannot be classified into one section or another, so I am submitting them in the Introduction Section. 1. & 2. The two most serious problems are additions into the most recent edition of the plan: The organization roughly along the lines of the RDCs and the appointment of water district councilors by the governor, lieutenant governor and the speaker of the house (pp 77-78). Structuring the water district councils and their geographic areas in this way almost assures that the system will fail. First, it makes the jobs of the district councils very complicated, in most cases dealing with some subpart of three or four different watersheds. That means that they have to communicate both upstream and downstream with other WDCs (water district councils) just to establish the rules within a regional watershed and then they have to communicate with the upstream watershed and the downstream watershed to establish inflows (quantity and quality) and outflows (quantity and quality) for the hydrologically defined watershed. They will have to do all of that three or four times to accommodate all of the subwatersheds in their ill-defined districts. This complexity will discourage local participation as will the fact that one third of the councilors in each WDC they will not be dealing with the watershed that affects them. Can you imagine the interest a councilor from Richmond County will show in Louisville's sewage treatment process? Possibly an even more serious blow to local participation is the total exclusion of local power from the selection of local water district councilors. To create buy-in from local residents, they will have to think that they have some power in the selection of their councilors. Having them selected by the governor and lieutenant governor is bad enough in that it dilutes their capacity to do something about any problem that they might have by a factor of 14. But including the speaker (a person elected by another population) in the selection process is even worse. I propose that the five Basin Advisory Committees be reconvened to determine the boundaries and number of water districts within their basins. Each basin could be given a maximum number for the districts they can choose. Once the ridgeline boundaries are established for the watershed districts, then County Commissions can pick representatives to fill the 18 positions on each WDC. If EPD selects the skills needed on the councils, then the counties will have to pick people to fill those slots with the appropriate skills. Let me give you an example. If the Savannah Ogeechee Basin Advisory Committee decided that the Central Savannah River Water District should consist of the Savannah River basin from Clarks Hill Dam to the mouth of Brier Creek, that district would include all of Columbia, Richmond, and McDuffie Counties, most of Burke County, about half of Screven County and small parts of Warren,</p>	<ul style="list-style-type: none"> • This comment would require statutory change and is beyond the scope of the draft plan. • The provisions of the draft plan, including those regarding agricultural water use, follow the authority established by current statutes. • The draft plan specifies that an assessment of major water users will be an element of the regional water plans; in some regions, power plants will be among the major water users. The comment provides information that will be useful in development of guidance for regional planning, once the statewide plan is adopted. • Language regarding state funding has been added at the end of the section titled <i>Implementation of regional Planning</i>. • The Water Council considered revisions to the
--	---	--

	<p>Jefferson and Jenkins Counties. The following Table shows hypothetical affected populations of those counties and the number of representatives on the Water District Council. County Pop Reps Appointments Richmond 195,000 10.1 1, 7, 8, 11, 12, 14 – 18 Columbia 105,000 5.4 2, 6, 9, 10, 13 McDuffie 22,000 1.1 3 Burke 13,000 0.7 4 Screven 9,000 0.5 5 Jefferson 2,000 0.1 Warren 2,000 0.1 Jenkins 500 0.0 Total 348,500 18</p> <p>Each county commission appoints councilors according to its population in the water district. Appointments begin with the most populous county and proceed through each county until all counties that contribute more than 2.6% of the total population of the district are represented. In this case the 9,000 population contributed by Screven affords them a 0.5 share of a representative, entitling them to appoint one representative. Then appointments proceed backward through the counties for those counties that get more than one representative. In this case only Columbia and Richmond Counties get additional appointments. The appointments then proceed forward, backward, and forward again until only one county remains to appoint councilors. The sequence of appointments is shown under appointments in the table. Since only small populations in Jefferson, Warren, and Jenkins Counties would be affected, they could be represented by one delegate if those counties could agree on one to send. That delegate may or may not be given the right to vote depending on the wishes of a majority of the other delegates. If appointments are developed through a system like this with local input, I think it will go a long way toward providing local buy-in and therefore legislative acceptance. 3. Since the Water Council is asking the legislature to codify the water plan that is being written, it would not be beyond the pale, as the Water Council seems to want us to believe, to ask the legislature to provide the legal framework with related legislation to fuse the Comprehensive Statewide Water Management Plan and the Metro North Georgia Water District over some acceptable time frame. In that framing the Metro District could be divvied up so that it would conform to hydrological flows with the source waters of four of our major rivers incorporated into their appropriate hydrological watersheds. 4. While I agree that agriculture should be given special considerations when it comes to water conservation, I do not think that the second largest user of water should be left out of the conservation plan entirely. It appears that golf courses are maintaining their classification as agriculture in this latest edition of the plan. This is totally unacceptable. Again the legislature could be prevailed upon to correct this travesty. 5. I realize that power generation is covered under industry, but it would be a good idea to let the people of Georgia know that, as Georgia's largest user of water, power generation will be asked (required) to contribute to conservation. It would also be beneficial to mention somewhere in the water management plan that reducing your use of power is tantamount to</p>	<p>interbasin transfer section and ultimately concluded that the permitting criteria proposed in the draft plan, in conjunction with regional water planning, are sufficient to protect the reasonable use of water in donor basins through regulation of interbasin transfers.</p> <ul style="list-style-type: none"> • Nonpoint source pollution control is managed in accordance with current statutes. Can be further addressed during regional planning. • This comment also raises several issues that would require statutory change or are beyond the scope of the draft plan in other ways. Other elements of the comment are in general keeping with the approach taken in the draft plan.
--	---	--

	<p>water conservation since each of us uses three times as much water via power generation as we use directly. 6. Funding for the development of the water plan is ambiguous at best, but even more doubtful is the funding to maintain the increased activity that these water districts will need once they are established. The current plan indicates that funds cannot be raised through permit fees for water use or for wastewater disposal. The Water Council should ask the legislature to provide the legal framework so that funds to support the programs envisioned can be raised from those who benefit most from the resource. We must allow the EPD to raise needed funds via permit fees. 7. Stronger language is needed in the plan in dealing with interbasin transfers. While I am not unalterably opposed to interbasin transfers, I think that receiving basins should be required to demonstrate their need for transfers by demonstrating that they have done everything that can be done to conserve the water they have naturally (a conservation audit). There should also be a provision for compensation from the receiving water districts to the water districts (all that are affected by reduced water supplies) in the donor basin for the water taken. 8. I understand that Water Council members are busy people and that they must ask their employees to fill in for them at some of the less important meetings, but when designees who are neither employees of the Council member nor employees of EPD, but are individuals who have a vested interest in the outcome of the plan, are helping to write the water plan, I think that designation of authority has gone too far. 9. In Section 5 (Water Quality Policy - page 58, column 2) – Implementation Plans: There is no mention here of nonpoint source pollution. Since the majority of pollution is non-point source, it may be difficult to control pollution by adjusting permits unless there will be permits for storm water discharges. Hopefully those are in the pipeline along with requirements to treat urban runoff before it gets to the streams. 10. There are repeated references to assimilative capacity throughout the document. The concept of assimilative capacity assumes that individuals, corporations, or municipalities have a right to pollute our lakes, streams and rivers. I think that no one has a right to abuse our common resource. As a state we are bound to protect our citizens and our resources. To do so adequately we must minimize the abuse of the resource. I argue that assessing a market value for use and pollution of the resource is necessary to retain the public value for water quality and water quantity. For example, everyone is entitled to use the public resource, but if they are going to use significant quantities they will have to obtain a permit which requires measurement of the quantity and quality of the water removed from the resource and the measurement of the quantity and quality of the water returned to the resource. Differences between water taken and water returned will determine the cost for the use of the water. Only in very rare</p>	
--	--	--

	<p>circumstances will differences between water removed and water returned be deemed as improvements. 11. On page 55 of the plan the following statement appears: "To make clear that, so long as water permit holders (i.e., withdrawal and/or discharge) are in compliance with permit conditions that require conformance with Georgia's water quality standards, with the Board of Natural Resources May 2001 instream flow protection strategy (or a superceding instream flow policy adopted by the Board of Natural Resources), and with other permit conditions as set by the EPD Director, activities covered under the water permits will be considered to be consistent with protection of natural systems and biological integrity of the water resources to which the permits apply."</p> <p>Does this passage mean that when permits are not adequate to protect the environment, we must sue EPD rather than the industry? An example might be the Olin mercury contamination of their channel from the plant to the river. Compliance resulted in a RCRA site. Are you sure that you want to say this? It seems to be volunteering taxpayer money to protect industry. 12. In the Savannah River Description on page 36 the following statements appear: "The U.S. EPA, The South Carolina Department of Health and Environmental Control, and the EPD are developing a revised dissolved oxygen standard for the Savannah Harbor that will protect aquatic communities. The Army Corps of Engineers is also studying the harbor and developing strategies to address dissolved oxygen and salinity issues related to deepening the harbor." And "Diadromous fish, such as American shad, hickory shad, blueback herring, Atlantic sturgeon and shortnose sturgeon swim up the Savannah River in the spring to spawn." Both of these statements are disingenuous. The EPA DO TMDL for the harbor does not address the primary actual cause of the depleted oxygen and therefore the approach to solving the problem (since the real problem remains officially unidentified) is unlikely to work and the Corps' contribution to the solution is anemic at best. In the second part of the quote about diadromous fish, no mention is made about the fact that the fish are blocked from getting to their spawning area by the New Savannah Bluffs Dam and the reservoirs upstream which cover significant areas formerly used for spawning. 13. In Section 5 – Water Quality Policy (page 58, column 1) the plan states: "In many areas across the state, however, growth and urbanization of rural lands is happening faster than state and local governments are able to develop and implement the management practices required to minimize non-point source water pollution and maintain assimilative capacity." This failure to plan must be corrected. Adequate Water Management Plans must be in place before development or building permits can be issued. The will and means to enforce the plans must also be present. This is currently lacking in many counties. The legislature must correct this deficiency with adequate funding. 14. In</p>	
--	--	--

	<p>Section 10 – Water Supply – Surface Water Storage (page 67) the plan states: “Full investigation of all reasonable water supply alternatives.” When a watershed is maxxed out like the Savannah for surface water storage, are you prepared to tell developers and politicians that you have all of the water that is available? Efficiency is your only alternative. There is a limit to the water resource. 15. In Section 12 – Water Quality Standards – (page 72) the plan states: “(3) The Board of Natural Resources will consider, upon adoption of this plan, amending its rules and regulations to update water quality standards for bacteria and dissolved oxygen so that the standards are correct and appropriate for different areas of the state.” More specific standards for fecal contamination would be good, but only if the protection remains equivalent. The coliform standard is relatively non-specific but the research indicates that 1 in xxxx swimmers will contract gastrointestinal illness from contact at the current standard. The current data do not include ear, eye, skin or respiratory infections. Escherichia coli is more specific to enteric disease causing bacteria and Enterobacter is even more specific. But neither of them would include potential exposure to ear, eye, skin or respiratory vectors. In addition, if you go to more specific indicators, the standards will have to be lowered accordingly to provide the same protection. For example, if the coliform standard is set so that 1 in 1000 swimmers contracts a gastrointestinal disease if we find 200 cfu/100 mL. We would then have to set the E. coli standard so that 1 in 1000 swimmers would contract gastrointestinal disease at the E. coli standard. Since the E.coli standard is more specific, the number of the standard would have to be lower. If it is 10 times more specific, the standard would have to be 20 cfu/100 mL. That would require concentration of the sample Since a 1.0 mL aliquot that is the normal test volume would contain E. coli in only one of five samples. Enterobacter is even more specific and would likely require the collection and concentration of a larger sample. The literature that I have read on this subject indicates that the conversion to more specific indicator organisms would be used to decrease the protection of the public, i.e. recreational water use. As long as that is not the case, I would have no objection to converting the system to more specific indicators. 16. In Section 9 – Water Return – (page 66) the plan states: “As with on-site sewage management systems, there are considerable information gaps about rates and timing of returns from land application systems. The limited body of work to date suggests that, under some conditions, the lag in returns can be relatively short. More information, however, is clearly needed.” If the LAS returns the water in a relatively short time, it may not be doing its job and should not have been permitted. 17. In Section 13 – Pollutant Trading – (page 76): Pollutant trading provides no benefit to the public or water quality or to the watershed. It is an advantage only to the</p>	
--	---	--

	<p>polluter and therefore should not be considered by an agency whose mission is to protect the environment and by extension the public. 18. In Section 13 – Enhanced Pollution Management – (page 73) the plan says: “The Director will update current compliance inspection and enforcement capabilities and recommend enhancements as appropriate to provide consistent implementation of existing laws and rules and regulations across the State and among local issuing authorities authorized pursuant to O.C.G.A. §12-7-8.” There are several places in the state where the E&S rules are currently ignored. There are also places where EPD is apparently afraid to enforce the law. How do you propose to overcome the political obstacles currently preventing law enforcement? 19. In Section 13 – Enhanced Pollution Management – (page 73) the plan states: “Since environmental compliance is the ultimate goal, regulated entities with a significant record of long-term superior environmental performance should be considered for benefits such as a reduced administrative burden (e.g., less compliance testing and reporting, less frequent inspections) and/or expedited requests for permit changes.” While I do not disagree with the conclusion of the statement, it identifies environmental compliance as the ultimate goal. Compliance is not the ultimate goal, prevention of environmental degradation (often called environmental protection) is the ultimate goal. Standards and compliance with those standards are a means to that end.</p>	
<p>Barbara Kesler City of Arcade</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please be sure that elected local government officials have at least half of the voting membership seats on each of the regional water councils. Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments’ ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public’s representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>William Blount City of Pinehurst</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Elected officials need to be guaranteed at least half of the seats on the regional water planning councils. We are responsible to implement plans and will be directly impacted by the water management plans. Wording</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning</p>

	needs to be revised to give elected officials at least half of the seats on the councils.	councils.
Lori Pruitt City of Cartersville	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please ensure that local elected officials are an integral part of the review and decision making process for the regional plans. Adequate representation allows a voice for all communities that will be affected by the plans, which is critical as it will be local systems that are impacted by the decisions made. At least half of the participants should be selected from local governments. The City of Cartersville, as with other Georgia cities, has an important role and an important stake in the direction the plan takes. Failure to include local community representatives in this process would be an egregious oversight. It is important that all levels of government, most importantly those closest to and in direct and continuing contact with Georgia's citizens, participate in arriving at solutions that fairly and equally address the concerns surrounding Georgia's water resources.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Blan Williams City of Hazelhurst	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>the majority of all voting memberships must be by locally elected officials, they are the ones that this plan affects.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Todd Edwards ACCG	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Comments jointly submitted by: Association County Commissioners of Georgia (ACCG); Georgia Municipal Association (GMA); and Georgia Association of Water Professionals (GAWP). ACCG, GMA and GAWP commend the dedication and hard work of the Water Council and other stakeholders involved in the development of this draft Comprehensive Statewide Water Management Plan. We support the development of this plan, believing it essential in order to guide the state in managing our water resources both now and into the future. We do, however, jointly share one major concern with the proposed make up of the regional water planning councils in the current draft plan and hereby, respectfully, submit language for the Water Council's consideration in addressing this concern (please see Section 14: regional Water Planning, Implementation Actions (3)(c)). Position: ACCG, GMA and GAWP recommend a formula assuring</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.

	<p>local government and water utility participation on regional Water Planning Councils, with at least half of the members of each regional Water Planning Council being made up of elected local government officials. Justification: Local elected officials will answer to the public for the success or failure of regional water plans and must be assured adequate representation on regional planning councils. The current draft Water Plan specifically recognizes that the majority of water management practices are to be implemented by the cities, counties and water/sewer authorities within respective regions. The Water Plan also recognizes that implementing these management practices may have significant public costs and behavior implications. Moreover, failure to implement these management practices will directly impact local government and water/sewer authorities' ability to receive water withdrawal, discharge and stormwater permits from EPD and ability to receive future loans and grants from the Georgia Environmental Facilities Authority for water-related projects – all key components in providing safe and sanitary public water and sewer services. As local governments and water authorities will be charged with implementing most of the Water Plan and subject to sanctions for failing to do so, elected local government officials must be adequately represented on the regional planning councils. This will ensure the planning bodies represent all community stakeholder interests and to provide public accountability on the councils. It will also further serve to guarantee that decisions on water management practices are balanced between the benefits and the costs to taxpayers. Thank you for your time and consideration.</p>	
<p>Anthony Emanuel City of Trenton</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Elected, representative local government officials should have a majority of the voting membership seats on each of the regional water councils since they will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments should be the public's primary representation on these councils since they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Having the responsibility of protecting the safety and health of their constituents and being held directly accountable to them, local governments must have the authority that can come only from their representation on their regional water council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Robert C Johnson</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Oglethorpe County strongly urges the Water Council to guarantee that Elected Local Government Officials represent half of the voting membership on each of the regional Planning Councils. Thank you.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Phyllis Ayers Stephens County Board of Commissioners</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Stephens County Board of Commissioners; Chairman Kenneth Peeples, Vice-Chairman Rex Anderson and Commissioner Harold Andrews urges the Water Council to guarantee that elected local government officials represent half of the voting membership on each of these regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Brian Tolar Georgia Agribusiness Council</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>This section of the plan needs to go on a file of "other information not critical to the development of a statewide water plan." As a participant on the Statewide Advisory Committee, this section simply contains cookbook instructions on how we got from point a to point b, but has no significance in the actual water plan itself. Please separate this section from the real purpose of this process...the actual Comprehensive Statewide Water Management Plan, which starts on page 49. Thank you.</p>	<p>The Water Council will only be sending forth the Comprehensive Statewide Water Plan to the Legislature.</p>
<p>Linda M Tanner Atkinson County Board of Commissioners</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Local elected officials are the voice of the people and definitely need at least 51% of the seats on the regional water planning council since they will be charged with implementing the plan. Atlanta should not be the only consideration. The council should be truly representative of the citizenry.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Bill Torrance City of Vadalìa</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Cities of Georgia represents stake holders along with all governmental agencies within the state. No one can adequately represent the concerns and interest of cities better than elected officials who represent these cities. We, therefore, strongly urge and respectfully request that elected officials from cities in Georgia comprise 50% of the regional Water Council. Cities should not be treated as special interest groups, but rather as partners in the process of managing our water resources.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Phil Sutton Hall County</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Statewide Water Management Plan: Hall County is part of the North Georgia Metro Water Planning District. As such, we would like to encourage the Water Planning District to include more elected officials on the Water Board in order to ensure the views of the citizens are well represented in when water conservation and management issues are addressed.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Southern Alliance for Clean Energy continues to appreciate the tremendous amount of work that has occurred in order to develop Georgia's first statewide water management plan. We are pleased that the latest draft plan continues to recognize water as a public resource and offers ways to better monitor and assess our waterways and to require regional plans. However, these measures must receive proper funding. Southern Alliance for Clean Energy is a non-profit organization that works on energy policy in the Southeast with staff in Atlanta and Savannah and members throughout Georgia who are concerned about water quality issues as well as general environmental concerns. We, along with our members, participated in the numerous public comment opportunities over the past years. We are also an active member of the Georgia Water Coalition (GWC). Our comments on the December version of the draft plan will focus on the energy sector because this is our area of specialty and because the energy sector in Georgia is the highest water user; we will generally defer to the GWC comments on other aspects of the plan. General On December 11, 2007 the Drought Unified Command (DRUC) that consists of GAEPD, GEMA, GEFA, and GDPH stated the following in their press release urging Georgians to save energy in order to save water: Georgia's Drought Response Unified Command (DRUC) encourages Georgians to help save water by conserving electricity. Large amounts of water are required to generate electricity. In Georgia, each kilowatt hour (kWh) of electricity production consumes 1.65 gallons of water according to the National Renewable Energy Laboratory. To put it in context, the average Georgia household's electricity use is 1,148 kilowatt hours per month, requiring 1,894 gallons of water to generate. "One strategy for saving water is to reduce energy consumption," said Georgia Environmental Facilities Authority (GEFA) Executive Director Chris Clark. "Georgians can help the state through this drought by implementing a few practical energy efficiency measures in their homes. Not only will this help conserve water and energy, it will also help lower their utility bills." (See http://www.piersystem.com/go/doc/1619/185714/ for the full release).</p>	<p>The draft plan specifies that an assessment of major water users will be an element of the regional water plans; in some regions, power plants will be among the major water users. The comment provides information that will be useful in development of guidance for regional planning, once the statewide plan is adopted.</p> <p>Several of these comments can also be addressed in the Water Conservation Implementation Plan which is currently under development.</p>

	<p>The latest draft water plan, under Item #8 in the "Guiding Policies" section beginning on page 51, makes an initial statement that acknowledges the water and energy link: "(8) This water plan and subsequent regional Water Development and Conservation Plans will be implemented in coordination with current and future state plans, such as the State Energy Strategy, that may affect water resources." But the water plan does not go much further in terms of energy. As we have stated previously, the Water Council must ensure that the state water plan submitted to the Georgia Legislature addresses the tremendous impacts power plants currently have on our water resources and acknowledges that our future energy choices will make a big difference on the future of the river basins and the communities and businesses reliant on those water resources. The revised draft plan still fails in this regard. The draft plan still does not adequately describe how Georgia's existing energy infrastructure, especially electricity production, negatively impacts water supply sources in terms of degrading water quality and reducing water availability. In the past months, the link between energy and water has come to the forefront at the local, state, regional, and national level due to the intensity of the drought and the effects it is causing on Georgia and our neighboring states. The question of whether our water supplies will be used for power generation over other needs has now been posed. Therefore, Georgia's eventual water plan must integrate energy planning into its goals. Much more needs to be said in this water plan about how water planning in Georgia should directly address our energy system, current and future. Coordination with other plans that may materialize in some way in the future, such as the State Energy Strategy that was issued to Governor Perdue in December of 2006, should of course occur. But we believe, for instance, that the water plan should not wait on the finalization of the State Energy Strategy—or whatever iteration of it that may emerge in the future. Georgia is in the midst of making future energy decisions that will have tremendous impacts on our state's water resources for the long term and there is no reason why the current water plan cannot incorporate more energy-related policies. In spite of the drought, the third draft of the water plan appears to diminish water conservation as a top-tiered, overarching policy goal in comparison to the previous, second revision. This is in direct contrast to the DRUC press release cited at the beginning of our comments. We have sincere concerns about this given that water conservation is generally the quickest, cheapest and most effective way to protect our water resources. Further, the current draft still does not provide recommendations for increasing energy efficiency as a vehicle for obtaining increased water conservation. This is a significant oversight given the inherent water benefits these technologies can provide. Initiatives to advance water conservation through energy efficiency and conservation measures would</p>	
--	--	--

	<p>provide significant, valuable water resource benefits to Georgians. It is imperative that we take steps today to advance both water and energy conservation and efficiency to help our communities of today and of future generations. Therefore, we again ask the Water Council to recommend that the state water plan address the need for significant energy efficiency programs and policy incentives that will help Georgia become more efficient in its energy use. The more efficient we are, the less likely we will need to build large, water intensive power plants that will negatively impact our water quality. Additionally, incorporating sound energy planning policies into state water policy guidelines will provide much needed, system-wide benefits to both the energy and water resources in Georgia. Lastly, the revised draft plan still does not address or discuss climate change and the adverse impacts predicted for our water resources. The Council should be aware that the predicted effects from climate change pose additional and more severe implications for Georgia, especially for Georgia's water resources. Some effects include sea level rise, salt marsh deterioration, more severe and long-lasting droughts, and likely decreases in summer river flows. For more information, please view a 2007 paper presented at the Georgia Water Resources Conference, "Climate Change Implications for Georgia's Water Resources and Energy Future." (See http://www.cleanenergy.org/resources/pubs.cfm.) It also highlights how new energy supply sources proposed for Georgia, such as expanding nuclear power generation at nuclear Plant Vogtle by building up to two new reactors, could reduce water availability in the Savannah River as climate change impacts, such as reduced summer river flow, develop.</p>	
<p>Rudy Kelley City of Stockbridge</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The City of Stockbridge urges the State Water Council to insure that elected local government officials represent at least half of the voting membership on each of these regional water councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>C. Brooks Bailey Pulaski County</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I respectfully request, on behalf of Pulaski County, that elected local government officials represent half of the voting membership on each regional water planning council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Richard VanLandingham City of Cairo</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I am in full agreement that we need proper planning to deal with the drought and water issues facing our state. I also feel it is imperative that elected officials be properly represented on any board or council that will be charged with determining and enforcing any and all such decisions. Elected officials already better understand the proper balance needed to make the best decisions for our communities and counties for the short term as well as the long term. All current enforcement for every state and local law, ordinance, policy etc. is generally under the jurisdiction of local governments to provide enforcement. There is no reason to not allow proper representation from local government on any newly created board that will have jurisdiction over local enforcement of water policies. Proper representation should equal at least 50% of any designated board.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Donald Dye City of Toccoa</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Water Plan as it currently exists seems to have at least one major deficiency, and that is the lack of local buy-in and control. Let me give a specific example: I am the Water Director of a 10,000-meter system. I report to a city manager, who is hired by and serves at the pleasure of a city commission. If the regional Water Councils are not made up of similarly-oriented persons, my manager and my commission may or may not agree with the council, or fail to see its importance, or fail to consider the goals and objectives of the Council vital enough to ensure participation. If the goal is truly to ensure a PLAN and that it is followed, such a buy-in is critical. Therefore, it is my belief that the seats of the regional Water Planning Councils should be required to consist of at least 50% local elected officials. This will ensure that policies derived by the Councils will be actually be both put in place and followed, since the local elected officials will not only understand the limits of their own organizations (and therefore they will know what will actually work), but their presence will also ensure complete transfer of information from the Council to "the real world." Thank you for allowing me the opportunity to provide this input. Don Dye Water Director City of Toccoa 706-886-8451</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Jack A. Connell Gwinnett County</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Gwinnett County supports the concept of a State Water Plan, including creation of regional water planning councils. However, Gwinnett County is opposed to a state water plan which does not ensure that elected city and county officials will hold half of the seats on the regional water planning councils. The State Water Plan expressly provides that its adoption does not change existing law, which includes constitutional Home Rule power</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>granted to county and to municipal elected officials. Elected local governments own the water, sewer and stormwater utilities which provide services and hold the state and federal permits for operation of these utilities. Elected local governments are also accountable to our citizens for the operation of these utilities and for the land use decisions that influence demand for water utility services. Therefore, Gwinnett County supports the changes to the state water plan proposed by the Association of County Commissioners of Georgia to protect the public interest by ensuring that county and municipal governments hold half of the seats on the regional water planning councils. Please feel free to contact me if you have any questions.</p>	
<p>Rose Mary Seymour UGA</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please make at least half of the planning committee local elected officials as this is the group that has to implement the plan and deal directly with consumers. It is imperative that this group have significant representation at the table.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Danielle Rish Town of Carl</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>We feel as though at least half of the voting membership should consist of local elected government officials. Mayor Dave Brock</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Charles Corbin City of Buford</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please consider ensuring that elected local government officials represent at least one half of the voting membership of each of the regional water councils. This was not done for the MNGWPD and has been a problem in getting adequate representation of the cities on critical water resource issues. Allowing cities proper representation on the governing boards of water councils is imperative to the success of the councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Casey Houston City of Grantville</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Urge the State Water Council to ensure that elected local government officials represent at least half of the voting membership on each of these regional water councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Joseph W. Brown Liberty County Board of Commissioners</p>	<p><i>12/12/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>ACCG has taken a position that at least one-half of the seats on each council should be made up of local representation. This only seems prudent given that local governments will be the ones charged with plan implementation. We strongly support ACCG in this stance.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Roy Taylor Cherokee Homeowners</p>	<p><i>12/12/2007 10:09:12 AM OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>The water resources need to remain within the their own basins. To regionally create artificial boundaries that cross many basins is to politicize a natural resource. The health of the water and the ecosystems that support it lies within those basins and they ultimately flow out of the State. Only when we are looking at the basin as a whole will we be able to satisfy our neighboring States and arrive at some sort of resolution to the "water wars" which is one of the driving reasons for this Plan.</p>	<p>The water planning regions have been redelineated.</p>
<p>Michael B. Phillips Appling County</p>	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>As you can see from the dates of the submissions, there has not been much time for the Commissioners to consider what information they want to share, and get it submitted. That being said, the various local Boards of Commissioners and City Councils were voted in, to represent the citizens of the counties and the cities in Georgia. What better representatives can you have? Bulking up this group with special interests will not solve the problem. It has to be dealt with at the local level, so half of the group should be true representatives from the local communities. The County Commissioners and City Councils are just as knowledgeable about the problem (and the solutions) as the people who sit in Atlanta. It is a statewide problem, that will require cooperation among the cities and counties, who should be making these decisions.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Wayne Jackson City of Union Point</p>	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>We feel that at least one-half of the seats on the regional water planning councils should be either elected or appointed local government officials. The local governments will be primarily responsible for carrying out the regional water plans that are developed by these councils. Local government officials understand how and why these plans should be developed.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>This section of the plan also needs to be separated from the actual Comprehensive Statewide Water Management Plan. The overview is filled information that may prove useful to someone writing a book report, but little else. It is 40 pages of opinions and misrepresentative data that simply do not belong in the planning document. The Comprehensive Statewide Water Management Plan can stand on its own, and should, when reviewed by public officials and the general public. Such commentary should be added to the stacks of other documents and public comments submitted in this laborious process.</p>	<p>The Water Council will only be sending forth the Comprehensive Statewide Water Plan to the Legislature.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>The information made available in this section on the energy-water connection was downplayed and even ignored throughout the draft document. In our August 15, 2007 written comments we made several suggestions and it appears that only the items we identified that were actually errors were corrected so we restated our suggestions in our October 30, 2007 comments. For the sake of brevity, we will not repeat them here for a third time but we do request that they again be considered. Please refer to our previous submissions.</p>	<p>Utility water consumption numbers are accurately stated in the overview.</p>
<p>Virginia Holton Packaging Corporation of America</p>	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>I am submitting comments on behalf of Packaging Corporation of America. We participated in the Public Hearing in Valdosta on Dec 10, and submitted written comments at that time. We are not repeating those comments, but supplementing them based on ideas and information that came to our attention at and after the public hearing. 1) We were disappointed to learn that the regional planning district boundaries were changed at the 11th hour. These districts do not represent the river basins for which the stakeholders groups were formed and on which they have been working for 2 years. In fact, some planning districts (the Oconee) cut a river right down the middle. In others (the Chattahoochee) there are three planning districts along its length south of Atlanta, and the Altamaha district covers five river basins! This is unworkable from a water planning and water resource protection perspective! While it may be easier for EPD to administer along current service boundaries, it certainly makes no sense for the Water Plan. We believe it will cause the plan to fail. We oppose this change and recommend that the planning districts, other than the existing Metro Atlanta region, conform as closely as possible to the geologic and hydrologic river basins. 2) The appointed representatives to the regional water councils should all be people with strong ties to that particular</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>planning region, either residing there or having it as their principle place of work, to ensure that they are knowledgeable about and concerned for that district. We also submitted written comments on Oct 30. To the degree that not all the issues with the Water Plan raised in that set of comments have been addressed, we reiterate them again by reference here. We are generally pleased with the progress to date on the Water Plan, with significant improvement in most Sections of the Plan from draft to draft, and with the changes noted above, we believe you will have a workable Plan.</p>	
Jenny Eads	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>I would like to urge the State Water Council to require that local government officials represent at least half of the voting membership on each of the regional water councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
Samuel Untermyer	<p><i>12/12/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Wow, this plan is really great!! I used to live in California, and it was just great to see Silicon Valley and Greater Los Angeles suck the water from the rest of the state, turning everything to dust, like a locust cloud from the Bible!! The whole idea is really great!! Just great!! I'm so totally up for this!! Let's make all of Georgia into the Mojave Desert. What do you think?</p>	<p>This comment does not suggest a revision to the draft plan.</p>
Don Summers	<p><i>12/11/2007 2:24:53 PM SECTION 1: PURPOSE</i></p> <p>The state of Georgia is taking the appropriate steps regarding managing the state's water resources. However, the plan must not require that all planning take place prior to evaluating and developing water projects to assist in the management of water resources in Georgia. Georgia must allow the evaluation and development of new water projects to occur in conjunction or parallel with its planning efforts. This plan must also not discourage innovation or development and implementation of new technology that can be used to assist Georgia in the management of its water resources.</p>	<p>It is the intent of the plan that planning and evaluation take place concurrently.</p>
Terry M. Scarborough	<p><i>12/12/2007 10:57:38 AM SECTION 1: PURPOSE</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>This comment does not suggest a revision to the draft plan.</p>

<p>Brad Carver Hall Booth Smith & Slover</p>	<p><i>12/12/2007 11:50:29 AM SECTION 1: PURPOSE</i></p> <p>Page 51, Guiding Policies, item 2, third sentence, insert "unreasonably" before "foreclose," consistent with othe rlanguage in the plan reflecting reasonable use.</p>	<p>The guiding policy referenced in this comment notes the possibility of detrimental affects on other water users and, so, is consistent with other language in the plan; this change was not made.</p>
<p>Franklin Threatt City Comm. Douglas</p>	<p><i>12/12/2007 SECTION 1: PURPOSE</i></p> <p>I strongly feel that local municipality should have representation on any Statewide Water Management panel. If this is done by regions we should have a voice in the distribution of the water in our area. Thanks for your consideration in this matter. Franklin Threatt</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Ann W. Camp Camp and Company Farms, Inc.</p>	<p><i>12/12/2007 SECTION 1: PURPOSE</i></p> <p>On page 49, paragraph 8 after "Other provisions...or subsequent regional water development and conservation plans." --- It is urgent to many Georgians that a statement be added saying - "The Director will during any such period impose restrictions upon all water users and economic sectors equitably so that the ensuing economic burden is shared and not born by the few. This comment is because the present emergency first placed the total economic burden upon those of us who make our living with the sale of plants and their care. Not until 3 or 4 weeks later did the Governor "request" all users to cut 10%. They had already cut us 100%!!</p> <p>Page 51, Section 1: Purpose - Under "Guiding Policies" Add to #7 regarding information data base -- "All data and decision making information shall be made available to the public in a readily usable format so that citizens can make informed decisions and plans." This comment is necessary so that never again can such a restriction as a "total outdoor watering ban" be a total surprise causing extreme economic distress. Many such as ourselves had "put in" a crop for fall planting and had the mature crop jerked out from under us. We certainly would not have spent the sizable production costs if we had had any "hint" that this restriction was even under consideration. This is a tragedy that did not have to happen.</p> <p>_____ Also a #10 should be added saying "Plans and management shall have the net effect of making conservation measures</p>	<p>This is a drought related comment and beyond the scope of the water plan.</p>

	<p>equal and just to all citizens."</p> <p>Additional comment - there was no comment box for Section 14, regional Water Planning, so I'm entering it here. Implementation Actions, p. 79 under 7) item ix -- Add the statement -- "Water conservation plans shall be applied equally among all water users. Outdoor watering of plants shall be allowed using conservative best management practices. When the Director determines an emergency is imminent or likely, all sectors including indoor business and product production shall be restricted as are outdoor uses." This would help remedy the unjust taking away all production from plant growers.</p>	
Tim Thomas	<p><i>12/12/2007 SECTION 1: PURPOSE</i></p> <p>P. 51 paragraph (5) insert the following ...economic prosperity for the entire spectrum of business and citizens p. 51 paragraph (6) Water use and management including decisions regarding water permits and other specific management plans, shall be implemented in phases as information is acquired and revised as information base improves</p>	This comment is generally consistent with the approach taken in the current draft.
Jeff Bledsoe City of Stockbridge	<p><i>12/12/2007 SECTION 1: PURPOSE</i></p> <p>Not prepared to comment. Received request to comment on the same day as the due date.</p>	
Paul Chappell Georgia Green Industry Association	<p><i>12/10/2007 11:10:52 AM SECTION 2: DEFINITIONS</i></p> <p>I am concerned about how "consumptive use" is understood and defined in the plan, especially in the transference of any meaning that may impact the regulations that come through to the drought management plan. It is perceived that irrigation systems consume and waste enormous amounts of water, when in fact most all irrigation use is returned directly to the ground water table. Unirrigated soils are prone to compaction which makes them impermeable. The use of the phrase "outdoor water usage" (not here, but in the drought plan) needs simply to read "water usage." All consumers need to be assessed under the plan in a way that equally distributes the conservation efforts across multi-industry lines. Let's not single out the green industry as the starting point for conservation measures.</p>	This is a drought related comment and beyond the scope of the water plan.
Wayne King Sr Georgia Green Industry Association	<p><i>12/11/2007 10:56:08 AM SECTION 2: DEFINITIONS</i></p> <p>Urban Agriculture--the application of agriculture sciences in urbanizing areas. This includes Georgia's landscape, nursery, horticulture, and turfgrass</p>	This is a drought related comment and beyond the scope of the water plan.

	industries referred to as the Green Industries. These industries use best management practices in the creation and management of constructed landscapes designed to support and enhance Green Infrastructure and Low Impact Development systems and a sustainable quality of life through mitigation of land altering activity.	
Wayne King Sr Georgia Green Industry Association	<i>12/11/2007 10:59:09 AM SECTION 2: DEFINITIONS</i> Functional Soil and Landscape Systems.--Landscapes that offset impervious surfaces and mimic predevelopment hydrology. These systems simultaneously support plant growth, water retention and infiltration, nutrient and pollutant adsorption, and filtration, and sediment retention	This is a drought related comment and beyond the scope of the water plan.
Wayne King Sr Georgia Green Industry Association	<i>12/11/2007 11:02:15 AM SECTION 2: DEFINITIONS</i> Georgia Certified Landscape & Plant Professional Program: A successfully completed self study course, hands-on practicum, and written exams administered by the Center of Urban Agriculture at the University of Georgia & the Georgia Green Industry Association. Persons completing these programs have been schooled in best management practices relating to Green Infrastructure , Low impact development and plant design in commercial and residential applications.	This is a drought related comment and beyond the scope of the water plan.
Wayne King Sr Georgia Green Industry Association	<i>12/11/2007 11:05:12 AM SECTION 2: DEFINITIONS</i> WaterSense Partner: A certified irrigation system design, installation, maintenance and/or auditing professional who is committed to promoting water efficient landscape watering systems as demonstrated by their participation in WaterSense, a program sponsored by the U.S. Environmental Protection Agency (EPA) that advances the principles and applications of water-efficient irrigation. Such individual has demonstrated professional competency and the ability to assess critical soil/water/plant relationships and resulting impacts on irrigation system efficiency.	This is a drought related comment and beyond the scope of the water plan.
Don Summers	<i>12/11/2007 2:17:19 PM SECTION 2: DEFINITIONS</i> The statewide water plan's definition of reservoir and water supply reservoir should be broadened to include any other vessel, either above or below ground. For example, a "porosity storage reservoir" is an underground storage vessel in an alluvial deposit over an aquiclude that is formed by separating a volume of that alluvial deposit by surrounding it by a man-made substantially	This comment highlights a management practice that may be considered during regional planning. Regional planning provides an opportunity to

	impermeable barrier so that the volume is hydrologically separate for the original surrounding alluvial deposit.	tailor the mix of practices to the specific needs and priorities of each region, and regional plans can and should consider practices beyond those explicitly discussed in the statewide plan.
Terry M. Scarborough	<p><i>12/12/2007 10:57:49 AM SECTION 2: DEFINITIONS</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.
Brad Carver Hall Booth Smith & Slover	<p><i>12/12/2007 SECTION 2: DEFINITIONS</i></p> <p>1) Page 52, Definitions, item 16) "Human use," insert "in Georgia" after "human benefit," consistent with other language in the plan. 2) Page 53, Definitions, insert a new Definition (#35) "State" or "state" means the State of Georgia. 3) Page 53, Definitions, item 44) "Water use," insert 'or "use"' after "Water use," and "in Georgia" after "purposes." (The word "use" is used extensively throughout the plan seemingly synonymously with "water use." Incorporating "use" in this definition will make the meaning consistent throughout the plan. On page 2, under Guiding Policies, "in Georgia" has been inserted in discussions of "Water use," and should likewise be included in the corresponding definitions.) 4) Page 53, Definitions, item 48) "Water users," insert 'or "users," after "Water users," and "in Georgia" after "purposes." (same rationale as previous item).</p>	The plan is not in rule format and is intended to provide a policy framework to guide subsequent rulemaking. The changes suggested here are more consistent with revisions of a rule than a policy document and, so, were not made.
Tim Thoms	<p><i>12/12/2007 SECTION 2: DEFINITIONS</i></p> <p>definition (4) Conservation-oriented rate structure: needs to go further and replace "send a price signal about the marginal cost of additional water" with a stronger statement that pricing structures shall be severely sufficient to discourage non-efficient use of water. definition (5) Consumptive use This definition does not adequately allow for water returned to the ground water source through irrigation and septic tank discharge and later in the document these types of use are looked at in a disparaging manner.</p>	This definition has been revised and the language related to price signal deleted.

<p>Todd Hagemeyer Geosyntec Consultants</p>	<p><i>12/12/2007 SECTION 2: DEFINITIONS</i></p> <p>Definitions 33) and 45) lake, pond, or other vessel New technologies such as porosity storage reservoirs are not a lake or pond. Inserting the word vessel includes this technology in the set of tools for water supply reservoir options.</p>	<p>This comment highlights management practices that may be considered during regional planning. Regional planning provides an opportunity to tailor the mix of practices to the specific needs and priorities of each region, and regional plans can and should consider practices beyond those explicitly discussed in the statewide plan and therefore, the definition were not revised as suggested here.</p>
<p>Bruce Holliday Homeowner</p>	<p><i>12/6/2007 11:33:19 AM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>As a Registerd Landscape Architect for over 30 years, I feel that you have not considered a valuable resource in assisting the landscape installtion public. Because of the required education, experience, and abilities of "Registered Landscape Architcts", the communication and education of the landscape public could drastically influence the overall water conservation efforts of the entire State and Region. The preparation of a landscape plan by a Registered Landscape Architect would greatly enable the average homeowner to install a quality, environmentally sound, and attractive setting for their residence, or business. The quality of this plan and landscape setting would greatly improve the impact over a "pick-up truck landscaper", who has no education or interest in environmental issues. In my experience over the last 30 years, the great majority of "landscapers" are doing a lot to fill our landfills and deplete our water resources. By installing plantings and landscapes that are only in the interest of their profits, with little regard to the "big picture", the homeowner is a vicitm of many years of costly maintenance and watering. Not unlike the jewelry business, a "great" looking landscape is a lot like a "great" looking diamond. Only after being evaluated by a true professional, can the real beauty and value be determined. Please feel free to contact me if I can be of further</p>	<p>This is a drought related comment and beyond the scope of the water plan.</p>

	assistance in achieving an environmental landscape that will be not only beautiful, but sustainable Sincerely, Bruce Holliday cell 678-491-5587	
J E Daniel CEO	<p><i>12/11/2007 7:07:44 PM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>I agree with a policy and restrictive hours. BUT, there is one thing that has consistently bothered me; the hours and days of the week to water or not water, do not take into consideration something very important - religious observance. i.e. in my jurisdiction, one of the few days, if you work, which most people do, to water is on Saturday, the Sabbath. I think a modification of the plan and law needs to reflect that if you are an "even day" person, that if your even day or "odd day" to water falls on your religious observance day, then to water the following day applies. I feel that if this cannot be accomplished, then this plan and "policy" will be in violation of existing federal laws. I shouldn't have to choose between dead tomato plants and/or a "citation". I am sure there are others in my dilemma. Also, in my jurisdiction, for now, we have plenty of water. It also appears that individuals with "ties" to city hall or the county seem to be able to violate these rules with NO repercussions. There needs to be a hotline # setup wherein we bypass local officials. Thank you.</p>	This is a drought related comment and beyond the scope of the water plan.
Terry M. Scarborough	<p><i>12/12/2007 10:57:59 AM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.
Tim Thoms	<p><i>12/12/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>p. 55 paragraph 2 The types and extent of the conditions that can be placed on permits should be limited and reviewable or appealable.</p>	This is an issue for the Board of Natural Resources to be considered in Board rulemaking after adoption of the water plan.
Glenn Page	<p><i>12/12/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Implementation Actions: Water OPERATING permits should also be considered here. As a water wholesaler, we have no jurisdiction over</p>	The current draft provides flexibility for municipal and private water utilities and providers to decide

	<p>management of water that leaves our transmission facilities, yet could be affected, or have some of our customers affected, by mismanagement of resources or non-compliance by another of our customers.</p>	<p>the ways in which they will progress toward water conservation goals and greater water use efficiency, including the practices they will encourage or require among those who purchase water from the withdrawal permit holders.</p>
<p>Wayne King Sr Georgia Green Industry Association</p>	<p><i>12/11/2007 12:57:15 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>Sustainable yield and consumptive use assessment should take into consideration both water quality and quantity benefits that can be derived from functional soil and landscape systems (Green Infrastructure) and water sense programs which contribute to groundwater recharge, water quality and water conservation.</p>	<p>This comment provides information to be considered in the implementation actions that will have to be undertaken once the statewide plan is adopted.</p>
<p>Lindsey Frederick</p>	<p><i>12/11/2007 8:21:01 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>There should be more clarification for outdoor water use for businesses. The exceptions are vague and open for individual interpretation on the local level. There is no information to contact the EPA to get further information regarding what "practices essential to daily business" actually means and what these activities are. What is the difference between a car wash washing cars and a car lot or rental car company using water to wash cars? The process and water usage is the same. Why should we incur the additional expense? If water were such an issue, these businesses should be under the same exclusions. I also wonder as to why Muscogee County falls under this restriction when we do not have any issues with our water supply. Where are the plans for desalination or introducing grey water back into the supplies to improve conditions. If we are to solve this problem, we need to think about more options than just conservation and "revisions".</p>	<p>This is a drought related comment and beyond the scope of the water plan.</p> <p>Grey water and desalination are both management tools that are addressed in the current draft.</p>

<p>Terry M. Scarborough</p>	<p><i>12/11/2007 8:21:01 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>This comment does not suggest a revision to the draft plan.</p>
<p>Harry Jue City of Savannah</p>	<p><i>12/12/2007 11:45:24 AM SECTION 4: WATER QUANTITY POLICY</i></p> <p>The plan also allows use of alternate aquifers as a water quantity management tool. Savannah recognizes that the Lower Floridan aquifer may be a reliable source of water for future water supply needs in the coastal area. However, the strategy is similar to an earlier approach by EPD to develop the Miocene sediments as an alternative or supplemental source of water without any consideration or concern for the same yield of these water bearing units. The century-old development of the Upper Floridan and its consequences are well documented. Therefore it is prudent to give some consideration of safe yields of the Lower Floridan. The emphasis has been its use and effect on the Upper Floridan which has to be considered. Yet little is known about the development of and the long term impacts on the Lower Floridan itself. Will its over-use create other problems? These questions were brought up numerous times by the technical advisory group of the Sound Science Initiative. Therefore it is necessary to conduct the studies as needed before EPD permits additional Lower Floridan wells in the Red Zone on the coast.</p>	<p>This comment provides information that will be useful in development of guidance for regional planning.</p>
<p>Tim Thoms</p>	<p><i>12/12/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>p. 56 How will the Division evaluate applications when the sustainable yield is not yet, and might not be determined for decades? p.60 paragraphs b,c,d The Director or Division should utilize general guidelines that until sufficient science and data are collected particularly in reference to groundwater and the re-charge effect it has on geographic boundaries. This relates back to consumptive use definition comment earlier. paragraph e: on-site sewage management systems particularly septic tanks, by nature of their disposal method, require lower density development and thus lower demand for water use from a particular source. This must be accounted for as well as the lag time or consumptive use for these systems that is continuously referred to elsewhere in the plan.</p>	<p>A guiding policy has been added that addresses the question raised in the first part of this comment. This comment also provides information to be considered in the implementation actions that will have to be undertaken once the statewide plan is adopted.</p>

<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>Under the Water Quantity Policy section, we agree with the emphasis placed on water consumption. However, we do believe that the effects of thermal pollution from power plants and other industrial users, among other impacts, is important to consider, especially in terms of its impact on the assimilative capacity of a water resource, which is related in some capacities to water quantity. We also request that more be done to compile and assess the consumptive water use in a timely manner of Georgia's power plants.</p>	<p>The effects of thermal pollution are handled under current regulations.</p> <p>Consumptive use numbers will be included during the regional planning efforts.</p>
<p>Glenn Page Cobb County - Marietta Water Authority</p>	<p><i>12/12/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>Typos in Paragraph 6 of Background: Therefore, in deciding where and when to apply capital to this task, several VARIABLES must be considered: the functional characteristics of the aquifer, existing evidence of adverse EFFECTS due to withdrawals from the aquifer, and whether forecasts suggest significant increases in demands placed on that aquifer in the years ahead.</p>	<p>Typos corrected</p>
<p>Lisa Leggett DHR Crisp County Health Dept.</p>	<p><i>12/11/2007 9:46:22 AM SECTION 5: WATER QUALITY POLICY</i></p> <p>I work with permitting the On Site Sewage Management Systems and I see situations where a person is on a lot that is served by public water, but they also install a well for irrigation. My concern is that these wells can at times be within the 100' to the drainfields and are installed after the On Site Sewage Management System is installed. It would help to have enforcement that prevents wells like this from being installed and a way to close wells when we see a potential for contamination of the water table. DHR regulations read that smaller lots(.75 acres) must use the public water when it is available, but they do not say that wells are prohibited.</p>	<p>This comment would require statutory change and is beyond the scope of the draft plan.</p>
<p>Lisa Leggett DHR Crisp County Health Dept.</p>	<p><i>12/11/2007 9:46:36 AM SECTION 5: WATER QUALITY POLICY</i></p> <p>I work with permitting the On Site Sewage Management Systems and I see situations where a person is on a lot that is served by public water, but they also install a well for irrigation. My concern is that these wells can at times be within the 100' to the drainfields and are installed after the On Site Sewage Management System is installed. It would help to have enforcement that prevents wells like this from being installed and a way to close wells when we see a potential for contamination of the water table. DHR regulations read that smaller lots(.75 acres) must use the public water when it is available, but they</p>	<p>Duplicate comment</p>

	do not say that wells are prohibited.	
J E Daniel CEO	<p><i>12/11/2007 7:10:46 PM SECTION 5: WATER QUALITY POLICY</i></p> <p>Also, I believe there needs to be hotline setup for slum landlords to be turned in by their tenants. Not now, but in the past, I have had to pay high water bills because unless I hired a lawyer, I couldn't get my landlord to come and fix that "drippy faucet". I think now is a good time to bring a cause action for landlords. However, I feel that Vernon Jones' request to require all "toilets" in his county for re-sale of homes to be "water efficient" is ludicrous. So now I will have to flush 4 times instead of only once if there is a medical condition. That request is ridiculous. As a former facilities manager for large high-rise buildings - that request by Mr. Jones is insane. I hope that state code will be written that will not require this. Thank you.</p>	This comment is beyond the scope of the draft plan.
Terry M. Scarborough	<p><i>12/11/2007 SECTION 5: WATER QUALITY POLICY</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.
Sara Barczak Southern Alliance for Clean Energy	<p><i>12/11/2007 SECTION 5: WATER QUALITY POLICY</i></p> <p>We have concerns about the lack of funding for water quality monitoring across the state and encourage the Council to influence the state legislature on the need for increased funding for overall monitoring of our waterways.</p>	Language regarding state funding has been added at the end of the section titled <i>Implementation of regional Planning</i> .
Terry M. Scarborough	<p><i>12/12/2007 SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.

<p>Paul Chappell Georgia Green Industry Association</p>	<p><i>12/10/2007 11:16:36 AM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Will there be provisions in the plan that will help keep local authorities such as county commissioners and municipal governments from making decisions that will supercede the state plan? The green industry has been hurt more by local uninformed decisions this past year than any of the decisions at the state level.</p>	<p>The plan does provide flexibility for those who hold municipal water withdrawal permit in meeting water conservation goals. Drought responses by local governments, however, are conducted under other authorities and so, are beyond the scope of the draft plan.</p>
<p>Bradley A Hix Georgia Apartment Association</p>	<p><i>12/10/2007 4:35:35 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>On page 58 of the draft, 760-1-1.08 (2) (d) (vi), the clause reads: "Require new multi-family residential buildings to install individual meters or report individual water usage;" Increasingly, new multifamily construction either individually meters each unit or installs submeters behind a master meter. This has been the trend in multifamily development for a decade in Georgia. Many older properties have also installed submeters if the plumbing design permits, and economic allocation methodology when it is not feasible. Any allocation system or formula which results in residents paying for water use reduces consumption. Georgia law recognizes the value of all billing configurations as a way to reduce water consumption. The draft statement on water meters and water usage reporting effectively frames the issues and is a good starting point. It does not require individual meters and does establish a call for consumption data, which will be instructive in the future. As we have contemplated the clause, we reached the following observations: Any requirement for reporting water usage should recognize the unique nature of each property and that usage statistics can take many forms. Many owners or billing providers create in-house data which differs by individual preference. We believe that owners (or their agents) can give local government water providers key information, while avoiding excessive and burdensome reporting. Local water providers already collect and maintain usage data on every property they serve (water through the meter). Rather than place standardized reporting obligations on property owners, we recommend that property owners supply local water</p>	<p>Revisions in the current draft address these comments.</p>

	<p>providers with property configuration information at the time service is established, or annually if necessary. Owners would furnish local water providers with the following uniform property information: Number of units; General common area description; System of water allocation (economic allocation methodology, submetering, hybrid or in rent). Local water authorities are then able to determine water usage statistics as needed. The multifamily industry has responded to increasing water cost and need for conservation as a business decision. Market forces have led property owners to decrease water usage, and these same market forces will continue to move future construction in this direction. In this vein, the language in this statement must clearly affirm that nothing in the clause mandates the installation of individual meters whatsoever. Should the Water Council decide to keep this requirement in the Comprehensive Plan, rather than as part of the statewide water conservation implementation plan (SWCIP), we propose the following amended language: 760-1-1.08 (2) (d) (vi): "New multi-family residential buildings which are not equipped with individual meters shall provide a description of the water billing configuration to local authorities. Nothing herein requires the installation of individual water meters;" The Georgia Apartment Association is a professional organization comprised of over 1600 owners, managers and vendors to Georgia's Apartment industry. Our members own and manage more than 400,000 apartment units throughout the state, providing homes to more than 1 million Georgians.</p>	
<p>Mac Moye Stewart County Commission</p>	<p><i>12/12/2007 10:48:11 AM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>The Stewart County Commission urges the Water Council to assure that half of the voting membership of the regional water planning councils should be made up of elected local government officials. Sincerely, Mac Moye, Stewart County Manager</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Terry M. Scarborough</p>	<p><i>12/12/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>This comment does not suggest a revision to the draft plan.</p>

<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Sections 7-10, General When reading through these sections, it is unclear how the electricity sector will be affected or even whether overall energy use by any sector will be addressed. We propose that these sections, among others, be expanded to include energy efficiency and energy conservation as a necessary and desirable component of a water conservation implementation plan. We recommend that the state water plan address the need for significant energy efficiency programs and policy incentives that will help households and businesses get more mileage out of every kilowatt-hour produced. The more efficient we are with our existing energy resources, the less water will be required to generate electricity. Section 7, Water Quantity Management Practices Under Water Quantity Management Practices, we would like the plan to ensure that future energy supply choices are considered as future water demand forecasts are determined. Given the large reliance our current energy system has on our water resources, future planning must take into account that there are energy options that are less water intensive. We recommend that the 'water quantity management practices' include consideration of energy, not only in terms of energy efficiency and conservation, but also in terms of our energy supply choices. Various cooling technologies can greatly reduce water use at power plants. Further, certain energy supplies, such as traditional coal and nuclear power, are inherently water intensive, especially when compared to clean energy options such as wind, solar, and some forms of bioenergy. Making energy supply choices that consider the amount of water resources required by the proposed technologies should be implemented in the final water plan. We believe that the first priority for implementation must be conservation related water management practices that effectively reduce our water demands. As we have stated, energy efficiency and conservation reduces energy use and reduced energy use results in water savings. Not only can current statewide water conservation requirements can be dramatically enhanced, so can Georgia's efforts to become more energy efficient. Georgia's first energy strategy, developed in 2006, identified as its highest priority that Georgia should aggressively pursue all cost-effective energy efficiency opportunities followed by development of renewable resources. We again refer to a May 2005 study by ICF, Assessment of Energy Efficiency Potential in Georgia, done for the Georgia Environmental Facilities Authority as they began to craft the state's first energy strategy, clearly showed that reducing the amount of water required for cooling at power plants would offer significantly more water</p>	<p>Revisions to the December 5th draft include links to the State Energy Strategy in the guiding policy statements and in the provisions for regional planning.</p> <p>Energy efficiency and energy conservation may be addressed in the water conservation and implementation plan that is currently under development.</p> <p>Energy supply choices may also be addressed during regional planning.</p>
--	---	--

	<p>savings than by water conservation measures implemented by the end-user (e.g. low flow showerheads, among other measures). The study estimated that water use for cooling purposes at power plants could be reduced by 58-224 million gallons per day (mgd) by 2010 versus 3-10 mgd reductions by implementing various efficiency measures to reduce water use by end users. See Table 8 below from the ICF assessment. Substantially more water savings are available from the power sector. (Go to http://www.georgiaenergyplan.org/sup_materials.html to download the full document as it is not possible to include in this online submittal process.)</p>	
Tim Thoms	<p><i>12/12/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>p 61 paragraph (3) This policy practice is absolutely important as it is not currently practiced by all water use sectors.</p>	This statement is consistent with the current draft.
David Ryan	<p><i>12/6/2007 12:26:46 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Grey water recycling must be seriously considered. The technology is there. It is safe. In recent test ther have been more pathogens found from dog feces than from the use of grey water to flush our toilets. New homes over designated square footage and new commercial as well as municipal buildings need to be required to have grey water recycling. Think about the massive amounts of water that could be reused in just our jails and sports arenas. In Texas new homes are exempt from sales tax if they have a grey water recycling system. Grey water recycling reduces the consumption in the average home 30%!! If 1 million homes in the Georgia had grey water recycling to flush their toilets it would save 21 billion gallons of water a year. Plus, some systems can harvest rainwater as well. Sounds good to me!</p>	Grey water is listed as a potential management tool.
Paul Chappell Georgia Green Industry Association	<p><i>12/10/2007 11:26:52 AM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>This section allows for the enforcement of the current rules that regulate "outdoor" water use. This is not acceptable. The current rules target the green industry without mercy. This year alone, more than 14,000 workers in the nursery and landscape business have lost their jobs as a direct result of these rules that have strangled our industry. The plan needs to direct the DNR to re-evaluate those rules.</p>	Outdoor water use rules are defined by the State Drought Plan, which is scheduled for revision in 2008.

<p>Michele Ambler</p>	<p><i>12/10/2007 12:37:10 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The state plan should supercede local regulations & allow outdoor watering at least once a week. Hundreds of municipalities across Georgia are implementing watering restrictions that far exceed the DNR regulations cited in section 2.1.g. They do not take into account the long-term detrimental affect on our air & water quality and increased risks of wildfires if plants are not part of the solution. The urban industry has been the scapegoat for poor leadership at the state and local levels.</p>	<p>This is a drought related comment and beyond the scope of the water plan. Outdoor water use rules are defined by the State Drought Plan, which is scheduled for revision in 2008.</p>
<p>Terry M. Scarborough</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>This comment does not suggest a revision to the draft plan.</p>
<p>Ellen Whitaker Plumbing and Mechanical Association of Georgia</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The Plumbing & Mechanical Association of Georgia, upon reviewing the December 5th, 2007 Revised Draft of Georgia Water Resources: a Blueprint for the Future regarding the "Vision for Comprehensive Statewide Water Planning," would still like to see included a specific reference to the retrofitting of older, inefficient plumbing fixtures in the Water Demand Management Practices Section 8. While we appreciate specific conservation plans will be developed at the regional level, PMA maintains retrofitting should be specifically listed as an Implementation Action. We base our opinion on the following facts: 1) 70 % or over 1 million homes in just the Atlanta area were built before 1993 with older, inefficient plumbing fixtures. This does not include older homes in other areas of the state; 2) 43% of water usage is by single family homes; 3) In an average home, the toilet represents 24% of the household usage, the shower 17%, faucets 11% and leaks 9%; and 4) Savings of 24 MILLION GALLONS per day can be achieved by either replacing or retrofitting these fixtures.</p>	<p>Section 8 Implementation Actions were revised to include a reference to programs to replace or retrofit inefficient plumbing fixtures</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>We are concerned that the importance of water conservation has been reduced in the latest draft of the water plan and request that the language</p>	<p>The Water Council considered additional revisions to the section on</p>

	<p>in this section be changed to reflect the need for aggressive water conservation as a top-tier goal of the plan. For example, the language in the third draft seems to put less emphasis on water conservation as a key tool: Beginning of Section 8, 2nd draft said: The first priority in implementation of water quantity management practices must be conservation-related practices that effectively reduce our current and future water demands. Current statewide water conservation requirements can be dramatically enhanced. The 3rd draft now says: Water conservation is an important tool that will be needed to meet the state's long-term water needs. It is also an important practice to ensure responsible use of a public resource. Under the "Policy: Water Demand Management Practices" listing, the 2nd draft said: (1) Water conservation is an effective and efficient management practice to meet the needs of all water users in the state. The 3rd draft now says: (1) While water conservation alone cannot be expected to fully meet future water needs, water conservation is an effective and efficient management practice to meet some needs for all water users in the state. On page 62, we request that energy efficiency and conservation and alternative energy choices be part of a water conservation plan as required by an applicant for a new or modified water withdrawal permit for non-farm uses.</p>	<p>water conservation and ultimately concluded that the language proposed in the current draft, in conjunction with regional water planning, is appropriate and in keeping with the principles established by the 2004 Comprehensive State-wide Water Management Planning Act.</p>
<p>Tim Thoms</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Background: Current statewide water conservation requirements can(replace with should) be dramatically enhanced... meeting the state's long-term water needs will require greater emphasis on implementation of conservation practices and progress towards enumerated goals that are quantifiably measurable.water conservation implementation plan, provide guidance (and quantify goals and provide incentives for) cost-effective Paragraph 1a: numerical or quantifiable goals... Paragraph 2ii: ...demonstrate, through achievement of measured goals and methods approved by the p 63 paragraph 2ii: Director...unable to demonstrate acceptable results and/or compliance, the Director shall include... paragraph bvii andcvii: Why is outdoor use compliance again referred to if water conservation is going to be equitably practiced by all water use sectors as stated in section 7 paragraph 3 on page 61? Maybe the permittee has developed a better way to conserve water instead of creating an artificial method through outdoor water use schedules? p.64 paragraph g urban agriculture should be included in the definition section and the use of such should be regarded as agricultural in considerations of this Plan.</p>	<p>Statewide water conservation requirements will be addressed in the water conservation and implementation plan. The provisions of the draft plan are intended to provide flexibility for permit holders in meeting water conservation goals.</p> <p>The other issues raised here are defined by current statute and/or rules and are beyond the scope of the water plan.</p>

<p>Rhonda O'Connor Forsyth County</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Water allocation should take into consideration when communities are using planning standards to promote conservation. Greater consideration should be given to communities that implement re-use lines for non-potable needs.</p>	<p>This comment provides information that will be useful in development of guidance for regional planning.</p>
<p>Glenn Page Cobb County-Marietta Water Authority</p>	<p><i>12/10/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Background, Para. 4: Board of Natural Resources should also consider rule-making regarding water OPERATING permits as necessary for attainment of water conservation goals. Some local jurisdictions do not have withdrawal permits, and suppliers to those jurisdictions may not have legal or jurisdictional authority to require water conservation measures. Implementation Actions 2.a. " . . . require applicants for withdrawal OR OPERATING permits. . ." As operating permits do not have quantity limits established, how will EPD monitor this progress? Implementation Actions 2.a.iii.1) These have limited applicability for wholesale-only systems. How will EPD approach consideration of these systems?</p> <p>Implementation Action 2.c. What will be required of wholesale-only withdrawal permit holders?</p>	<p>Operating systems should be addressed in regional planning. Comment will be considered in development of guidance for regional planning</p>
<p>Joseph Gnann SoilWater, Inc.</p>	<p><i>12/11/2007 1:45:39 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>This "consumptive use" theory is incorrect. I'm a professional hydrologist, Georgia Certified Soil Scientist, and biologist with 17 years experience studying groundwater contaminant movement. The only statements I agree with in Section 9 are 1) "the significance of the lag will vary." Yeah - it varies from completely insignificant to imperceptibly significant. and 2) "There are significant information gaps and legitimate scientific debate" about this. Actually, there has not been serious scientific debate about these processes since the 1950s, and any hydrologist would be glad to fill in those gaps for whoever wrote this section. Where in GA are these "soil and geological conditions" where this "so-significant-it-is-consumptive" lag happening? It really does not matter anyway once the systems reach steady state. You should "follow the money" to figure out why these "water myths" are proposed as</p>	<p>Revisions to <i>Section 9: Water Return Management Practices</i> are intended to address this and related comments regarding returns from on-site sewage management systems and land application systems, highlighting in particular variation in the significance of this component of</p>

	<p>public policy. Who would benefit if this nonsense is implemented? Special interest lobbyists for pipe manufacturers, trenching contractors, and especially county and municipal officials who would love all the new revenue from monthly sewer fees would really like everyone to believe this voodoo hydrology come to mind, among others. People could no longer remediate their own wastewater, using a system they paid for and maintain, using free soil biota in their own yard. Please do some research on the hydrologic cycle, the variable source area concept, Darcy's Law, and septic systems and change this section before it's too late, and Georgia has to live with laws based on outdated concepts and ignorance.</p>	<p>consumptive use and the need for more information as well as flexibility in regional planning.</p>
<p>Jim Free GA Onsite Wastewater Assn.</p>	<p><i>12/11/2007 3:36:38 PM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>Infiltrator Systems, Inc. comments on Water Plan December 5, 2007 General Comments Infiltrator Systems, Inc. has been a supplier to the onsite septic industry in Georgia for the past 20 years. We had serious concerns with the first draft of the Statewide Water Plan and appreciate the changes made to the original draft. We feel that the current draft has certainly moved in the right direction. The recognition of septic systems as a long term effective wastewater management tool emphasizes the critical role they play in pollution control and supporting the state's economy. It also aligns the plan with the position of the US Environmental Protection Agency. We do feel, however, that the Plan still needs additional work, particularly in the area of the consumptive use issue as pertaining to onsite wastewater systems. Section 9 Water Return Practices On-site Sewage Management Systems: The current plan acknowledges that there is significant scientific debate on the septic system consumptive use subject. University of Georgia soil scientists and hydrologists and US Geological Survey scientists have taken issue with the Plan's current stance that septic systems are consumptive users of water. There is a growing body of scientific evidence that demonstrates that returns to source waters from septic systems are much more rapid than the plan currently recognizes. In fact some government funded studies have shown the rapid transport of treated wastewater to surface waters. Some research shows that in drought periods streams surrounded by septic systems fare better than those with sewer development. Infiltrator Systems, Inc. asks that the consumptive use language concerning septic systems be removed from the Plan.</p>	<p>This comment highlights a management practice that may be considered during regional planning.</p> <p>Section 9 has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources.</p> <p>Section 9 has also been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources. This comment raises issues that may be considered in guidance for regional planning and during preparation of regional plans.</p>

<p>Mark Hooks</p>	<p><i>12/12/2007 8:24:21 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>Section 9 Water Return Practices On-site Sewage Management Systems: The current plan correctly recognizes that there is significant scientific debate on the septic system consumptive use subject. Several Georgia State University hydrologists and US Geological Survey scientists have taken issue with the plans current stance that septic systems are consumptive users of water. It is premature for the plan to declare that septic systems are consumptive users given the relative lack of consumptive use scientific data. There is a growing body of scientific evidence that demonstrates that returns to source waters from septic systems are much more rapid than the plan currently recognizes. In fact some government funded studies have shown the rapid transport of treated wastewater to surface waters (Up to 280 feet per day in the Floridan Aquifer). Suggested actions: The septic system industry supports further scientific evaluation of the timing of return flows of treated wastewater. This research is crucial to developing a plan that accurately predicts whether consumptive use from septic systems exists, and if so to what extent. This research should be used to develop models to predict whether consumptive uses occur and to what extent they occur with regard to quantity and timing of return flows. Adequate funding should be allocated to gather this information, particularly in the Atlanta Metropolitan region. Implementation Actions, item (1): This section speaks to the Division developing guidance for regional planners. The Division has previously issued guidance to the Metropolitan North Georgia Water Planning District that specified that septic systems are 100 percent consumptive. Suggested action: Base any future Division guidance on regional scientific evaluation of consumptive use. Also, evaluate the consumptive use aspect from sewer exfiltration in a similar manner. Implementation Actions, item (2): This section speaks to adjusting the future use of septic systems as necessary to meet benchmarks for return flows. This section appears to grant the Division a new authority to limit septic systems that does not currently exist under current Georgia law. Therefore it appears to be inconsistent with the law authorizing creation of the plan. Suggested action: If it is the intent of the plan authors to address this issue through the funding and expansion of municipal sewer systems, it should be elaborated on. This will make the intended action clearer to those developing regional water plans. Implementation Actions, item (3): The septic system industry supports the continued regulation of system installation under Department of Human</p>	<p>This comment raises an issue that may be considered in guidance for regional planning and during preparation of regional plans.</p> <p>Section 9 has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources.</p>
-------------------	--	--

	Resources Rule 290-5-26. This program is crucial to assure that systems continue to be sited and installed in a manner that protects the public health and the environment. Suggested action: Retain the existing language.	
Doug Eaves Johnson County	<p><i>12/12/2007 10:59:03 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>In non-surface water source counties the benchmarks for return flow from on-site sewage management systems should be liberally assessed to give credit for the slower return of water from these systems. Care must be given to not stymie growth in these areas by the application of unreasonable restrictions placed on the on-site sewage management systems</p>	<p>This comment raises an issue to be considered in guidance for regional planning and during preparation of regional plans.</p> <p>Section 9 has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources.</p>
Terry M. Scarborough	<p><i>12/12/2007 SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.
Tim Thoms	<p><i>12/12/2007 SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>p. 64 Implementation Actions paragraph (2) same comment regarding consideration of density and demand from water source as it relates to septic systems as was made earlier. Less dense development will require less demand from water source even though there is a lag time in getting water back to that source.</p>	This comment raises an issue to be considered in guidance for regional planning and during preparation of regional plans.
Joseph Gnann SoilWater, Inc.	<p><i>12/12/2007 SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>For those having trouble understanding how septic system water (or stormwater for that matter) can return to the source so quickly: Even though the same exact molecules of water can not travel back to the source (river) through the soil as quickly as it could in a pipe, it simply does not matter in a steady-state system. The hydraulic fluid in any hydraulic system, like a car's brake system, does not travel the length of</p>	This comment raises an issue to be considered in guidance for regional planning and during preparation of regional plans.

	<p>the brake line in order to push the brake mechanism against the pad or drum. Yet fluid does move at the other end of the tube from the brake pedal very quickly, by displacement and hydraulic pressure. Similarly, a stream hydrograph shows a surprisingly quick response to a storm because of similar processes, and is called "piston flow," "throughflow," among other descriptions. Hydrologists of decades ago could not explain the rapid basin response until these concepts were finally understood beginning in the 1930s. A similar volume of water is returned to the basin from a septic system as that flowing from it into the soil. Septic systems reach steady-state within a few days to a few weeks at most after being put into service.</p> <p>I've lost 3 long pieces of detailed comments in cyberspace using this darned web form! Over 3 hours "down the drain."</p>	Section 9 has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources.
Glenn Page Cobb County-Marietta Water Authority	<p><i>12/12/2007 SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>Policy: There is an opportunity here to refer to "indirect potable reuse" and encourage returns to the source when feasible through requiring such returns, or requiring the study of feasibility of making returns, for additional water withdrawal permitting.</p>	This comment highlights a management practice that may be considered during regional planning.
james scarbrough gwinnett water resources	<p><i>12/12/2007 8:23:10 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Interbasin transfer is a fact of life for local governments that are located on the subcontinental divide. Let's not make existing, long standing infrastructure investments that have bonding debt obsolete.</p>	This comment is in keeping with the approach taken in the current draft.
Terry M. Scarborough	<p><i>12/12/2007 8:23:10 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	This comment does not suggest a revision to the draft plan.
Harry Jue City of Savannah	<p><i>12/12/2007 11:49:51 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Although under current state law any ASR well is prohibited in the coastal zone until the year 2009 the plan recognizes that ASR may be a management</p>	This comment is in keeping with the approach taken in the current draft.

	<p>tool to consider. There is no doubt that there may be legislation to allow this use. The City of Savannah does not support the use of ASR in aquifers of high quality water. If used, ASR wells should be drilled in aquifers of low quality water.</p>	
<p>Brad Carver Hall Booth Smith & Slover</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>1) Page 68, Section 10, Water Supply Management Practices, Surface Water Storage, Implementation Actions, item (3)b.ii., insert "per capita" before demand. (Conservation measures may not effectively reduce TOTAL water demand considering population growth, etc., but most certainly should reduce per capita demand.) 2) 16. Page 68, Section 10, Water Supply Management Practices, Surface Water Storage, Implementation Actions, item (3) d., insert "within the State of Georgia" after "watershed." (Jurisdictions within the watershed, but not in Georgia, cannot be subjected to Georgia regulation or requirements.) 3) Page 68, Section 10, Water Supply Management Practices, Interbasin Transfers, Implementation Actions, item (2), insert "in Georgia" after "transfers." 4) Page 69, Section 10, Water Supply Management Practices, Interbasin Transfers, Implementation Actions, item (2) c. i., change "he" to "The." 5) Page 69, Section 10, Water Supply Management Practices, Interbasin Transfers, Implementation Actions, item (2) c. iii., insert "applicable" before "requirements," and "regulatory" before "authority."</p>	<p>The plan is not in rule format and is intended to provide a policy framework to guide subsequent rulemaking. Some of the changes suggested here are more consistent with revisions to a rule and, so, were not made. This comment also raises language to be considered in implementation actions once the plan is adopted.</p>
<p>Frank Carl Savannah Riverkeeper</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>While I have no objection to the shipment of kaolin as a slurry when our water resources are adequate, I think that writing a blanket exemption into the plan for a specific industry is fraught with more possibilities for abuse than is the problem that at some future date some rogue EDP Director will interpret the plan to include kaolin shipments as interbasin transfers. In my opinion the exemption is totally unnecessary and presents greater possibilities for abuse of the exemption by the industry than there is for abuse by the EPD Director.</p>	<p>The Water Council considered additional revisions to the interbasin transfer section and ultimately concluded that the language proposed in the draft plan, is sufficient to protect the reasonable use of water in donor basins and receiving basins.</p>

<p>Don Summers</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Contained within the Intrabasin Transfers subsection, under the title Policy: Intrabasin Transfers paragraph (2) the following comment is made. In this subsection, intrabasin transfers that cross more than for counties, shall not be permitted until consumptive use assessments are completed and water development and conservation plans are completed. While there is no reasoning why four counties was chosen as the maximum distance for an intrabasin transfer, beneficial reuse of water from utilized from other basins should be excluded from the consumptive use and development and conservation plan requirements. This is important to encourage the immediate development and implementation of projects dedicated to the beneficial reuse of water. I suggest the following language change to paragraph (2): (2) Intrabasin transfers may continue to be undertaken to meet such practical water needs as are necessary for a water provider to meet the reasonable needs of users within its service area. If such a new intrabasin transfer is to cross the jurisdictional boundaries of more than four counties, it shall not be permitted until consumptive use assessments have been completed for the affected water sources pursuant to section 6 of the plan, and water development and conservation plans, which identify the need for such transfers, have been completed for the affected water planning regions pursuant to section 14 of the plan, except for new intrabasin transfers that beneficially reuse water from a 'donor' basin.</p>	<p>The Water Council considered revisions to the intrabasin transfer section and ultimately concluded that the language proposed in the draft plan is appropriate to protect the reasonable use of water in donor basins and receiving basins.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>On page 67, we request that regional water planning be required to look at energy efficiency and conservation and alternative energy choices as areas where water supply savings could be made.</p>	<p>The current draft includes a link to the State Energy Strategy, which addresses energy efficiency among other topics, in the principal elements of regional water plans.</p>
<p>Tim Thoms</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>p. 69 Implemenation actions paragraph 1 should allow for interbasin transfers in times of emergency that imperil the ability to maintain health and welfare of the public. Such emergency transfers would nto be subject ot the requirements.</p>	<p>The water plan will be implemented in conjunction with the statutes and regulations that guide responses to drought and emergency circumstances, which allow the type of response recommended here.</p>

<p>Gary Black</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>With regard to intrabasin transfers, we are encouraged by the progress of the water plan to insert language that limits these transfers to four counties while other water management plans are more fully developed, including consumptive use assessments. Establishing such parameters for intrabasin transfers is a marked improvement over the current status of having no such stated limits.</p>	<p>This statement is generally consistent with the approach taken in the current draft.</p>
<p>Todd Hagemeyer Geosyntec Consultants</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Bottom of page 69, Intrabasin Policy (2)...plan, except for new intrabasin transfers that beneficially reuse water from a donor basin. The restriction of a four county transfer of water within the same basin may severely restrict the options available to fringe counties outside of the 16 county MNGWPD from access to viable water supply.</p>	<p>The restriction on intrabasin transfers is limited to the time required for completion of consumptive use assessments and regional water development and conservation plans. Once completed, the assessments and regional plans will support more informed decision making about proposed transfers, including those into the areas referenced in the comment.</p>
<p>Glenn Page Cobb County-Marietta Water Authority</p>	<p><i>12/12/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Intrabasin Transfer Policy: 2. 4-county rule is arbitrary, and may create conflicts in regional planning process.</p>	<p>The restriction on intrabasin transfers is limited to the time required for completion of consumptive use assessments and regional water development and conservation plans. Once completed, the assessments and regional plans will support more informed decision making about proposed transfers.</p>

<p>Terry M. Scarborough</p>	<p><i>12/12/2007 SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>Duplicate comment; see preceding response.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>As we have stated previously, our energy supply choices along with our energy use rates, can negatively impact water quality and increase pollution that affects our water resources. Where applicable, energy efficiency and conservation, along with clean energy supplies should be considered as ways to improve water quality or reduce pollution.</p>	<p>This comment raises an issue to be considered in guidance for regional planning and during preparation of regional plans.</p>
<p>james scarbrough gwinnett water resources</p>	<p><i>12/12/2007 8:29:53 AM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>Bacteria water quality standards must be based on science and be able to distinguish between natural background and other causes that are correctable to avoid wasting valuable resources trying to correct perceived problems that occur naturally.</p>	<p>This comment is generally consistent with the approach taken in the current draft.</p>
<p>Terry M. Scarborough</p>	<p><i>12/12/2007 8:29:53 AM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>Duplicate comment; see preceding response.</p>
<p>Brooke Anderson Etowah Water & Sewer Authority</p>	<p><i>12/11/2007 1:03:48 PM SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>This plan needs to strengthen state and local control of private wastewater treatment facilities. The trust indenture needs to only come from a government entity, not from a private mortgage or title company. Private wastewater treatment facilities need to be coordinated with the local government's service delivery strategy and the regional planning districts' plans, not exempt from them.</p>	<p>This comment raises coordination issues to be addressed during regional water planning. It also raises an issue that would require statutory change and so, is beyond the scope of the water plan.</p>

<p>Mark Hooks</p>	<p><i>12/12/2007 8:26:49 AM SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>Section 13 Enhanced Pollution Management Practices Policy: On-Site Sewage Management Systems: This section contains very good language. The focus on maintenance is a critical piece of the plan. Septic systems have commonly been branded as polluters and a temporary fix until sewers can be extended. This negative image commonly arises from lack of maintenance by system owners. The septic system industry supports the proposed use of the various maintenance strategies described in the US Environmental Protection Agency's Voluntary National Guidelines for Management of Onsite and Clustered (Decentralized) Wastewater Treatment Systems (http://www.epa.gov/owm/septic/pubs/septic_guidelines.pdf) in implementing this section. Suggested action: Partner with industry professionals to provide guidance materials and training to regional water planning councils. Implementation Actions: Having adequate infrastructure available within a reasonable driving distance is a key component to discouraging the illegal and improper disposal of septage. One critical component that appears to be missing in this section is a proactive assessment of the infrastructure necessary to support proper septage treatment. Suggested action: The septic system industry recommends that the plan include implementation items indicating that the Division proactively work with regional water planning councils to plan for new treatment sites and to upgrade existing treatment sites where needed. State revolving loan funds monies should be used to assist in the development of new facilities where needed.</p>	<p>The plan will be implemented in conjunction with current statutes and rules concerning water management, including recent law regarding septage disposal. Action under that law will address some of the issues raised here. Some may also be considered during regional planning.</p>
<p>james scarbrough gwinnett water resources</p>	<p><i>12/12/2007 8:41:16 AM SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>Septic systems are permitted by the state health department. Maintenance requirements should be the responsibility of the permitting agency not local government that has nothing to do with the permitting initially of the system. Present state law prohibits health departments from requiring maintenance of non-mechanical systems.</p> <p>Present state law prohibits local government from regulating the nutrient content of fertilizer sold inside the local jurisdiction. For watersheds above lakes phosphorus is clearly the pollutant of concern and must be reduced. In an urbanizing area lawn fertilizer clearly needs regulation to reduce phosphorus.</p>	<p>This comment raises several issues that would require statutory change and so, are beyond the scope of the state water plan.</p>

Terry M. Scarborough	<p><i>12/12/2007 SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	Duplicate comment.
Steven White Home Owners Together	<p><i>12/7/2007 11:49:07 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The methodology for appointments appears to heavily favor politically connected selections. Currently many of these would be developers and not ensure a balance needed to make sure private homeowners and the public as a whole are properly protected. Developers in the Lake Oconee area are tying up water resources and making them private. Input is needed by informed lay-people.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Amanda Lang Georgia citizen	<p><i>12/10/2007 4:37:48 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Unfortunately for Augusta, the foundation of Georgia's long-term water plans is to give the Atlanta region the water it needs to continue growing as one of the nation's major cities. To achieve this end, they devised a way around those other pesky citizens of Georgia who might object to the theft of their local water. Georgia legislators are fashioning plan to transfer control our local water resources to the state of Georgia at large. New legislation strips water management from local city/county commissions and places it in the hands of 14-member appointed regional Water Councils that will designate how, where, and to whom all of Georgia's water resources will be allocated. Do we really want some powerful board of wealthy partisan political hacks deciding if it's more important for you to have drinking water or some metro Atlanta developer to have a lake for his/her new, upscale gated community? Leave Georgia's water resources in the hands of local elected officials where it belongs. No political appointees period. We do not need or want our water politicized.</p>	Duplicate comment.

<p>Brooke Anderson Etowah Water & Sewer Authority</p>	<p><i>12/11/2007 1:04:28 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>This plan lays out the basis for regional watershed planning of water resources. We support this effort. We were hoping that the regional water planning council boundaries would reflect EPD's stated commitment to watershed based planning. The State Service Delivery Regions defined by O.C.G.A. 50-4-7 do not reflect anything related to proper watershed planning. Dawson County and Etowah Water and Sewer Authority are members of the Upper Etowah Watershed Assessment project. The Authority withdraws water from the Etowah River, we discharge to the Etowah basin, and our proposed reservoir will be in the Etowah basin. It makes no sense to place us in the Tennessee/Savanna regional planning district. We ask that either through changing the State Service Delivery Region or the regional water planning council boundaries, Dawson County be placed in the Coosa basin. Overall, we propose the map be redrawn to more accurately reflect the watershed boundaries. We also propose the map be redrawn showing overlapping boundaries for counties which lay in two or more watersheds. This would be a better representation of true watershed based planning. With the varying sizes of the planning districts, EPD should not limit the sizes of the councils. The council memberships should not be exclusively appointed by the Governor, Lieutenant Governor, and the Speaker of the Georgia House of Representatives. The members should also be elected/appointed by the users, local governments, and/or authorities. We believe that in the end it will be the local governments and authorities who will pay for this plan. They should have a strong voice in these councils.</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Lou DuFresne Jackson Lake Homeowner</p>	<p><i>12/11/2007 9:52:26 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Please--you must base the water planning regions on each basin--not the old RDC's or something similar to them!! It's about the water--and my Upper Ocmulgee Basin has meaning to those below us--not three basin's away.</p>	<p>The water planning regions have been redelineated.</p>
<p>james scarbrough gwinnett water resources</p>	<p><i>12/12/2007 7:56:35 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>at least one half of the members of the planning councils must be local elected officials from counties or cities. These elected officials will have the responsibility for setting the water and sewer rates that will be required to pay for the implementation of the plan. They are accountable to the citizens that will pay the water and sewer bills that will fund the plan. Appointed council</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	members that are not elected officials are only accountable to the person who appointed them. Accountability to the rate paying public is of utmost importance. Water and sewer systems and improvements cost millions of dollars and good government dictates that the decision makers must be accountable to the users of the services.	
Rusty Moye Grady County	<i>12/12/2007 8:30:22 AM SECTION 14: REGIONAL WATER PLANNING</i> Local Governing Bodies should have members appointed to regional Councils if they are going to be responsible in any way for the Plan's implementation	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Doug Eaves Johnson County	<i>12/12/2007 10:51:05 AM SECTION 14: REGIONAL WATER PLANNING</i> In re: Section 14 subsection (5) Designation of Water Planning Councils- It should be required that local governments comprise a minimum of 50% of the voting membership of the Water planning Councils. In addition the appointments of all other members should be submitted to the Board of Directors of the RDC's for comments and review. Since the RDC Boards are comprised of local government officials this will provide local input into the Water Boards.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Terry M. Scarborough	<i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i> The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.	Duplicate comment.
Duncan Cottrell	<i>12/12/2007 11:00:25 AM SECTION 14: REGIONAL WATER PLANNING</i> regional planning is better done on a watershed basis rather than on political boundaries. Planning for utilization of a given river system and for maintenance of its water quality will not be effective if the system is chopped into disjointed segments with responsibility dispersed into diparate planning groups. The Water Plan should organize regional planning on a HUC 8 watershed basis.	The water planning regions have been redelineated.

<p>David Aldrich City of Hartwell</p>	<p><i>12/12/2007 11:12:00 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I believe it is paramount that at least half of those appointed to the regional planning boards be local government officials. Thus far the direct impact has been directed primarily to the public water systems, therefore, they should be well represented on the board</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Gene D. Gunnels Town of Mt. Airy</p>	<p><i>12/12/2007 11:16:42 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Local Governments should supply an elected official to the council since they represent the local citizens and then fill the remaining seats with persons that are appointed. This will allow those that are to enforce regulations the ability to develop and understand the regulations.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Casey W Moore City of Leesburg</p>	<p><i>12/12/2007 11:25:36 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Local Governments need representation as they are accountable to taxpayers. The local governing body will be charged with protecting public health and should have decisive authority over decisions affecting taxpayers.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Steve Kennedy City of Kennesaw</p>	<p><i>12/12/2007 11:26:02 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public's representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Eva Galambos City of Sandy Springs</p>	<p><i>12/12/2007 11:32:26 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>City officials should comprise a majority of the regional boards. Eva Galambos</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Harry Jue City of Savannah</p>	<p><i>12/12/2007 11:33:59 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The establishment of a process for appointing the regional water planning councils for developing the regional water planning and development plans. This language was first revealed on December 6, 2007 and comments are due during the week of Dec. 10. The language in the plan dictates that the governor will appoint 10 members to each council, the Lt. Governor will appoint 4 members and the Speaker of the House will appoint four members. We believe that since local government will undoubtedly be responsible for the vast majority of the costs of implementation of regional plans that it is imperative that a majority of seats on each regional council be guaranteed to local, elected, appointed officials or utility directors. At least 50% of the makeup of these regional councils should be as described above.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Terrell Jacobs City of Douglas</p>	<p><i>12/12/2007 11:43:59 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>As local governments are the primary stakeholders in use of water resources in the State of Georgia. Local governments should have at least half of the representations on the Water Planning Councils to determine the planning of water resources.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Ray Louder</p>	<p><i>12/12/2007 11:44:09 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>At least half of the members of the councils must be local elected officials. These officials have the responsibility to the citizens that pay the local water and sewer bills and they should have the authority to make decisions effecting the taxpayers.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Dan McCranie Dodge County Commissioners</p>	<p><i>12/12/2007 11:54:28 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Sirs, As a countywide elected official, I am concerned that the local elected official both city and county will bear the brunt of compliance of whatever rules are developed. This group of local elected officials are closer to the citizens and already represent those citizens. It would follow that a significant number of the elected representatives should be on the local water advisory councils. Sincerely, Dan McCranie Chairman Dodge County Board of Commissioners</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Henry Tyson City of Fitzgerald</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Section 14, Paragraph (3)(b) should be amended to read: iv. "Each regional Water Planning Council shall have nine (9) (50% of 18) of the established seats represented by local governments." Local governments are charged by their citizenry to deliver the services needed in the respective jurisdiction, and water is one of the primary services. Because the local government is immediately responsible to the local citizenry for the delivery of water utility services, cities and counties should be involved in the governance structure of the planning council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Brad Carver Hall Booth Smith & Slover</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>1) Page 78, Section 14, regional Water Planning, Implementation Actions, item (5) f. iv., insert "in Georgia" after "government." 2) Page 79, Section 14, regional Water Planning, Implementation Actions, item (7) c. i., insert "in Georgia" after "governments".</p>	<p>These suggestions are more in keeping with revisions to a rule. Since the plan is not in rule format, these changes were not made.</p>
<p>Mark Wyzalek Macon Water Authority</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The major area that can be improved upon in the draft plan of December 7 is how regional Water Planning Councils' members are chosen. These regional councils are a key part of the state water plan. Current draft plan has all members appointed. We think a better idea is that at least 50% of the members be due to the legal obligation they have to provide water and sewer services – these are authorities like Macon Water Authority, cities, and counties. The rest of the members should be appointed to ensure balanced representation of all water interests - including environmental and business. This is similar to how members of the Metro North Georgia District are chosen.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Braye Boardman</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I urge the State Water Council to ensure that elected local government officials represent at least half of the voting membership on each of these regional water councils. Also Section 14-1 (a)- now defines the planning districts as the state service delivery regions. We are in #7 which includes Burke, Columbia, Glascock, Hancock, Jefferson, Jenkins, McDuffie, Richmond, Taliaferro, Warren, Washington, and Wilkes Counties. If I'm not mistaken that means that the RDC's will be the lead planning agencies. The districts were supposed to follow basin or sub basin boundaries. Only three of these twelve Counties are within the Savannah River basin, so this delineation does not appear to make sense</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Jeff Lariscy City of Guyton</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>It is my understanding that municipalities and other local government entities that are charged with implementing this plan are not currently guaranteed representation in the planning process. Please reconsider this and make certain that all stakeholders have a voice in the plan.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>C. Lester Polk County</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>It is imperative that local governmental officials be a key component of the regional Water Planning Councils. Local governments will always be the ultimate ages for implementation, so their inclusion is a necessity.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Todd Edwards ACCG</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Comments jointly submitted by: Association County Commissioners of Georgia (ACCG), Georgia Municipal Association (GMA), and Georgia Association of Water Professionals (GAWP) ACCG, GMA and GAWP believe that at least half of the voting members on each regional planning council should be local government or water utility officials as:</p> <ul style="list-style-type: none"> • Local governments and water authorities are primarily responsible for implementing the water management practices recommended in regional water plans; • Failure of local governments to implement regional water plans will directly impact their ability to receive EPD permits and GEFA grants and loans, key components of providing public drinking water and sewer services; • regional water plans will, necessarily, have to be integrated with local water, sewer and water protection plans for effective and efficient long-term water, wastewater and stormwater management planning; • Local governments are responsible for ensuring compliance with other state and federal clean water requirements, including the implementation of Total Maximum Daily Loads (TMDLs). These responsibilities will be directly impacted by management practices recommended in regional water plans; • Local governments are responsible for land-use planning and zoning which directly impact development patterns which, in turn, significantly effect stormwater runoff and a stream's assimilative capacity – these practices are intricately entwined with successful long-term water quality management planning; • Local governments are responsible for enacting and implementing provisions of the Georgia Planning Act, aimed at protecting our state's precious natural resources and directly linked to water quality and quantity management measures in the plan; • Local governments are ultimately accountable through the ballot box to the communities (the public) which 	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>they represent. Accordingly, they must act on behalf of the public's interest in water planning or will have to, appropriately, answer to them at election time. • Local governments, in partnership with the state, are charged with protecting the public health and the safety and welfare of Georgia's citizens – the first of nine guiding principles outlined in the 2004 Comprehensive Statewide Water Management Act; • Local governments will best be able to represent their region's citizens in consultations with surrounding regional planning councils in the make up of their plans; • Local governments and water authorities will best know what sort of water management and conservation practices they are capable of employing, and at what costs these will bear on public rate- and taxpayers; • Local governments may likely be called on to provide additional funding for regional planning administration. They will also be key partners with the state and other water permit holders, should there be a future need, in developing a dedicated, long-term source of funding to ensure the success of the Water Plan; and • Local governments, in short, will ensure that the public is adequately represented in making key decisions regarding water use that impact Georgia citizens and communities. Toward this end, ACCG, GMA and GAWP respectfully ask the Water Council's consideration in revising Section 14: regional Water Planning, Implementation Actions (3)(c) to incorporate the following language: i. Of the Governor's 10 appointments, at least two members must be mayors, or their designees, with the largest populated municipality represented; at least two members must be chief elected officials of a county governing authority, or their designees, with the largest populated county represented; and at least one must represent a public water authority or utility within the region. ii. Of the Lieutenant Governor's four appointments, at least one must be a mayor, or his or her designee, and at least one must be a chief elected official of a county governing authority, or his or her designee, but neither of which shall be from the same county. iii. Of the Speaker's four appointments, at least one must be a mayor, or his or her designee, and at least one must be a chief elected official of a county governing authority, or his or her designee, but neither of which shall be from the same county.</p>	
<p>Joe Maltese Middle Chattahoochee Water Coalition</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>In the spirit of the Middle Chattahoochee Water Coalition mission we have been actively involved in the statewide water planning process since it began and have until the Water Council's December 5th meeting stood ready to support EPD's plan, and believed even with areas of disagreement it would result in a workable framework to support planning in Georgia. However, on December 11, 2007 our Board of Directors decided by a</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment</p>

	<p>unanimous vote that we must oppose this plan in its entirety based the Water Council's revisions which effectively killed any hope of meaningful water planning through its creation of arbitrary planning regions and poorly devised regional planning councils. We oppose EPD's water plan because it has called for the creation of unrealistic planning districts that bear no basis in reality or relationship to the resources that they are designed to address. The proper application of resource planning can only occur if regions are based on basins and watershed boundaries. While we understand that jurisdictional and political boundaries will necessarily be included in the regional structure, the current proposal is based solely on a political convenience and can't change the reality of where our water originates or flows. True water planning can only happen when watershed boundaries are used as planning boundaries and all water users in that basin or watershed work together to determine how to sustain the system while meeting the demands we place on it. We are very disappointed that after this lengthy and time consuming process we cannot support this plan, but would very much like that to change. Toward that end we offer a suggestion as to how the state might approach a more realistic definition of a water resources planning unit that is based on natural boundaries. This example (submitted seperately to EPD) reflects a planning unit based on the existence of the natural features that establish the basin. Political boundaries that cross basins can be dealt with utilizing language that was originally included in the first December 5th draft. We offer this map as a remedy to the problem and for use in considering how to approach other basins in Georgia. The MCWC Board also takes issue with the concept created by the Water Council for the appointment of representatives to these new planning units. We believe it is important to bring a wide array of diverse stakeholders to the table to guide the planning process. The selection of these participants should not be centralized by a few in Atlanta, but should be made by those closest to the local resource being planned. Therefore, we believe that the pool of planners should be defined as being broad based as reflected on page 78 of the most recent draft. Furthermore the candidates should come from the planning district, and be selected by the local delegation of state representatives and senators. The Middle Chattahoochee Water Coalition has worked tirelessly to support and implement comprehensive water planning in the Chattahoochee basin. We have worked with this plan since its inception and were eager to support it until the Water Council's most recent revisions. We have all had differences on one issue or another, but felt that at the very least we would have a foundation and a framework we could work from. The actions this past Friday brought that to an end. We ask that the Water Council reconsider our recommendations and move to a basin oriented planning approach so we can lend our support to this critical effort.</p>	<p>of members to the regional water planning councils.</p>
--	---	--

<p>Michael Chidester City of Byron</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public's representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. The plan should ensure that local government officials have a strong presence of representation on the councils, at least one third to one half of each council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Majorie Hicks Concerned Citizen</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The boundary lines for the Water Planning Regions should follow WATERSHED BOUNDARIES FIRST and political boundaries second. The decades-long Tri-State Water Wars should be lesson enough in this regard.</p>	<p>The water planning regions have been redelineated.</p>
<p>Dan Fischer Citizen</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>An article in the Macon Telegraph morning reported "...that regional water planning districts, which in the future will have vast control over local water decisions, were drawn based on economics rather than watersheds." It is critical that the planning districts be coterminous with watersheds and aquifers (this may require overlapping districts) in order to protect all users in the watershed or aquifer. Also, there should be a unified state-wide plan that assures that the "pieces" (regional plans) form a coherent whole.</p>	<p>The water planning regions have been redelineated.</p>
<p>Mike Berg, Chairman Dawson County Board of Commissioners</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The first issue for Dawson County is that it is removed from the majority of its basin. Dawson County is a member of the Upper Etowah Watershed Assessment project and withdraws water from the Etowah River, discharges it to the Etowah basin, and our proposed reservoir will be in the Etowah basin. While it is understood that there will be challenges in devising any map for water planning purposes, we believe the regional water planning boundaries should better reflect EPD's stated commitment to watershed-based planning. Dawson County should not be placed in the Tennessee/Chattahoochee/Savannah regional planning district. Secondly, Dawson County strongly recommends that the majority of members of regional planning councils be local elected officials as local governments will be charged with implementing the vast majority of water management measures outlined in the plan. This will ensure that the regional planning</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>councils represent all community stakeholder interests and will provide public accountability on the councils. This representation will also serve to guarantee that decisions on water management practices are balanced between the benefits and the costs to taxpayers.</p>	
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Similar to our previous recommendation, we believe that energy efficiency and conservation measures should be considered when developing a regional water development and conservation plan (WDCP). As the WDCP is directed to assure long-term, sustainable availability of water supply and assimilative capacity in the region, it will be equally as important for the WDCP to address the selection of new energy supply choices. We ultimately recommend that poorly conceived energy proposals that have excessive water quality impacts should be prohibited in the state water plan based on the fact that there are better, less-water intensive energy alternatives: namely, energy efficiency and renewables such as wind, solar, and some forms of bioenergy. Further, it says that water planning regions will be coincident with the state service delivery regions defined by O.C.G.A §50-4-7. At the recent Water Council public meeting in Midway on the third draft of the plan, it was mentioned that the Savannah River Basin could be broken up into four separate planning regions. We are concerned that this does not allow for the cohesive and protective management of the entire basin and other basins that are broken up in pieces so-to-speak.</p>	<p>The current draft includes links to the State Energy Strategy in the guiding policy statements and in the provisions for regional planning. That strategy addresses energy efficiency, among other elements, and was developed, in part, to inform future decisions regarding energy supply choices.</p> <p>The water planning regions have been redelineated.</p>
<p>Virginia Holton Packing Corporation of America</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>1) We were disappointed to learn that the regional planning district boundaries were changed at the 11th hour. These districts do not represent the river basins for which the stakeholders groups were formed and on which they have been working for 2 years. In fact, some planning districts (the Oconee) cut a river right down the middle. In others (the Chattahoochee) there are three planning districts along its length south of Atlanta, and the Altamaha district covers five river basins! This is unworkable from a water planning and water resource protection perspective! While it may be easier for EPD to administer along current service boundaries, it certainly makes no sense for the Water Plan. We believe it will cause the plan to fail. We oppose this change and recommend that the planning districts, other than the existing Metro Atlanta region, conform as closely as possible to the geologic and hydrologic river basins. 2) The appointed representatives to the regional</p>	<p>The water planning regions have been redelineated.</p> <p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>water councils should all be people with strong ties to that particular planning region, either residing there or having it as their principle place of work, to ensure that they are knowledgeable about and concerned for that district.</p>	
<p>Rhonda O'Connor Forsyth County</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Section 14 (3) Designation of Water Planning Councils: We believe that it is critical to this process to have appointees that represent the local community. Each region has varied needs and sources of water supply, therefore local government and local community leaders should be represented and given priority by every jurisdiction in the proposed regional council. Additionally, all appointees should have informed knowledge of the water supply either by profession or experience. The composition of the Council should be at least half or more represented by local government. Local government is the largest stakeholder in the process with the responsibility of delivery.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Gary Black</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>In 2006, Georgia farm gate value of agricultural products was \$10.4 billion. Total output impact of agricultural production and directly related processing was \$55.2 billion, making agriculture, by far, Georgia's largest economic engine. Such a vital industry is deserving of adequate representation on each of the regional water councils prescribed in the water plan. To properly capture the needs and involvement of this industry, we recommend at least four of the 18 voting members of each regional council have an agriculture water use background and be familiar with, or involved in, agriculture production. Such backgrounds in irrigation efficiency, landscape design and maintenance, soil and water conservation, food and fiber processing, and crop and livestock production is vital to having quality and informed discussions on managing Georgia's water resources.</p> <p>We ask that the Georgia Department of Agriculture, the Georgia Soil & Water Conservation Commission, and the Georgia Forestry Commission be included in the submission and review of names of nominees to be submitted to the Governor, Lt. Governor and Speaker for these appointments.</p>	<p>Language regarding nomination and appointment of members of regional water planning councils has been revised. This comment also provides information that may be useful in implementation actions once the plan is adopted.</p>

<p>Bud Queen High Falls Towaliga Watershed Alliance</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>1. The proposed Water Planning Regions are un-realistic and is a road map to failure of the Plan. The only way to have regional water districts for planning purposes is to develop them by Watersheds or combinations of watersheds and the appointees by from those watershed regions. 2. A firm dedicated funding source must be provided by the Legislature for this Plan to succeed. A wild guess of 30 million over 3 years is just that a wild guess. 3. After attending the 11 December public forum in Macon, Ga and the questions and answers provided, it seems the closing deadline should be extended and every county commission Chairperson should be given this briefing before the Plan moves on to the Lagislative Branch for action. I know of county governments that do not know there is a statewide water management plan process.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p> <p>The water planning regions have been redelineated.</p> <p>A dedicated funding source, and change in the deadline for submission of the plan, would require changes in statute and so are beyond the scope of the state water plan.</p>
<p>John Miller City of Palmetto</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Elected local government official representation on these councils is critically important to ensure the goals of furthering pubic health, safety and welfare. As local government officials are directly accountable to the citizen, their membership will ensure a representative voice on these regional water planning councils. At least half of the positions on the councils should be held for local elected officials.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Jack C. Dozier Georgia Association of Water Professionals</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The Georgia Association of Water Professionals (GAWP) co-authored comments submitted earlier today by Todd Edwards on behalf of the Association County Commissioners of Georgia (ACCG), the Georgia Municipal Association (GMA), and GAWP. On behalf of GAWP, I want to reiterate our appreciation for the dedication and hard work of the Water Council members and their designees, as well as the countless stakeholders involved in the development of this draft Comprehensive Statewide Water Management Plan. We fully support the development of this plan, believing it essential in order to guide the state in managing our water resources both now and into the future. We do, however, share the major concern expressed by Mr. Edwards on behalf of ACCG, GMA, and</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>GAWP with the proposed make up of the regional water planning councils in the current draft plan and fully support the language submitted by Mr. Edwards for the Water Council's consideration in addressing this concern. I will not reiterate that language here, but wanted to be sure that it was clear that GAWP fully supports the comments jointly submitted on behalf of the three organizations whose members will undoubtedly bear the lion's share of the ultimate costs of implementation of the regional water conservation and development plans. It is vitally important that local government and water utilities be assured proper representation on the regional councils, as outlined in detail in the joint comments submitted by Mr. Edwards in Section 14.</p>	
<p>Don R Emmons City of Midway</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I believe that the appointment process to the regional Councils be revisited. There should be no less than 50% or more local officials on the regional Councils as they are the main players and involved with all aspects of the requirements and compliance..... Also a need to ensure that local and regional politics DO NOT have the opportunity to influence the regional councils...this is vital and should have serious ramifications if found.....</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Stuart A. Moring City of Roswell</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The Plan should stipulate that at least half of the members of the water planning councils be from local governments or related water authorities. The professionals and elected officials of these organizations have the most comprehensive understanding of the uses and demands for water, and the operations and economics required to meet those requirements. It is essential that people who understand the benefits and costs of given policies are well represented if the policies developed are to be workable. Elected officials are charged to meet the needs of the general public, not the appointing authority.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Don Rhodes City of Louisville</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Local governments will be primarily responsible for carrying out the regional water plans developed by the Councils. Therefore, we feel local governments should be the public's representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and what costs the practices will bear on local taxpayers. Please consider amending the plan to ensure that local government officials represent at least half of the voting membership on each of these regional water councils</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

<p>Charles T. Hall, Jr. GA Fruit & Vegetable Growers Assn.</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>December 12, 2007 Dr. Carol Couch Director Environmental Protection Division Georgia Department of Natural Resources 2 Martin Luther King Boulevard 1152 East Tower Atlanta, Georgia 30334 RE: Draft Comprehensive Statewide Water Management Plan Revised and Published by the EPD on December 7, 2007 Dear Dr. Couch, These comments are submitted on behalf of the over 350 fruit and vegetable grower members of the Georgia Fruit and Vegetable Growers Association (GFVGA). The majority of our fruit and vegetable growers are located in South Georgia, which is also one of the highest agricultural irrigation areas of the state. Georgia's fruit and vegetable industry, as estimated by the 2006 farm gate value, accounts for over \$1.1 billion of Georgia's economy. The GFVGA board of directors and membership would like to thank Dr. Couch and the Water Council for the long hours and countless meetings conducted across the state of Georgia. It has been made clear by the continued diligence of the Water Council that it is your wish to ensure all parties are represented and all opinions are heard. The Georgia Fruit and Vegetable Growers Association support the development and implementation of a comprehensive statewide water management plan that maintains the vision of the policy statement signed by Governor Sonny Perdue. We commend Dr. Couch and the Water Council's understanding of the necessity fruit and vegetable growers and operations have for timely access to water, the need for creative solutions to Georgia's water crisis, and the need for regional water planning councils. However, we do not support the currently proposed water planning regions or the member selection process. The "service delivery areas" being used to designate regional water planning districts do not adequately reflect proper watershed planning and does not represent the consumptive use of water from defined hydrological or geological systems. In Section 4, Water Quantity Policy, of the Plan it states "water quantity policy is to manage the consumptive use of water on the basis of defined hydrological systems of water and groundwater so that sufficient amounts remain within a water source to allow all users and uses – present and future – reasonable opportunities to benefit from the values provided by the resources." As it is understood, all capacity and yield measurements and data are to be done by on the basis of hydrological systems. The service delivery areas are then charged with "developing regional water plans to ensure that consumptive use stays within the sustainable yield for that water source, or within a consumptive budget that is based on practices that supplement the sustainable yield in a way that recognizes the shared nature of water resources." We do not believe the proposed service delivery areas will be</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils. Revisions include the addition of the Department of Agriculture to the agencies responsible for the nomination process.</p> <p>The water planning regions have been redelineated.</p>
--	---	--

	<p>effective in managing or implementing regional water resources. We would support regional water planning districts redrawn on hydrological system boundaries to reflect watershed boundaries. Selection for each regional water planning district is currently proposed to be made by the Governor, Lieutenant Governor and the Speaker of the House of Representatives. The Georgia Fruit and Vegetable Growers Association submits that council membership should not be exclusively appointed by these elected officials but should also include members elected or appointed by local governments and/or authorities. Local representation should make up the majority of each council. We believe water resources will be best managed in the hands of local stewards with sufficient oversight and approval from state officials, the Water Council and EPD. Being that agriculture is the largest industry in the state of Georgia, it would be understandable to have representation in all water planning efforts. To ensure adequate representation of the agricultural industry on each regional water planning council, we recommend the Georgia Commissioner of Agriculture have the opportunity to appoint one member who will be eligible to attend all meetings and vote. We commend the State for making the development of this Plan a matter of priority. State funding sources must be committed and utilized to establish budget funding to fully meet the data collection needs for water planning as well as staff needs associated with the development, implementation and ongoing management of the Plan. On behalf of the officers and directors of the Georgia Fruit and Vegetable Growers Association we look forward to continued collaboration with water planning efforts and express our appreciation to the Council and Director for the opportunity to provide these comments. Sincerely, Charles T. Hall, Jr. Executive Director</p>	
<p>Darron Collins World Wildlife Fund</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>World Wildlife Fund (WWF) works in 19 of the most biologically important regions of the world -- places like the Amazon, Congo, Galapagos Islands, and, interestingly, the Southeastern Rivers and Streams of the United States. I say this only to underscore to Georgians that our water resources are not only of local and regional importance, but of global importance. Though, as an organization, WWF has worked in the southeast for almost a decade, we are a new organization in Georgia and lack the depth of knowledge that many of the other reviewers have where the specifics of this plan are concerned. That said, we come with "fresh eyes" and decades of global experience with natural resources planning. And, although we applaud the many individuals and groups that have obviously dedicated significant time and effort to this water plan, one significant problem stands out. From our experiences, water planning and management</p>	<p>The water planning regions have been redelineated to more closely follow hydrologic boundaries.</p>

	<p>councils that are not rooted in ecologically-based units like watersheds will always be problematic and will fail to deliver the desired outcomes. We hope that this issue can be addressed and hope WWF as an organization can add value in the future to this important process.</p>	
<p>Glenn Page Cobb County- Marietta Water Authority</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Implementation Action 3.c. At least half of each WPC should be composed of local elected officials or their designees to ensure each WPC properly reflects and represents citizens of the region.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Ellie Morris The City of Pearson</p>	<p><i>12/12/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>In order for local elected officials to be primarily responsible for carrying out the regional water plans developed by the state water councils I feel they should have input and be able to agree with the directives. In order to do this local elected officials should make up at least 50% of the council. Since local governments are charged with protecting the public, safety and welfare of Georgia's citizens they should understand and be in agreement with the practices required by the State.</p> <p>In order for local elected officials to be primarily responsible for carrying out the regional water plans developed by the state water councils I feel they should have input and be able to agree with the directives. In order to do this local elected officials should make up at least 50% of the council. Since local governments are charged with protecting the public, safety and welfare of Georgia's citizens they should understand and be in agreement with the practices required by the State.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Duncan Cottrell</p>	<p><i>12/6/2007 4:06:24 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Amend state law to allow collection of user fees for water withdrawal and treated wastewater discharge and earmark by statute these monies for water plan implementation. As part of drinking water and NPDES wastewater permits, require permit holders to perform water quality and quantity assessments at more sites in their area to provide information needed for planning and implementation. Be sure the Metro North Georgia Water Planning District plan is unambiguously required to take into account their impacts to downstream communities.</p>	<p>Amendment of state law is beyond the scope of the state water plan.</p> <p>The North Georgia Water Planning District will be subject to the state plan and future revisions of the District's plans will follow EPD guidance that is consistent with that</p>

		provided for preparation of regional water development and conservation plans.
Steve Howard Camden County	<i>12/11/2007 8:54:47 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Camden County Board of Commissioners urges adequate local government representation to be provided on the regional water planning council. The Board of Commissioners strongly encourage that the draft water plan be revised so that half of the voting members on each regional council are local government officials. We support the ACCG's position on this subject.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
BILL SAWYER MACON COUNTY, COMMISSIONERS	<i>12/12/2007 7:30:41 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Local governments, are charged with the protecting the public health, safety and welfare of our citizens, the public should be represented by those they elect, half of the seats on the regional water planning councils should be from these elected officials..	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Brenda Stalvey Echols Board of Commissioners	<i>12/12/2007 9:48:14 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> There must be accountability for decisions made by the regional water planning councils. Since elected officials, who answer to local citizens, will be charged with carrying out the plans developed by the RWPC, they must have input in the process. Who knows better what will or will not work at the local level than local elected officials? It is essential that 1/2 the RWPC be from local county governments.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Jennifer Scott Town of Braselton	<i>12/12/2007 10:46:44 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments' ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public's representation on these councils as they are accountable to the public, know	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.

	<p>what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils.</p>	
<p>Bob Beck City of Winder</p>	<p><i>12/12/2007 10:51:02 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Proposed language in the draft state water management plan does not guarantee seats for elected local government officials on the regional water councils that are central to the planning and implementation effort outlined in the plan. Local elected officials will be primarily responsible for carrying out the regional water plans developed by these councils. Failure to implement these regional plans will directly impact local governments’ ability to get EPD water permits and GEFA loans. Moreover, local governments will be the public’s representation on these councils as they are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. Local governments, in short, are charged with protecting the public health, safety and welfare of Georgia citizens – the major guiding principle of the Water Plan. Accordingly, they must be guaranteed at least half of the seats on regional water planning councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>James Phillips</p>	<p><i>12/12/2007 10:55:41 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>These comments were delivered at the December 11, 2007 meeting in Columbus, GA to EPD representative, Tim Cash and a broad audience. Thank you for including them in the record of public comment. From James H. Phillips Pine Mountain Georgia jhphillips65@bellsouth.net Until this meeting, I had thought the news media was doing a thorough job of tracking the state water plan issue. Unfortunately, I have seen nothing from the media regarding the changes made by the Water Council last Friday to the recommended composition of each Water Planning Region. These changes alarm me and I am strongly opposed to utilizing jurisdictional boundaries or service districts verses the hydrological boundaries for planning purposes. My appeal is to everyone engaged and responsible for developing the long-term water</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p> <p>The water planning regions have been redelineated.</p> <p>The comment raises several other issues which are beyond the statutory</p>

	<p>management plan for our state. The message being delivered by the drought is fundamentally simple ? Water is a precious resource ...threatened water shortages are cause for better planning ? ...outages of water are a disaster ? So we find ourselves today in the condition of threatened water shortages — We must avoid water outages ? ...We need rain ? ...We do not control rain ? ...Mother Nature, who is a close relative of our Maker, is in control ? What we can control is better planning...sounds simple, but is anything but simple. Self-serving political agendas and excessive ‘lawyering’ quickly torpedoed better planning. We must base our better planning on a fundamental concept, that being the law of supply and demand ...As supply is limited, demand must be limited. ...As supply expands, demand can expand. Our region and state has historically been blessed with an abundant water supply, yet today we find ourselves no longer able to make that assumption. We have grown tremendously...our water supplies are approaching dangerous limits. The problem is that an overwhelming amount of growth has occurred in what we now call “Greater Metropolitan Atlanta”. Media reports are daily headlines, i.e., how, where, and when are we going to receive relief??? Yet much of our state and region, while much drier than normal, is not in the woefully uncomfortable condition of greater metro Atlanta. No one wants to halt reasonable economic growth. That is what our quality of life is based upon. Better planning therefore, must recognize that investment dollars are transferable. Water is where you find it and much more difficult to transfer than dollars. Simply put, place your investment dollars where you find the resources, the water. Many areas within our state and region find themselves with adequate water supplies to support future growth. Smart investment should follow the resource. We have exhausted the luxury of having metro Atlanta growing so, so rapidly with little regard to water supply realities. Most assuredly, the number one complaint of our fellow Georgians who live and work in metro Atlanta is the awful traffic congestion the experience daily. Can you imagine fighting traffic all day and then returning home to find your family short on water or in dire need of water? Those who are charged with developing our state water plan must recognize several essentials: 1. Develop plans to encourage investment where water is available – discourage investment where water is in short supply. 2. Cooperate with sister states in the region. If we expect Tennessee to assist Georgia, then Alabama and Florida should expect cooperation and assistance from Georgia. 3. Listen closely and heed advice from scientists, environmentalists – these are the voices who urge basin planning as opposed to inter-basin transfers. 4. Forget the idea that</p>	<p>authority of the Water Council and its member agencies, and therefore, beyond the scope of the statewide water plan (e.g., inter-regional growth management).</p> <p>General language regarding coordination with neighboring states has been added to the draft plan.</p> <p>Language regarding state funding has been added to the section titled <i>Implementation of Regional Planning</i>. The governor's fiscal 2009 budget request relating to the Water Plan, currently under development by the governor's staff with support from several state agencies, is expected to identify the sources of funds for the execution of work tasks associated with the State Water Plan. Details of the governor's budget request for the State Water Plan will be made available when it has been completed.</p>
--	--	--

	<p>building more reservoirs around the metro Atlanta area is the answer – these will simply be inefficient investments that will result in exacerbating the current dilemma. 5. Commit the dollars to a sound plan and timely implementation...avoid a politically popular funding mechanism that has insufficient political will to sustain it! Thank you. The people who populate the Chattahoochee River Valley are looking to your leadership in the upcoming legislative session.</p>	
<p>Michael Lamar Morgan County</p>	<p><i>12/12/2007 10:55:57 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Morgan County strongly believes, due to the fact the responsibility for successful water plan implementation (of the water plan developed by the Water Council) rests in the hands of local governments, at least half (preferably a majority) of the voting membership of each regional water planning council should be made up of locally elected officials. Michael Lamar Morgan County Manager</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Terry M. Scarborough</p>	<p><i>12/12/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>The Association of Georgia Surveyors requests that the EPD Director not be given the personal discretion to limit, exclude, or deny the rightful participation of any design professional land surveyor, in the performance of his professional practice under General Law.</p>	<p>Duplicate comment.</p>
<p>Jimmy Wilbanks City of Dacula</p>	<p><i>12/12/2007 11:46:53 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Since locally elected officials are charged with the public welfare, public safety and are directly responsible to their electorates, it is necessary that local government officials be guaranteed at least half of the voting seats on each regional water planning council. These locally elected officials will know what management practices the local government is capable of implementing and what the cost of these practices will be for local taxpayers.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Jessica Roth, AICP City of Duluth Planning & Development Dept.</p>	<p><i>12/12/2007 11:59:28 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>It is crucial that there be adequate local representation on the regional water planning councils. As local jurisdictions will have a big responsibility in carrying out the plans developed by the councils, local governments must have a voice at the table. The local government elected officials are the appropriate</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>

	<p>voice of the people. Additionally, local governments must identify how to fund and provide resources for the plan implementation. Therefore, it is imperative that the local governments have input. Failure to include the local governments will compromise the plan's implementation and could have some unintended negative consequences. We support the position of GMA in recommending that at least half of the seats on regional water planning councils are guaranteed to local government officials. Thank you for the opportunity to provide feedback.</p>	
<p>Brad Carver Hall Booth Smith & Slover</p>	<p><i>12/12/2007 12:52:39 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Page 81, Assessment of Resource Capacity, first paragraph, first sentence, insert "unacceptable" after "causing," consistent with other language in the plan.</p>	<p>This change will be made as the <i>Implementation of Regional Planning</i> section is revised to be consistent with the final Comprehensive State-wide Water Management Plan.</p>
<p>Dennis Bergin City of Lula</p>	<p><i>12/12/2007 12:52:50 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Please Consider the following; Anticipated Budget Funding to the state appears to still be up in the air, and who is going to pay for it? At what point or form will the average public citizen be expected to pay out of pocket and how much. On the issue of funding at the local district funding appears to be even more vague. It would appear that depending on what district your community may be in the state may be relevant to how much funding and or how affective your district will be. What mechanisms will be available to fund state requirements, and local requirements? Will only the direct users pay at the local level for the development of the criteria and mandated requirements? Or will per capita contributions be applied? It would appear that this would be the fairest and most equitable way to fund such endeavors as the benefit in resolving these maters is beneficial to all citizens of Georgia</p>	<p>Language regarding state funding has been added to the section titled <i>Implementation of Regional Planning</i>. It should be noted that, under current statutes, it is not possible for EPD to charge fees for water withdrawal, drinking water, or treated wastewater permits to support water plan implementation.</p> <p>The governor's fiscal 2009 budget request relating to the Water Plan, currently under development by the governor's staff with</p>

		support from several state agencies, is expected to identify the sources of funds for the execution of work tasks associated with the State Water Plan. Details of the governor's budget request for the State Water Plan will be made available when it has been completed.
James Conley City of Blairsville	<p><i>12/12/2007 1:18:34 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>State Water Council The City of Blairsville would like to urge the State Water Council to make local government officials represent at least half of the voting membership. Local officials are charged with protecting their citizens' public health, safety and welfare and need to be involved in the development of their regional water management plans. Local government needs to be involved in any management practices that will have cost effects on their citizens. Thank you, Jim Conley</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Jimmy Kitchens Coffee County Board of Commissioners	<p><i>12/12/2007 1:34:02 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Coffee County Board of Commissioners believe that local officials need to be represented on the regional water planning council. Since local officials are committed to tending to the needs of the citizens of their jurisdiction, they should occupy seats on the planning council. Citizens have put their trust in their local officials to represent them and we believe that local officials should be given the opportunity to represent their citizens on the regional water planning council.</p>	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Doug Eaves Johnson County	<p><i>12/12/2007 1:52:53 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Johnson County is pleased with the proposed regional Water Council map. We believe that it accounts for our Water resources, economic engines, and ties in</p>	While the water planning regions have been redrawn, the region that includes Johnson County is largely unchanged.

	well to our planning assets and resources. We strongly recommend that the DCA also adopt this configuration and number for the new service delivery regions	
Gerald W. Woods Southeastern Natural Sciences Academy, Inc.	<i>12/12/2007 2:51:38 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Local elected officials will be primarily responsible for carrying out the regional water plans developed by regional councils so they should be participants. They are accountable to the public, know what water management practices the local government is capable of employing, and at what costs these practices will bear on local taxpayers. I believe local government officials should be assured of occupying at least half of the seats on regional water planning councils.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Richard Crowdis Dougherty County	<i>12/12/2007 3:00:17 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> The regional Water Planning Councils should have at least half of their voting membership mandated to LOCAL ELECTED OFFICIALS due to their accountability to the public and the knowledge of knowing the capabilities of local government implementation and the costs to taxpayers.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Tye Howard Forsyth Georgia	<i>12/12/2007 4:03:10 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> I strongly believe local government officials should be assured of occupying at least half of the seats on regional water planning councils. Insufficient regional stakeholder participation will ultimately result in a great plan on paper, without decades of data and local issues being adequately represented during the council's deliberations on the state-wide scale. Thank you. Tye Howard - Forsyth Mayor-Elect	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Harold Logsdon City of Peachtree City	<i>12/12/2007 4:15:45 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Almost any group of individuals could accomplish the task of developing a regional water plan. However, since local jurisdictions will bear the majority of the responsibility for implementing the plan, locally elected officials should comprise a majority of the voting membership of regional water councils. We	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.

	<p>have an opportunity to put local representatives together for regional planning. The only way to ensure that the plan is embraced and implemented at the local level is to provide a seat at the table for those affected by the plan during its creation.</p>	
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>12/12/2007 4:26:42 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>regional water conservation plans need to have oversight by EPD to ensure that a regional plan does not weigh too heavy on any particular industry sector or classification of use (outdoor water use for example) to achieve conservation goals. Current drought conditions that have required a 10% water use reduction had the unintended consequence of causing local water authorities to go after outdoor water use. Such short sighted actions has resulted in a major economic impact to the urban agriculture industry, including sod and horticulture producers, landscape professionals, retail garden centers, some golf course facilities and others. Oversight by EPD and the outlined public comment periods are needed to help prevent such poor decision-making at the regional level.</p>	<p>Language in the current draft includes provisions for EPD oversight of regional planning as well as public review and comment during plan preparation and prior to adoption of the final water development and conservation plans.</p>
<p>Tim Thoms</p>	<p><i>12/12/2007 4:46:56 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>p. 83 paragraph 2 Specify the method and criteria for nominations to each water planning council and on what basis the Director will designate those council members. p.85 paragraph 4: The comprehensive monitoring plan needs to be given much higher priority since decisions should not be made without adequate data</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Steve Sykes City of Thomasville</p>	<p><i>12/12/2007 4:47:28 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Local elected officials should represent at least 50% of the Development Council.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Bob Lewis Marietta Power & Water</p>	<p><i>12/12/2007 5:51:03 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>There should be a balance of representation on the regional councils including water professionals, business owners, elected officials and citizens.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning</p>

		councils.
G. Melvin Davis Chairman	<i>12/12/2007 6:03:43 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> As a local elected official, I strongly urge that majority representation on the WPC's include local elected officials. These elected officials are held accountable for planning for the future of their jurisdiction. They should have the voice with regional water planning.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Glenn Page Cobb County-Marietta Water Authority	<i>12/12/2007 10:58:36 PM IMPLEMENTATION OF REGIONAL WATER PLANNING</i> Water Planning Councils, p. 83, first full paragraph: state that funding shall also apply to the original planning council, the MNGWPD. Water Development and Conservation Plans, Preparation of: third paragraph. Needs to mention that maximizing use of existing service delivery assets and planned investments is of great importance (local bond covenants can be affected by changes in local plans). p. 84, regarding disputes between WPCs, will adjacent or downstream WPCs be allowed to challenge plans of the Metro District, as it exists under different statutory authority? p. 85, regarding scientific advisory board and use of the GWRI, will the scientific advisory board be given oversight of the work by GWRI? There needs to be review and oversight of GWRI's work.	This comment raises several issues to be considered as the <i>Implementation of Regional Planning</i> section is revised to be consistent with the final Comprehensive State-wide Water Management Plan and during implementation actions following adoption of the plan.
John Kachmar City of Johns Creek	<i>12/12/2007 3:40:10 PM ACKNOWLEDGEMENTS</i> On behalf of the City of Johns Creek, I urge the State Water Council to ensure that elected local government officials represent no less than half of the voting membership on the regional water councils.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.
Edwin McBride City Of Alston, GA	<i>12/12/2007 4:29:35 PM ACKNOWLEDGEMENTS</i> I feel like at least half of of the seats on regional planning councils should be filled by local elected officials.	Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.

<p>Michael Hatcher Town of Dexter</p>	<p><i>12/12/2007 ACKNOWLEDGEMENTS</i></p> <p>I strongly recommend that local government officials and their water operators represent at least half of the voting membership on each of the regional water councils.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>
<p>Gary E. Morris Town of Mount Airy</p>	<p><i>12/12/2007 ACKNOWLEDGEMENTS</i></p> <p>I feel that it is very important that elected city officials make up at least 50% of the regional water councils. We will have a major responsibility in the administration of these plans, and need to be involved with the process.</p>	<p>Revised language was added to Section 14 to address the appointment of members to the regional water planning councils.</p>