

September 13th Revised Draft Comprehensive Statewide Water Plan
Responses to Comments Submitted through the Water Council's Web Site
 December 9, 2007

Commenter	Comment Section/Comment	Commenter
Steven Marion	<p><i>10/7/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>HELLO? I Find it very hard to believe that in this 92 page “REVISED DRAFT COMPREHENSIVE STATEWIDE WATER MANAGEMENT PLAN” That you have absolutely “NO” mention of “protection” of the very WATER you are trying to plan for. Have any of you ever heard of Safe Drinking water? Adaptation of Backflow Prevention programs? Cross connection protection of the Drinking water system? You can find all the water in the world. But to make it safe and protect it from intentional or unintentional contamination is most important and cannot be left out... Have any of you even thought of asking a Plumber how to keep it safe??? Start with the “University of Florida TREEO center” and then maybe contact the “American Backflow Prevention Association” this could help you “KEEP THE WATER WE HAVE SAFE”</p>	<ul style="list-style-type: none"> • In response to this and related comments, the December 5th draft has been revised to reference the state’s program for protection of water supply watersheds and aquifer recharge areas. • The statewide plan builds on the statutory framework that directs Georgia’s current state water management programs. As such, the provisions of the plan are intended to supplement many ongoing programs that are not explicitly addressed, including backflow prevention.
Sam Booher	<p><i>10/8/2007 4:42:43 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Since Atlanta currently gets it water from our National Forests, what is being done to protect that water source for future growth? New York City has a unique water supply system which has been the envy of the world. Why is Georgia/Atlanta not doing the same? The New York water supply system has been the purest and most bountiful supply of drinking water in the United States. It utilizes three separate systems of reservoirs which obtain water from some 2,000 square miles of watershed in upstate New York. The three systems include the Croton System, the Catskill System and the Delaware System. The Croton system was an essential part of the life support system required by the growing</p>	<ul style="list-style-type: none"> • In response to this and related comments, the December 5th draft has been revised to reference the state’s program for protection of water supply watersheds and aquifer recharge areas. • The comment raises several other issues which are beyond the statutory authority of the Water

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	<p>metropolis. Without it the city would have never grown from 300,000 in 1830 to a city of 3.5 million at the turn of the century. The introduction of the Croton water caused the ground water level to rise many feet, because the waste water was disposed of locally. Consequently the Croton Department laid 70 miles of sewers between 1850-1855. New York City once again developed a wasteful lifestyle. The Croton system was capable of delivering 30 million gallons a day, enough to meet the city's growing needs for many years. However, in a little more than a decade, consumption was threatening to exceed demand. In 1910, New York City's population climbed to over 4.8 million. The larger population put a strain on the Croton system and the city was forced to reach out to the Catskill mountains to meet demands. The city purchased vast areas of land in the Catskill and purchased the watershed rights to many more. More than 100 sewage plants discharge treated wastewater in streams that flow into city reservoirs (the plants are now being upgraded). Over 110,000 individual septic and other subsurface systems in the watershed system also could pollute the water supply. Of concern too, say environmental groups and drinking water officials, is stormwater runoff from roads, driveways and other paved surfaces, and from lawns, farms and golf courses. Rainwater picks up contaminants as it washes over these surfaces, and can flush pollutants into watershed streams and reservoirs. The 300 year history of NYC's water resources culminating in the construction of the Catskill Aqueduct and the Ashokan Reservoir are as important now as in 1917. BACKGROUND New York City's water supply constitutes what may well be the region's single most important capital asset. The network, which has 19 reservoirs, is composed of three inter-related systems. The oldest, dating back to 1842, is the Croton system, located primarily in Westchester and Putnam counties. Beginning in the early 1900s, construction started on the Catskill and later the Delaware systems. Together, these two systems have six reservoirs, all west of the Hudson River, and send water downstate from as far as 125 miles away. These 19 reservoirs and the watersheds that feed them supply roughly half of the state's population with more than 1.2 billion gallons of water every day. City water officials accurately describe this remarkable supply, often overlooked by most New Yorkers, as an engineering marvel. With New York facing</p>	<p>Council and its member agencies, and therefore, beyond the scope of the statewide water plan (e.g., inter-regional growth management).</p>
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<p>significant fiscal challenges, it may seem like an unusual time for citizens to launch a new campaign to preserve New York City's upstate reservoirs and their watersheds. Yet that is exactly what is happening. Twenty-one groups, including some of the region's leading environmental and civic organizations, have unveiled a forward-looking plan that envisions expanded programs to safeguard watershed farms and forests and protect the lands that drain into New York's upstate reservoirs from sprawl that generates pollution. In a recent letter to Governor George Pataki and Mayor Michael Bloomberg, representatives from the 21 groups noted that, despite progress over the last several years, "far too many acres of watershed lands are not permanently protected, and significant portions of the watershed are confronting intensified threats from haphazard development." The letter outlined ambitious measures that the authors say are necessary to secure New York City's drinking water supply for future generations. The environmental and civic groups believe that implementation of an enhanced watershed protection plan will not only protect the public health of roughly 9 million water consumers, but will help avoid multi-billion dollar city expenditures for water filtration facilities.</p> <p>NEW THREATS FROM SPRAWL DEVELOPMENT In 1997, Governor Pataki, New York City and officials from upstate watershed communities signed an agreement that broke a political logjam and advanced a cooperative upstate-downstate partnership for watershed protection. Among other things, that program has allowed the city to purchase 40,000 acres of undeveloped watershed lands from willing sellers. Despite this, though, sprawl development has continued unabated and is racing ahead of state and city efforts to protect watershed wetlands, forests and meadows that are essential to a healthy watershed ecosystem. The trend is most obvious in the east-of-Hudson Croton system reservoirs and the Kensico basin, the 21-group letter warns. "New subdivisions, corporate and business 'parks' and even strip shopping developments have been transforming the East-of-Hudson watershed for years," the environmental and civic groups write. They note that Putnam County is the fastest growing part of the state, with a 69 percent population increase between 1970 and 2000. Twenty-one groups, including some of the region's leading environmental and civic organizations, have unveiled a forward-looking plan that</p>	
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	<p>envisions expanded programs to safeguard watershed farms and forests and protect the lands that drain into New York's upstate reservoirs from sprawl that generates pollution. In a recent letter to Governor George Pataki and Mayor Michael Bloomberg, representatives from the 21 groups noted that, despite progress over the last several years, "far too many acres of watershed lands are not permanently protected, and significant portions of the watershed are confronting intensified threats from haphazard development." The letter outlined ambitious measures that the authors say are necessary to secure New York City's drinking water supply for future generations. The environmental and civic groups believe that implementation of an enhanced watershed protection plan will not only protect the public health of roughly 9 million water consumers, but will help avoid multi-billion dollar city expenditures for water filtration facilities. More than 100 sewage plants discharge treated wastewater in streams that flow into city reservoirs (the plants are now being upgraded). Over 110,000 individual septic and other subsurface systems in the watershed system also could pollute the water supply. Of concern too, say environmental groups and drinking water officials, is stormwater runoff from roads, driveways and other paved surfaces, and from lawns, farms and golf courses. Rainwater picks up contaminants as it washes over these surfaces, and can flush pollutants into watershed streams and reservoirs. Ideally, in an era of proposed public works projects and Federal job stimulus plans, New York City will see the wisdom of bolstering its moribund construction industry and build a water purification plant and not proceed with the plan to further undermine the rights of the landowner in the Catskill Mountains. .New York City will have the pure water it needs to continue to grow.</p>	
Christina Lee	<p><i>10/9/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Our local Atlanta media is not getting the message across to people of how critical this water shortage really is. Simply having yet another watering ban is not enough to make people understand how critical this water shortage is, and how much worse it's probably going to get. An acquaintance of mine who is very involved with water-related issues and is a Chattahoochee River Keeper says that</p>	<p>The comprehensive statewide water plan is intended to guide long-term planning for Georgia's water resources and is not intended to guide responses to extreme</p>

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	<p>if something isn't done immediately, the City of Atlanta will dry up its water source within the next 4 months! He told me that the city now uses 4 times as much water as the Chattahoochee produces, and that at this point, rain will not solve the problem. I've also heard that wells in North Georgia are drying up. THIS NEEDS TO BE FRONT-PAGE NEWS, but it isn't!!! Why??? I had hoped to be able to post my comments about the water crisis on the public forum of AJC.com, but was instead relegated to this site. Not only are they burying this story and playing down its important, they're not even allowing public comment on it on their website! I realize you don't want people to panic, but on the other hand, you don't want to wait until the last minute to get this message out to folks either. I'm sure the city doesn't want any headlines about how critical this water shortage is because they don't want to run developers off. But, if we have that serious of a shortage, we need to put a moratorium on development. Some of the exceptions to the current ban should not be allowed, such as golf courses being allowed to be watered, and allowing the watering of landscaping during the first 30 days after planting. I'm sorry, but golfing is an indulgent luxury for the rich and is not critical to survival. I don't have a lot sympathy for residential landscapers since they fight nature in order to force non-indigenous grasses and plant life to grow instead of allowing indigenous foliage (which doesn't require being watered) to grow naturally. Insofar as professional landscapers are concerned, they deserve a 30 day warning, but in the current environment, they should not be planting any seeds that need watering until this crisis is over (and we can only hope it ends). The only exception that's viable in my opinion is allowing those who grow food to be allowed to water their gardens. By allowing golf courses to continue to be watered, the wrong message is being sent, and people aren't taking the crisis as seriously as they should. Before having to implement things such as indoor water-use restrictions, why not have people be getting used to restricting their water use voluntarily? The city of Atlanta can be very slack about fixing broken water pipes under the streets. I've seen water running down my street for over a year from some broken water pipe under the sidewalk. The city needs to take the initiative and diligently scan the city for leaking pipes that are on public property and therefore unlikely to be reported as</p>	<p>conditions, like drought or the emergency circumstances that may result. The comprehensive statewide water plan will be implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide responses to drought or other emergency circumstances.</p>
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	<p>leaking. Additionally, the water company needs to monitor excessive water usage and to investigate water usage that appears to be caused by leaks and faulty plumbing. For those who are unable to afford to deal with plumbing problems, the city needs to establish volunteer plumbers to assist with fixing leaking pipes. If our water source dries up, we will have a public health crisis within a week or 2 weeks at the most. Most people have never been unable to obtain water for even a few hours, and they take water totally for granted. I've had my water shut off for over 2 weeks in the past due to burst pipes. You quickly learn the value of water in that situation. One last thought. Why do we have to share our Chattahoochee water resources with Alabama when Alabama has more natural water resources than any state in the union? Alabama is sitting on a goldmine as far as water resources are concerned, and we may need to help them develop the means to tap those resources and sell water rights to Georgia. If volunteers are needed to help in any way, please contact me.</p>	
<p>Tom Hunter</p>	<p><i>10/15/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>If our water resources are so limited, why do we continue to allow more houses to be built?</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>Matthew A. Bryan</p>	<p><i>10/17/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p><i>1.</i> Every citizen in the state of Georgia does not have a right to all the water that may be found anywhere within the boundaries of the state. The view that water, wherever it may be found, "belongs to Georgia" is faulty, and a dangerous assumption to start out with. It belongs to the private property owners or the municipalities/regions surrounding it first and foremost. Atlanta, for instance, has no right to the water enjoyed by the people of Savannah and the Coastal regions. Therefore, I oppose any policy which fails to recognize this crucial priority of right, and seeks to establish a centralized management agency/authority over all water use throughout the entire state, capable of usurping local decision-making about how to best steward local water sources. <i>2.</i> "Georgia" does not have a water</p>	<ul style="list-style-type: none"> • Language was added to the December 5th draft to underscore the foundation of the regulated riparian doctrine, referenced in the first part of this comment. • The comment raises other issues which are beyond the statutory authority of the Water Council and its member agencies, and therefore, beyond the scope of the statewide water plan. • The plan will not compel transfer

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	<p>crisis...Atlanta does. The rest of us read of the woes and wonder why the lawmakers and policy wonks can't see the simple problem: You don't have enough water, because you have too many people in too small a space. The law or policy should not punish wise and restrained growth everywhere else in order to reward reckless profiteering land uses in Atlanta. To do so is to do harm to your neighbor's enjoyment of his own land, and so contrary to law. Therefore, I oppose any policy which fails to address the underlying problem, which is NOT the sources of water throughout the state, but is really the unsustainable growth rate in Atlanta. If you don't have the water IN YOUR AREA, then you can't keep adding people. This should be obvious. 3. I oppose any involuntary transfer of water between river basins.</p>	<p>of water between river basins.</p>
<p>linda conover waterfront home owner & multi business owner</p>	<p><i>10/17/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i> Where is the scientific data coming from? Where is the budget?</p>	<p>This question will be answered during implementation, once the draft plan is adopted. Development of a comprehensive plan for resource assessment, including ongoing monitoring, will be a critical early step in implementation.</p>
<p>Richard Jagodzinski H&J Underground Testing</p>	<p><i>10/18/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i> I am an independent contractor providing water leak detection services in the state of Illinois. I would like to offer my services to the state of Georgia in an effort to assist in the management of undetected water loss due to leaking distribution systems. If there would be interest please email hjunderground@yahoo.com. ThankYou</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>marion dobbs</p>	<p><i>10/18/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i> I think that, in public and other discussions of the water plan, supporters should put less emphasis on the saving of endangered species per se, a very hot button subject for opponents. If, instead, it is pointed out that the "Endangered Species</p>	<p>This comment relates more to current management of the Apalachicola-Chattahoochee-Flint and the Alabama-Coosa-</p>

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	Act" is fundamentally the Endangered Habitats Act, that might resonate more with folks on the other side of the aisle. Further, it should be emphasized that the loss of a species has unknown and potentially ominous consequences for all water users.	Tallapoosa river basins and does not suggest a revision that is within the scope of the statewide plan.
Nancy Carter	<p><i>10/18/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I think education on and encouragement of the use of grey water is needed. Also we should not be using drinking quality water for toilets if possible. And development should only take place where there is adequate water to support it. New development should be put on hold until this can be determined.</p>	<ul style="list-style-type: none"> • The December 5th draft has been revised to include provisions regarding consideration of grey water use as an element in water conservation in the municipal and industrial sectors. • While regional water plans will provide information on water availability and can inform local decisions about development, placing a moratorium on development is beyond the statutory authority and scope of the statewide plan.
JC Corcoran Simply Enough	<p><i>10/19/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	Water use and pollution from agricultural activities are managed under a variety of ongoing programs and this comment does not clearly suggest a revision that is within the scope of the statewide plan; no action was taken as a result.
Rae Sikora	<p><i>10/19/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass</p>	<ul style="list-style-type: none"> • The December 5th draft has been revised to include provisions regarding consideration of grey

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	<p>inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>water use as an element in water conservation in the municipal and industrial sectors.</p> <ul style="list-style-type: none"> • Water use and pollution from agricultural activities are managed under a variety of ongoing programs and this comment does not clearly suggest a revision that is within the scope of the statewide plan; no action was taken as a result
<p>David D. Harvey City of Rome</p>	<p><i>10/23/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Thank you for providing the 10/18/2007 forum for Rome/Floyd County citizens and many of our neighbors to discuss this draft of the plan. My comments today are based on consideration of the presentation and participant comments that evening as well as my service for 12 years as a Rome City Commissioner many years ago. The single most important feature for our new Georgia plan should be recognition that sharing water resources across and among basins must be accompanied by full return of properly treated wastewater to its point of origin basin at the expense of the intermediate user of that water. Thank you for considering and including my point of view in Georgia's final Comprehensive Statewide Water Management Plan. David D. Harvey 10/23/2007 The single most important feature for Georgia's new plan should be recognition that sharing water resources</p>	<p>The Water Council considered revisions to the 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>
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 3:15:03 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Georgia Agribusiness Council supports the development and implementation of a comprehensive statewide water plan that maintains the vision that "Georgia manages water resources in a sustainable manner to support the state's economy, to protect public health and natural systems, and to enhance the quality of life for</p>	<p>This statement of principle is generally consistent with the approach taken in the current draft, and in the December 5th draft, <i>Implementation of Regional Water Planning</i> has been revised to</p>

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	<p>all citizens." Our understanding since the passing of HB 237 is that plan should serve as guidance to achieve the goals of water use efficiency, water quality protection, water conservation, improved water resource inventory through augmentation, and a process for planning at a regional level. Methods to achieve these goals should be debated utilizing the regulatory and legislative processes. We believe the plan is best served by instituting a phased approach to make sure the necessary data collection is accomplished as the first priority.</p>	<p>provide information on phasing of implementation with a timetable.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:28:35 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Southern Alliance for Clean Energy continues to appreciate the work that has occurred in order to develop Georgia's first statewide water management plan. We appreciate that the 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, we remain very concerned about funding of these proposals. Without proper funding, they are meaningless. 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 September 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 We hope the Water Council will ensure that the state water plan they eventually submit 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 does not describe how Georgia's existing energy infrastructure, especially electricity production, negatively impacts water supply</p>	<ul style="list-style-type: none"> • 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. • Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). • The comment raises several issues that will be addressed in preparation of regional water development and conservation plans. For example, 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

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	<p>sources in terms of degrading water quality and reducing water availability nor does it discuss future energy planning. In the past month, 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. Though the revised draft plan places water conservation as a top-tiered, overarching policy goal, it 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 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</p>	<p>water users. The comment provides information that will be useful in development of guidance for regional planning, once the statewide plan is adopted.</p> <ul style="list-style-type: none"> • Language has been added to the December 5th plan to clarify that, like the statewide water plan, regional water development and conservation plans will be periodically reviewed and revised. Review and revision will include the resource assessments provided as guidance for regional planning. This review and revision cycle will provide an opportunity to respond to new information and changing conditions, including those predicted to result from climate change.
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	<p>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>Bryan Hager</p>	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>General Comments: The watershed based planning process is useful but the focus needs to be on effective implementation. This plan is inadequate in two areas of implementation: local government response and state agency response. Local governments are responsible for land use and water use in Georgia. This plan provides inadequate incentives, penalties and resources to help local governments implement the plans and procedures proposed in the plan. First, the water planning process needs to be better coordinated with the state mandated comprehensive planning process. Second, there need to be quantifiable measures developed to assess local government implementation of programs in the final plan. Third, the state needs to provide incentives and penalties to help get local governments to achieve the measures. Fourth, the state needs to provide technical and financial resources to help smaller local governments participate in the planning and implementation process of the watershed based planning. All state agencies that use water or have an impact on water resources need to be involved in plan development and implementation. This includes obvious things like siting of schools, industrial parks and roads in watershed or ground water recharge areas, or areas with limited water resources. The State School Board, Department of Industry, Trade and Tourism and Department of Transportation, and other state agencies need to take responsibility for helping to develop and implement the water plan.</p>	<ul style="list-style-type: none"> • Coordination with the comprehensive planning process is addressed to the extent possible under current statutes in <i>Section 13: Enhanced Pollution Management Practices</i>. The Department of Community Affairs also intends to revise its planning guidance to address coordination with the statewide water plan following its adoption. • The comment also raises several issues related to regional planning and provides information that may be useful in development of guidance for regional planning, once the statewide plan is adopted.
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The Georgia Water Coalition (GWC) is pleased to provide the following comments to you and the rest of the Water Council concerning Georgia's first comprehensive statewide water management plan draft. The revised draft, released on September 13, 2007, is an important first step towards comprehensive</p>	<ul style="list-style-type: none"> • The December 5th draft has been revised to clarify the plan is intended to guide long-term planning for Georgia's water

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	<p>management of Georgia's water resources for the benefit of current and future generations and for the sustained health of our rivers, streams, and aquifers. The GWC includes 151 different conservation, civic, religious, and business organizations committed to sound water management; a list of member groups is attached. GWC members have been intimately involved in the water planning process since the Joint Study Committee was convened in 2001; members have also served on the Basin Advisory Committees, Technical Advisory Committees, and Statewide Advisory Committee convened as part of the current water planning process. The draft plan, titled Georgia's Water Resources: A Blueprint for the Future, is a significant culmination of years of work to improve the way our state manages water, and we appreciate the time and effort that members of the Georgia Environmental Protection Division (EPD) have expended to create this draft plan. We also applaud EPD for casting the plan as a reaffirmation of Georgia's existing regulated riparian system, which regulates water as a public resource for the benefit of all Georgians. As an initial matter, we think it is important to put the Georgia water plan in the proper context. The Coalition is very concerned with the rhetoric that has been circulating among Georgia's leadership over the past few weeks about the drought situation and the water supply for metropolitan Atlanta. This situation calls for more far-reaching and sustainable solutions than suspending important federal laws and pledging to build reservoirs as the way out of the natural constraints that north Georgia faces because of its small watersheds. Economic development is an important and viable engine for Atlanta and the rest of the state, but it must be well planned so that we do not encounter periodic or perpetual water shortages in the future. This statewide water plan must contain policies designed to guide leaders to make responsible decisions about where and how development occurs, both in north Georgia and elsewhere. Regional planning must be fully funded everywhere in Georgia, and we hope that the Water Council, the Governor's office, and the legislature will commit to provide this funding as forcefully as they have voiced support for building new reservoirs. While the GWC appreciates the changes that have been made to the draft plan in response to our August 15, 2007 comments, we have continuing concerns about portions of the plan that are laid out in detail</p>	<p>resources and is not intended to address responses to extreme conditions, like drought, or emergency circumstances that may result. It will be implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide responses to drought or other emergency circumstances.</p> <ul style="list-style-type: none"> • The resource assessments and regional water plans called for in the plan will provide information on water availability to inform local decisions about growth and development. • Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>).
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Virginia Holten Packaging Corporation of America	<p><i>10/30/2007 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The following comments are submitted on behalf of Packaging Corporation of America (PCA), Valdosta Mill, Valdosta, Georgia. The Valdosta Mill has operated since 1953, and PCA is a major employer in Lowndes County, with the highest per-capita payroll and nearly the largest total payroll; paying the highest property tax in Lowndes County and being a major source of revenue to the local economy through our purchases and a major source of revenue for the State of Georgia through our national and international sales. In addition, our operation results in the maintenance of over 500,000 acres of forest land in timber, providing large tracts for groundwater recharge area and rainwater run-off filtration, as well as extensive wildlife habitat and carbon sequestration. PCA has participated through trade associations in comments on the June 2007 draft, and made very brief comments at the October 19 Public Hearing in Valdosta Georgia, at which commenters were limited to 3 minutes. The Water Plan is critical to the future of our State, and is very important to PCA as a long-time Georgia operation and to its many employees, suppliers, and customers whose economic livelihood is based on its continued operation. Reliable, sustainable water supply is vital to us, our industry in general and our facility in particular. Our comments are two-fold. First we have general comments on the overall Water Plan, its concepts, direction, and where we think it hits or misses the mark. Second we will have specific comments on the Water Plan language itself as contained in the September 2007 draft. Both the overall concept and the specific details are of the Water Plan critical elements to having an acceptable, workable Plan, and we hope our comments provide information and insight that is useful to the Water Council and the Environmental Protection Division (EPD) as they work to finalize the Plan. CONCEPTUAL LEVEL COMMENTS ON THE SEPTEMBER 2007 DRAFT WATER PLAN 1. The Water Plan should be adopted as a Policy Document and not as a Rule. The advice of the Attorney General to Dr Couch confirmed that this is acceptable under the Statute. The changes made from the prior draft are definitely in the right direction. The introductory discussion (pp 5-</p>	<ol style="list-style-type: none"> 1. The September 13 draft was changed from a rule format to a plan format, following the direction of the Attorney General. The current draft also clearly recognizes the rulemaking authority that current statutes give to the Board of Natural Resources. 2. This statement is generally consistent with the approach taken in the current draft. 3. Language regarding state funding has been added to the December 5th draft (at the end of 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. 4. The September 13 draft was changed from a rule format to a plan format and the revisions shown in the December 5th draft include provisions regarding consideration of rulemaking by the DNR Board rulemaking, which

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	<p>48 in the September draft) lays out the framework for each of the regions in the state. It is useful in understanding the Water Plan and its components, and explaining why certain measures are necessary and/or appropriate in a given region, and may vary significantly from one region to another. It should be included with the Water Plan document as it is, recognizing that this section is strictly informational data rather than policy or management procedure, and the specifics of data it contains may change over time. 2. The Water Plan must be based on sound science, with a comprehensive evaluation of the resources and demands, present and future, that includes all the vying interests identified in the Mission Statement. The current draft of the Water Plan clearly emphasizes the need and goal for a sound scientific foundation for the Plan and this emphasis should be maintained in the Final Plan. The water resource assessment is a vital tool that needs to be started right away, and it should draw on the resources of our universities and other governmental agencies such as the United States Geological Survey (USGS), and make use of data already being collected throughout the State by EPD staff and Permittees under EPD's permit requirements, as well as generating new more complete data. Data collection must, of course, be held to high quality assurance standards. Bad data is worse than no data when it comes to its use in decision-making. 3. The current Water Plan does not address funding. Implementation and administration of the Plan will be expensive, but it will benefit all the citizens of the state, including the many indirect water users such as individuals who consume food and products that use water in their production, whose economic welfare depends secondarily on the businesses and industries who provide these products, or who use water resources for recreation. As a result, the expense of the Water Plan should be borne by all the citizens of the State and not just a few. The Plan adopted by the Legislature must include a continuing stable funding mechanism allocated by the General Assembly on a permanent basis, and not pass these costs on to Permittees in the form of fees or other permit requirements. The mechanisms to fund the infrastructure improvements that will be required of cities and water regions to effectively achieve the goals of the Plan must be considered as well. Without both of these, the Water Plan will fail. 4. The Water Plan should leave rulemaking</p>	<p>respond to this and related comments. 5. In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to clarify how the water conservation implementation plan relates to the other provisions of this section. Revisions are also intended to clarify the ways in which flexibility is provided to water permit holders and applicants. 6. This statement is generally consistent with the approach taken in the current draft. 7. The current draft includes new restrictions on interbasin transfers. The Water Council considered revisions to the 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. 8. The element of the comment, along with #7, raise issues to be addressed in regional planning.</p>
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	<p>authority to EPD. It should not include, and, in fact, should specifically preclude, a duplicative rulemaking process to EPD's and should avoid a cumbersome, redundant Water Planning bureaucracy that is expensive and lengthens the permitting process. Nor should the Plan dictate specific rulemaking to the DNR/EPD. Under no circumstances should there be any taxing authority assigned to the Water Council or EPD for funding, implementation or administration of the Plan. The September Draft language is a big improvement over the June Draft with regard to clarifying EPD's authority and responsibility for rulemaking, but the Plan still dictates rulemaking by EPD in some sections. 5. The Water Plan as drafted is much too prescriptive in the later Sections, particularly Section 8 (2) for industrial sources, with requirements that show a fundamental lack of understanding of the complexity of and differences between the wide variety of industries and commercial operations in Georgia. This level of detail should be left to EPD through rulemaking and permitting. 6. The Water Plan must be flexible and address the resources and needs of each region of the State, with its site-specific needs considered. The issues affecting regions supplied by groundwater are much different than for the areas supplied with surface water and vice versa. The use of land application systems and the concept of consumptive water use are two notable differences between surface water and groundwater supplied regions. The September draft improved considerably on this issue over the June draft. This regional aspect of the Water Plan should be enhanced and not diminished in the final Plan. 7. The interests and needs of all Georgia's citizens, regional economics, and eco-systems must be given equal protection, and the resources of a particular region should not be diverted to another region just because of greater political or economic interests in that region. Protecting riparian rights and reasonable use for existing users and future users, especially downstream users, are key issues that need to be firmly established in the Plan. Specifically, all feasible measures to manage, conserve, reuse, reclaim and otherwise reduce water use in a particular region should be identified and implemented before interbasin transfers should be considered. Such things as advanced wastewater treatment of all municipal centralized wastewater treatment systems with return of treated water to reservoirs and/or dual plumbing systems</p>	<p>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.</p> <p>9. Language has been added or revised in several to underscore the foundation of the regulated riparian legal doctrine and provisions regarding reasonable use of water.</p> <p>10. This statement is generally consistent with the approach taken in the current draft.</p> <p>11. The provision regarding Significant Natural Resource Waters has been revised to call for an assessment of need for the new water use classification. The questions raised here can be addressed in that process and subsequent rulemaking by the DNR Board, if that occurs.</p> <p>12. The operational practices of federal reservoirs will be considered in the resource assessments and regional planning for those areas which have federal reservoirs. If these operational</p>
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	<p>for sanitation devices and outside water use, adoption of strict of water conservation standards/goals that take into account the site specific capabilities and resources of the region's water users, with demonstrated reduction of per capita water use or unit-of-production water use should be minimum requirements before considering interbasin transfers. Development of additional reservoir capacity within the region should also be evaluated and implemented where feasible, but without reducing historic and seasonal flows to downstream areas. It may even be necessary at times to impose temporary moratoriums on increased water withdrawals and require aggressive water conservation measures, such as has already been done in the Coastal counties, until water use is managed at or below the resources available and sustainable for that region. Without serious commitment to reduced water use in the Plan, the issues of water use exceeding capacities will only worsen as Georgia's population grows. In particular, the groundwater resources of southern Georgia should not be considered available for areas north of the fall line, due to the local demands already growing on this resource and the inordinate length of time it takes to restore deep groundwater reserves like the Floridan aquifer, compared to areas served by surface waters. As discussed in the introductory section of the Water Plan, Floridan aquifer groundwater levels have dropped steadily and significantly across the state over the last 20 years. The end result of exploiting this resource for North Georgia would be to move controllable temporary crises from North Georgia to a permanent crisis in South Georgia. The Coastal regions are already facing this issue, as are the drought prone areas of Southwestern Georgia. 8. The Water Plan should include the concept of incentives for activities that enhance or conserve water resources. These should include elements to encourage expedited conservation, such as "early reduction credits" for those who are proactive in their conservation programs, and should avoid the concept of blanket percent reduction goals, which discourage early action. Section 6 discusses the fast pace of development in Georgia that overwhelms the streams assimilative capacity, but has no solutions. The Plan should provide incentives to encourage landowners to keep their land in forestry or other green spaces, especially large landowners, as this provides large areas for groundwater recharge and filters and slows storm</p>	<p>practices change over time, revised resource assessments will be necessary.</p>
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	<p>water, improving water quality in streams. These could include incentives such as reduced property tax rates on forest land as long as it is kept in timber production rather than developed, or ideas such as shorter term or revocable conservation easements on larger tracts, that can expire in 15 or 20 years, but would maintain the green space and its water benefits for at least the interim period while other management strategies are implemented. Developers, builders, or homeowners who put in enhanced water conservation provisions such as ultra low water use fixtures, xerographic landscaping and reclaim water systems designed for minimum per capita water use, with good storm water retention systems that slow and clean storm water before returning it to streams or allowing infiltration to groundwater could qualify for reduced building permit fees. The Plan currently only addresses the storm water side of development. Conversely, those developers who don't meet minimum standards for per capita water use might be denied building permits. This incentive philosophy is in line with the concept of "conservation-oriented rate structure" as defined in Section 2, to increase cost per unit with increased usage to encourage conservation. With the proper incentives, the market place will work with the Water Plan and not against it. We are not suggesting that this level of detail be included as requirements in the Plan, but the concept of incentives should be included in the discussion in Section 4, Section 5, Section 7 and Section 8 and listed as another management tool in these Sections. The detail may better suited to legislation or rulemaking but it should have enough detail to explain the intent of this policy and its implementation as an element of the Water Plan. 9. The Water Plan should clearly state the respect for and protection of riparian rights for reasonable use of landowners and existing users, upstream and downstream. That does not preclude EPD adopting reasonable requirements for measuring, monitoring and managing water resources in each water use sector, but these should not be overly prescriptive and should be the minimum required to achieve a meaningful metric and cost effective goal. The final Water Plan should enhance and not diminish these concepts. 10. The Water Plan must protect the eco-systems as well as provide for human needs. Without adequate minimum water flows, which should vary with season, these resources can be permanently damaged or destroyed. For example,</p>	
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	<p>the estuaries along the coastal counties depend on a minimum freshwater flow to maintain the salinity balance for fisheries and spawning areas for marine life, which is essential to the economic well being of this region as well the ecological balance. In a like manner, the minimum flows down the Flint and Chattahoochee rivers are needed to maintain freshwater fisheries and aquatic life essential to these areas, as well as provide for the human and economic needs of the downstream citizens. Without balancing all the needs, which means reducing average human per capita water usage as Georgia's population grows, none of the water needs will be met on a sustainable basis. 11. The Plan should not dictate additional or duplicative rulemaking that is already the prerogative and responsibility of EPD. For example, the directive to mandate a new water quality classifications in Section 12 is unnecessary and unwise. The current anti-degradation provisions in the Georgia Water Quality rules are already in place to accomplish exactly what the proposed new classification is intended to do. At best, it would be redundant and unnecessary, at worst, it could, by default, be construed to weaken protection for other waters. 12. The Water Plan does not address interaction with the Corps of Engineers to better manage the reservoirs under the Corps' jurisdiction. Since these reservoirs include the main water supplies for the metro- Atlanta and western Georgia areas, without comprehensive and cooperative management, the biggest water resource issues in the State will be left inadequately managed. The current water shortage situation in the Atlanta-area clearly illustrates the critical need for long range planning and management. However, the drought has affected resources throughout the entire State, and the current severe situation in Atlanta should not drive the Water Plan toward solving the immediate issues at the expense of the long term interests of the entire State. SPECIFIC COMMENTS ON THE SEPTEMBER 2007 DRAFT PLAN: Section 1: Purpose The section is well written and includes the basics of many of the conceptual comments above. As always, "the devil is in the details" but this section is an excellent starting point. In particular, recognition of the concept of consumptive use, and how the traditional concept is very different for areas served by surface water supplies (0% consumptive use is a possibility and relatively low % consumptive use is not uncommon) versus areas served by</p>	
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	<p>groundwater supplies (where water use is 100% consumptive use no matter how efficient) under the conventional definition of consumptive use. Section 2: Definitions PCA recommends the following improvement in the definitions section. The “Water Reuse” definition should be changed to also include an explicit reference to internal water reuse within a facility. Many industrial applications have implemented extensive internal reuse practices that substantially reduce net water use, but without meeting the definition of “reclaimed water”. This is typically a more cost effective and efficient water reuse technique and such water reuse should be recognized under this definition as well as the use of reclaimed water, by changing the definition to read: 40) “Water Reuse” is the internal reuse water within a facility or the use of reclaimed water as a substitute for another...” (Underlined text indicates the changed wording). This change also fits better with the later discussion in Section 7, (1) a.of the Water Plan on “water reuse” as a management practice and Section 8, (2) c.i., where water reuse as redefined above is clearly the intent. Section 4: Water Quantity Policy The background section should be expanded to include the concept of economic and permitting incentives for activities that enhance or conserve water resources, and not limit the discussion to water conservation alone. These should include incentives for activities that enhance water resource protection and replenishment, including such things as maintenance of land in forestry, conservation easements, early reduction credits for business and industry who implement water conservation ahead of time, permitting incentives for enhanced water conservation design in construction and development, and conservation-based rate structures, etc, as discussed in the Conceptual Comments, Item No.7, above. Discussion language to this effect is needed in the Plan, and would fit well following the end of the second paragraph in Section 4 Background and in the Section 4 Policy statements: “4. Efforts to enhance water resource protection and replenishment, improving quality and quantity of the water resources, shall be encouraged , including appropriate incentives for activities such as maintaining large tracts of land in forestry or other green space, to allow greater groundwater recharge and retain, filter and slow rain water flow to surface waters.” Implementation actions consistent with this policy should be</p>	
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	<p>added as well. This concept as well as similar language could also be included in the Integrated Water Policy Discussion in Section 3 and Section 5 on Water Quality. Another improvement in the Implementation Plan in Section 4 would be to add language such as the following, as a new bullet point: “4. Existing conservation efforts as well as early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing the water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.” This language is needed also in Section 8, in addition to Section 4.</p> <p>Section 5: Water Quality Management The background section in this Section should also be expanded to include the concept of economic and permitting incentives for activities that enhance or preserve water quality as discussed above in both the Conceptual comments and Section 4 comments. These should include incentives for activities that enhance water resource protection and replenishment, including such things as maintenance of land in forestry, conservation easements. Discussion language to this effect is needed in the Plan, and would fit well following the end of the third paragraph in Section 5 Policy Statement: “2. Efforts to enhance water resource protection and replenishment, improving quality and quantity of the water resources, shall be encouraged , including appropriate incentives for activities such as maintaining land in forestry or other green space, to allow greater groundwater recharge and retain, filter and slow rain water flow to surface waters.”</p> <p>Section 7: Water Quantity Management Water reuse as listed in Section 7, (2) a. should refer to an expanded definition of water reuse to include internal reuse practices within a facility, where the end result is the same reduction in water use, but the reuse does not require treatment to the standards defined for reclaimed water. This can be most easily accomplished with a change as follows in the definition in Section 2, “(40) “Water Reuse” is the internal reuse water within a facility or the use of reclaimed water as a substitute for another...” If that is done, no changes are needed to this discussion in Section 7. This definition change is also in keeping with the water use reduction implementation measures listed in Section 8 (2) c.i. The management practices listed in Section 7 (2) b. should be more explicit regarding</p>	
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	<p>centralized wastewater treatment systems including, at least as a goal, advanced wastewater treatment of all municipal wastewater, to meet reclaim water standards, or potable water standards, so that it can be returned to reservoirs and/or can be used for dual plumbing systems for reclaim water reuse purposes, as a means to reduce the draw down on the reservoirs and demand on other water supplies. Putting the treated water back into the reservoirs is no different than discharging to rivers upstream of other cities who use the river as their drinking water supply, and the requirement for advanced wastewater treatment would assure more, higher quality water resources for both during low water flow periods. Such treatment would also serve to mitigate the environmental impact of discharged water volumes at higher percentages of the receiving stream volume during low flow conditions. AWT is a proven technology in use in many areas throughout the nation that have on-going water supply issues such as Georgia faces.</p> <p>Section 8: Water Demand Management Practices Policy</p> <p>The policy statement in Section 8 (1) must make clear that existing conservation efforts and early reduction efforts for water reduction will be recognized in the long range planning and establishment of water conservation goals, so those who have been proactive will not be penalized, such as would occur with “percent reductions” criterion over and above what has already been done, when compared with those who have not been as proactive. The following sentence should be added to the current item (1) or added as a new item (3) “Existing conservation efforts and early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing the water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.”</p> <p>The policy statement in (2) is good if the definition of the term “water reuse” is amended as proposed above for Section 2, although “water reuse” should be in bold print along with “reclaimed water”, the “or” changed to “including” to make this clear. The language would read: “(2) Water reuse, including the use of reclaimed water...”</p> <p>Internal reuse is a very viable water resource management tool in many instances, especially in industrial facilities, and various methods for such internal reuse are listed as a management tools in the implementation actions under</p>	
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<p>Section 8. But this practice is seldom free and often not easy. Including internal water reuse for credit as water reuse will encourage industry investment in more internal recycling and reuse, and will help achieve the policy objective of lowering demand, more quickly and more cost effectively than reliance on use of reclaimed water only. Not allowing such credit will have the counter effect.</p> <p>Implementation This section is problematic in several areas, as discussed below. It is much too detailed and includes requirements that are not reasonable, useful or even workable in some cases. First, the bulk of the requirements are placed on industrial users and nothing more than “encouragement” of conservation for farm-related users, regardless of the volume of water withdrawn for such use. On the other hand, the industrial users are saddled with excessive monitoring, audits, studies, reporting, reduction goals and demonstrations of improvement, with no consideration for those facilities who are already being proactive in water use reduction, no consideration of the wide variety of industrial users or their industry specific needs or capabilities, or site specific situations. It also is ambiguous about the protection of the rights for reasonable use by existing users and permit holders. Implementation item (1) should reiterate the additional policy language as follows: “g. Existing water use conservation efforts and early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.” The implementation action in Section 8(2) a., should be made clear that, if this particular set of provisions applies to existing permit holders for renewal of existing permits with no increase or expansion, as well as new permits or expanded permits, that the permit holders will get credit for reductions they have already implemented ahead of the renewal and that they will not be saddled with unreasonable or unachievable reduction goals. Language similar to that suggested earlier should also be incorporated here, such as: “iv. Existing conservation efforts and prior reductions in water use shall be recognized and credited in establishing water conservation goals and gauging water use efficiency.” Many water permittees have been aggressive in reducing their water use voluntarily, and they should not be penalized for being</p>	
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	<p>proactive with arbitrary goals such as % reduction requirements in permit renewals. In both (2) b. and (2)c. the cost of such requirements should be a consideration, with flexibility to give more emphasis to those with the highest benefit for the cost expended. This can be accomplished by amending the opening paragraph in each section to read: "...water conservation practices to the extent that the Director reasonably determines such measures to be cost effective and reasonably applicable to the applicant." In both (2) b. and (2)c. reference is made to "metering all water use that are not currently metered". This language is unclear and, if taken literally, overly broad and unreasonable. Although we believe it means to meter all the water coming into a facility (public or industrial), it could be construed to mean water meters are required on virtually every spigot and faucet. This language needs to clearly state that the intent is the former, i.e., to meter the input to any facility/location of any currently unmetered water use, but not every point of use, as could be implied with the current wording. It will suffice to meter the main line(s) into a facility or location to measure the total water input, sufficient to determine the overall water use per unit of production, total water use for a recreational facility or public building, or water use per residence, but not every point of use within that facility. The expense to meter each process water line in an industrial facility would be cost prohibitive, would be very difficult to maintain the operation and accuracy of the meters and to monitor the data, and, it would not produce data any more useful than with the major line metering. The language in (2)b.iv. is at least qualified to some extent by DNR rules already in place, but there is no such clarification or limitation on the language in (2) c.ii., and it shows a real lack of understanding of the complexity and capabilities of industrial facilities. The wording for industrial permittees should be changed to: (2) c.ii. "Measure all water input to the facility not currently measured;" Leaving the language as "all water use" is confusing and, if taken literally, is both unworkable and unnecessary. Similar changes need also to be made to the language in Section (2) b. for water providers. The wording in Section 8(2) c.i must be changed to replace the abbreviation "i.e." with "e.g." in (2)c.i.(1) – (4). The former abbreviation means "that is" and is followed by a specific, inclusive list of the options, with no additions. The</p>	
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abbreviation “e.g.,” means “for example” and when followed by a list gives representative examples but is not all-inclusive as “i.e.,” makes it. Since there are many ways to accomplish the specified objectives over and above those listed, and some listed are only appropriate in limited situations, it is clear the intent of the language is “e.g.,” In other regulatory situations, the inappropriate use of “i.e.,” was legally binding and required formal rulemaking to correct the error. Now is the time to make this change. The provisions in (2) c. are much too detailed for the Water Plan; use undefined terms and ambiguous language, and illustrate a clear lack of understanding of the complexity of and differences among the wide variety of industrial facilities in Georgia. Such specificity should be left to EPD to incorporate through their rulemaking and permitting processes. For example, in (2) c.iii, the current language requires the “measurement of all uses of reclaimed reuse or recycled water”. However, neither of these terms (reclaimed reuse or recycled water) is defined. Measuring “reclaimed water use” refers to a term which is defined in Section 2 and would not be unreasonable since the reclaimed water input to a facility is also a water input to the facility. However, measuring all “reclaimed reuse” (an undefined term that could be construed as all internal reuse of reclaimed water) or all “recycled water” (another undefined term that could be construed to mean all internal reuse), both of which would be impossible to measure for many, if not all, industrial facilities. And it is totally pointless information. The real metric of concern should be net water use/unit of production, with credit for reclaimed water use in lieu of fresh water. How much water one actually brings in and uses per unit of production is the key, regardless of how many times over it is used! Whether a facility is able to reduce water use by conservation or by internal recycle, the end result is reduced water use. Let economics within the facility dictate which is more feasible and cost effective. The requirement to “report on a regular basis” is ambiguous and unnecessary for such a high level policy document as the Water Plan. Water permit holders already have to submit semi-annual reports to EPD. Any needed reporting can be incorporated into that reporting by EPD as a condition of the permit. Leaving the inappropriate abbreviations in (2)c.i. uncorrected (leaving as i.e., instead of e.g., as discussed above) would severely

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	<p>limit the usefulness and applicability of this provision. · We have assumed, as discussed above, that (2) c.ii is a problem of poor wording, and that the intent is not extensive internal metering of every point of use of water. However, if that assumption is wrong (which could be construed by the subsequent wording in (2) c.iii) and the latter meaning was the actual intent, this provision is not workable, not cost effective, and would not provide any useful data. This line must be changed or deleted. We have proposed alternate language above. Section 8 (2) talks about conservation and efficiency use goals, including reporting on water efficiency for industrial facilities, but specific metrics are not mentioned. For industry, the Water Plan should state that metrics must be site-specific, but the general metric should be “water use per unit of production”, regardless of whether or not it is consumptive use as defined in the Water Plan. (Using consumptive water use as the metric would skew the data and make facilities supplied by groundwater, i.e., 100% consumptive use, appear very inefficient compared to those with surface water return, where only net use is considered.). The Water Plan must also recognize that this metric is meaningful only when compared among like-industries or for the same facility over time, since some businesses and industries are direct users (e.g., electric utilities, heavy industry, food production, and other facilities with more water-intensive processes) and others are indirect users who rely on the products of direct users as their raw materials and process materials (e.g., consumers of electricity, paper, chemicals, fuels, foods, containers & packaging), but nevertheless, depend upon such water use having taken place. Thus water efficiency can be assessed for a facility, but it should be for measuring improvement and not for comparison among dissimilar industries. For areas served by surface water, an additional metric of the % consumptive use would be useful for Regional planning purposes, but it is subject to the same constraints noted above, for comparison among like-industries, for the same facility over time, and for the same water supply regime (i.e., using surface water that can be returned to the receiving stream). However, even in such facilities there may be additional site-specific considerations to factor in as well, such as non-contact cooling water uses that do not impact measurably either water quantity or quality. Section 8 (2) talks about Monitoring and Measuring</p>	
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<p>water use for municipal users and other water providers but, like the overly burdensome language for industrial users, it does not include any discussion of metrics or water efficiency. For Municipalities and public water providers, an important metric is the water use per capita or per household. While there may be a lack of precision in the denominator, cities and water providers typically have a good estimate of the number of people/homes they serve. This metric would be especially important for comparison over time for the same city to monitor progress, but it could also provide useful information on achievable goals and best practices when compared to other cities' water use per capita. The metrics should include items like total water withdrawals to the system, net consumptive use, and use of reclaimed water and an estimate of the population served. In times of plentiful rainfall, the cities supplied by surface water can be more lenient, but unless the city's capabilities are known and mechanisms in place to reduce usage as water resources first begin to fall , the current drought crisis in the metro-Atlanta area will repeat itself there or in other growing cities in Georgia. Section 9: Water Return Management Practices The discussion of land application systems (LAS) is much improved over the June draft, where the water quality considerations for LAS were virtually ignored. Particularly in areas where there is no large receiving water to provide assimilative capacity, LAS are a vital waste management tool to protect the instream water resource quality, even where it may not provide a fast return to the receiving stream. While quantity should be considered in permitting decisions for deciding between a LAS or a direct discharge, in the end, water quality must trump. Section 10: Water Supply Management Practices: The Surface Water Storage: Implementation Actions: The buying and selling of water by utilities across basin boundaries or water supply resources should be prohibited or at least, strictly limited. The water resource does not belong to the utility, whether public or private, to "sell" and regional /downstream users should not have their resources diverted to the highest bidder. It is particularly important that water from the Floridan aquifer and other groundwater resources not be diverted north of the fall line where surface water is the principal supply, due to the inability to replenish those groundwater resources in any reasonable time frame (i.e., often greater than 50 year planning horizons).</p>	
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	<p>Groundwater levels in the Floridan aquifer have fallen steadily over the last 30 years across the state, not just in the coastal areas. This has already been manifested in diminished base river flows in the Flint and Suwannee river basins, where there is a hydrologic connection between surface and ground waters, impacting both human activities and aquatic habitat. Language in the Policy and implementation must state this limitation explicitly. Interbasin Transfers The interests and needs of all Georgia's citizens, regional economics and eco-systems must be given equal protection, and the resources of a particular region should not be diverted to another region just because of greater political or economic interests in that region. Interbasin transfers should be limited to surface water only and should be a means of last resort, or used only when there is a surplus of water in the donor basin. Specifically, all feasible measures to manage, conserve, reuse, reclaim and reduce water use in a particular region must be made before any inter-basin transfers should be considered. Such things as advanced wastewater treatment and reuse have been successfully implemented in other areas of the nation with a chronic shortage of water supply. This level of treatment should be required of all centralized municipal wastewater with return of the reclaimed water to reservoirs and/or dual plumbing systems for sanitation devices and outside water use; along with adoption with strict enforcement of water conservation standards/goals, and demonstrated reduction and maintenance of per capita water use for municipalities and per unit production water use for industry and commercial users as standard requirements before entertaining any long term interbasin transfer scheme. It may even be necessary to impose temporary moratoriums on increased water withdrawals, (such as was done in coastal counties), until water use is managed at or below the resources available for that region. The language in (2)b.i. is much too weak and should be strengthened to say interbasin transfers are considered a means of last resort, and that actions such as those listed above are mandatory first steps. Proposed language is as follows: " i. Determination of whether or not the applicant's proposed use is reasonable, including consideration of whether the applicant has implemented all feasible, cost-effective water conservation practices, achieved reasonable water conservation goals, has explored all potential use of reclaimed</p>	
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	<p>water supplies and implemented it where practical, and the municipalities in the receiving basin have or are in the process of installing advanced water treatment systems to provide reclaim water for direct use and/or for return to the upstream water supply.” Aquifer Storage and Recovery This section addresses the potential alternative for aquifer recharge. It bans such recharge from being considered for Counties under the Georgia Coastal Zone Management program. This ban on recharge to the Floridan aquifer should apply to all Counties throughout the State and not be limited to the Coastal Counties. This resource is much too important throughout south Georgia and Florida to risk contamination. Item (1) under this topic should be changed to read “O.C.G.A subsection 125-5-135 prohibits the injection of surface water into the Floridan aquifer in any county governed by the Georgia Coastal Zone Management program, created by O.C.G. subsection 12-5-327, until December 31, 2009. This prohibition should be expanded to the Floridan aquifer in all counties in Georgia to protect this valuable resource, and the deadline of December 2009 should be extended indefinitely until such time as ASR has been proven as a viable technology without risk of aquifer contamination in other less critical aquifers” Section 12 Enhanced Water Quality Standards and Monitoring Practices This section recognizes the issues created with “impaired waters” due to many “one-size fits all” water quality standards, and is a very important discussion. The discussion of looking at the site- specific water quality conditions is on point. However, the provision to add yet another water quality designation should be eliminated, for two reasons: First, the current Georgia rules and EPA requirements provide for anti-degradation requirements in permitting any new or expanded discharge into a high quality water (i.e., one exceeding standards). Thus, the means to achieve the objective of this provision is already in place and redundancy is not necessary. Secondly, if situations change and problems occur due to non-point source pollution that result in the lowering of water quality below the new standard, but still above the current standards, the stream is then “impaired” even if it is better than the current standards. Thus such higher standards create the same dilemma of “impairment” that the balance of this provision is attempting to solve. For these reasons, Policy Item (2) and Implementation Action (2) should be deleted in entirety. Section 14</p>	
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	<p>Regional Water Planning There is a glaring omission in the make-up of the Water Planning Councils, and that is omission of the regulated community as participants in WPC activity in all of the various discussions. For example, as noted earlier in comments for Section 8, the overall lack of understanding of industrial processes is very apparent in the Water Plan, and without that kind of knowledge, the planning process will be fatally flawed. The regulated community also includes the municipal water providers and treatment plant operators, businesses, industrial and agricultural interests, local governments and community representatives. This is where the knowledge about water needs, plans for growth, and current and future capabilities to provide adequate water resides, and they must be integral part of the planning process as members of the various Water Planning Councils. Another major flaw is the current plan for yearly review process. This is overly ambitious and totally unnecessary as a general rule. In locations where there is already a severe water supply problem such as the Coastal Counties or the metro-Atlanta area, more frequent assessments may be needed until the situation is under control, but a five –year review cycle is far more reasonable and workable as the normal cycle. And lastly, Water Planning Councils meetings and decisions must be transparent and open. Meetings should be open to the public with proper notice of impending milestones and decision points; policies and procedures that will become binding Memorandum of Agreement must be public information prior to the WPC commitment with opportunity for public input, and any decision on adoption of regional water development and conservation plans should have a minimum public notice of 45 days to allow public review and comment. Any specific regulatory requirements for the regulated community that may come out of the plan must be adopted by DNR through EPD. Otherwise, the WPC will usurp rulemaking authority that rightly belongs to EPD along with the due process that comes with the rulemaking process.</p>	
john hughes	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>A suggested overview of "required reading" should include 10/21 NY Times Magazine, "The Perfect Drought" by Jon Gartner, as it is a significant reality</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action</p>

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	check for us all!	was taken as a result.
Tanya Georgia Power	<p><i>10/30/2007 2:20:11 PM INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>On behalf of Georgia Power, I am submitting comments on the draft Statewide Water Plan (“Water Plan”) as revised September 13, 2007. As the largest provider of energy to the state, Georgia Power recognizes the importance of managing our valuable water resources in a manner to protect the state’s economy, public health and the environment, and to enhance the quality of life for all citizens. Water is a vital component of providing the energy for over 2.3 million customers in our state. As you know, our company has been actively involved in the Water Plan process through participation in the State Advisory Committee, Basin Advisory Committees and other meetings to discuss water planning issues. Additionally, we submitted comments on the first draft water plan dated June 28, 2007. We appreciate this opportunity to submit constructive comments on this draft of the Water Plan. We recognize the tremendous amount of effort put forth by you, as Chairman of the Water Council and Director of the Environmental Protection Division (EPD), and EPD staff throughout the last two years in producing this draft plan. We commend EPD for its efforts and believe the draft plan contains key components of good water management policies. We also thank you, Water Council members, EPD and Water Council staff for their diligent work in reviewing the submitted comments on the plan to date and those filed by the comment period on October 30, 2007. We offer these comments in the spirit of cooperation and continuing to refine this draft document. Since our August 17, 2007 comments, the Attorney General issued a formal legal opinion that the Water Plan should not be written as enabling rules and regulations. A revised Water Plan, as a stand-alone plan, was issued on September 13, 2007 and formally public noticed on October 1, 2007. While some of our August 17, 2007 comments have been addressed in the September 13, 2007 revision, others have not. We respectfully request that our comments, as well as all stakeholder comments, be reviewed and reasons provided for including or not including those</p>	<p>In October and November, designees of Water Council members worked jointly to review all of the public comments received during the August and October public comment periods. These comments were compared against the September 13th draft. Actionable items were bundled and forwarded to the Water Council for consideration, with recommended language changes where possible.</p> <p>The Council met on November 8th, November 20th, and November 28th to discuss and act upon the review packets provided by the designees. Council members also introduced proposed revisions themselves.</p> <p>The Council adopted a large number of changes that, in total, represent significant revisions in the September 13th draft. These revisions are shown in the</p>

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	<p>comments. Additionally, it would be helpful if those reasons could be provided before any new comment period or final vote on a revised plan. We urge the Water Council to take serious consideration of these comments for inclusion into the revised draft that will be discussed at the November 9, 2007 meeting of the Water Council. We are concerned that substantive stakeholder comments are not being fully vetted until such a late date in the process and that adequate time to fully consider stakeholder comments may not be available. We are providing a summary of our comments and providing specific actionable changes as listed, or as referenced in Attachment 1, that can be made in the draft water plan. All references in Attachment I to pages in the September 13, 2007 draft water plan are the "clean" document as opposed to the red-lined version.</p>	<p>December 5th draft that is currently under going a final round of public review and comment.</p>
<p>Kevin Colburn American Whitewater</p>	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Nowhere in the introduction is the word "recreation." This omission is far from trivial in an era of increasing childhood and adult health problems relating to inactivity. Georgia's rivers and streams provide backyard outdoor recreational opportunities for residents and visitors. Boating, fishing, swimming, and wildlife viewing, and scenic hiking are all supported by healthy rivers, and diminished as rivers become less healthy. Decisions made to dam and/or divert rivers and streams will directly impact public recreational opportunities that are protected under the Clean Water Act. The planning process must recognize the role that instream flow play in river based recreation, and the role that river based recreation plays in personal health and in some cases community economic viability.</p>	<p>Recreational use is explicitly included in the definitions of human use and instream use of water, and the plan is intended to be inclusive of the full range of water uses. Recreational use is clearly be among the uses to be considered in the more detailed planning that is expected to occur at the regional level, and this comment provides information that will be useful in development of guidance for regional planning, once the statewide plan is adopted.</p>

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<p>Charles T. Hall, Jr. GA Fruit & Vegetable Growers Assn.</p>	<p style="text-align: center;"><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please note I have also submitted these comments via email to Arnettia Murphy at DNR. October 30, 2007 Dr. Carol Couch Director Environmental Protection Division Georgia Department of Natural Resources 2 Martin Luther King Boulevard 1152 East Tower Atlanta, Georgia 30334 Dear Dr. Couch, These comments are submitted on behalf of the Georgia Fruit and Vegetable Growers Association (GFVGA). GFVGA is a trade association representing over 350 fruit and vegetable growers in Georgia. 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. It cannot go unsaid this is an industry that would cease to exist without availability to water and water resources. The GFVGA Board of Directors and membership expresses appreciation to Dr. Couch and the Water Council for the long hours and countless meetings conducted across Georgia in the development of this plan. 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. We are confident the final comprehensive water plan will ensure resources will be available to serve future generations of Georgians. GFVGA supports the development and implementation of a comprehensive statewide water management plan that maintains the vision of the policy statement signed by Governor Sonny Perdue, "Georgia manages water resources in a sustainable manner to support the state's economy, to protect public health and natural systems, and to enhance the quality of life for all citizens." We also continue to support state regulation that states, "During emergency periods of water shortage, the Director shall give first priority to providing water for human consumption and second priority to farm use." We believe a comprehensive plan is the only way to ensure quality water resources will be available for all future generations. The Georgia Fruit and Vegetable Growers Association support the following recommendations and/or additions to the Plan: 1) The Plan should serve as guidance to achieve the goals of water use efficiency, water quality</p>	<ul style="list-style-type: none"> • The December 5th draft includes revisions to clarify the definition of human use and to clarify that the plan does not change existing statutory provisions, including those that establish water use priorities during times of shortage. The priorities established by statute are now listed. • In the December 5th draft, <i>Implementation of Regional Water Planning</i> has been revised to provide information on phasing of implementation with a timetable. • The comment makes several suggestions or observations that are generally consistent with the approach taken in the current draft: importance of, and approach to, collection and assessment a range of information on water quantity and quality, pollution prevention planning, and the importance of regional planning at the direction of regional water planning councils. • This comment raises issues that are being considered in preparation of the water conservation implementation plan
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	<p>protection, water conservation, improved water resource inventory through augmentation, and a process for planning at a regional level. 2) The Comprehensive Statewide Water Management Plan should be implemented with a phased approach to ensure the necessary data collection is accomplished and to strengthen prospects for passage, funding and execution. A) Phase One (Phase 1) of implementation should include: i) Collection and assessment of water quality and quantity. One of the “guiding principles” of the Water Council has been to ‘develop a comprehensive and accessible database to provide sound scientific and economic information upon which effective water management decisions can be based.’ Collection of this data as well as existing data will support regional planning, comprehensive water management and the development of baseline water usage statewide. Many members of GFVGA, as well as others in the agricultural industry, began several years ago participating in the well monitoring program. This data will help establish baseline water usage and show how much water, as an industry, farmers are using and saving. We believe it is necessary to continue and expand funding of existing programs, such as those programs offered by the Georgia Soil and Water Conservation Commission that aid in the development of baseline water usage. These programs include the 1) Agricultural Water Use and Metering Program utilizing water meters on agricultural wells to monitor the amount of water being used, 2) Irrigator Gateway, an interactive tool allowing irrigators the ability to record real, on the farm water use and a benchmark to evaluate their irrigation efficiencies, and 3) the Georgia Ag Water Conservation Initiative Irrigation Reservoir Incentive Project which enables farmers to participate in a cost-share program to build water reservoirs on their farms for irrigation. In addition to data collection, monitoring programs of all data should be established to ensure integrity and timeliness. ii) Development of a Conservation Measures and Initiatives. GFVGA supports a Plan that recognizes Georgia’s system of regulated riparian rights and protects the rights afforded to water permit holders. This Plan should also ensure agricultural water use both for production and processing is second only to human needs. Goals of water conservation must include the participation of all water users where practicable and not encourage conservation of practices considered to be consumptive uses</p>	<p>and may be considered in action by the DNR Board following completion of that plan.</p> <ul style="list-style-type: none"> • The sub-section on surface water storage has been substantially revised in the most recent draft. Among other elements, revisions more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans. • The comment also raises several issues that may be addressed during regional planning. • Language has been added to the December 5th draft regarding public review and comment on the resource assessments. • Language regarding state funding has been added to the December 5th draft (at the end of 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.
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	<p>more so than those that are considered non-consumptive. iii) Pollution Protection Planning. The GFVGA supports implementation of a monitoring program to survey the waters of the state, to assess water quality conditions and compliance with water quality standards. iv) Supply Augmentation. The Plan must include reservoir management goals to address expansion of existing reservoirs, locations for and construction of new reservoirs and storages both on and off-stream, and efficiency in planning, permitting and construction. Management of reservoirs, as well as general Plan implementation, must take into consideration the economic impact regarding future requirements of water uses and permitting, forecast impact of population and industry growth, and weather pattern variability. v) Land Use Planning. Water re-use should be encouraged through future water use planning initiatives. This includes the capture and use of storm water as well as encouraging contractors to institute systems to recapture water and reservoir development in the design of subdivisions and buildings. Research of the systems and tools implemented by other states and countries that conserve and recycle water resources should also be researched and applied to Georgia. B) Phase two (2) of implementation: a. Regional Water Planning Councils. GFVGA does not believe a Statewide Plan written and implemented by one governing agency will be able to effectively meet the needs and intricacies of regional water concerns across Georgia. That Plan would be very general and vague thereby creating ineffective policies and legislation. We support the creation and utilization of regional planning councils, to further strengthen the currently proposed Water Plan. Regional water councils will ensure resource-based plans identify management practices appropriate to the resources and users in each region. Each water planning council will prepare regional water development and conservation plans for each water region across the state as a means to assure the long-term, sustainable availability of water supplies and assimilative capacities. Regions should be delineated based on hydrological boundaries, infrastructure interconnections, and other factors. Each council should be designated by the Environmental Protection Division (EPD) of the Department of Natural Resources (DNR). The EPD will give guidance and technical assistance to regional councils. Agricultural representatives should serve on all regional water</p>	
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	<p>councils and planning committees. In addition, the creation of an advisory committee made up of technical experts and additional people in the planning area that represent stakeholder groups may be considered as a way to ensure all parties are represented to the regional councils. This committee would not be a voting or policy making entity. Its sole purpose would be to expand the “brain-trust” of the regional council. The advisory board can be made up of as many or few people to act as a sounding board. The entirety of the implementation of the regional councils and plans is fully outlined and discussed in the submitted Georgia Agribusiness Council comments to the Water Plan of which GFVGA supports.</p> <p>b. Water Quantity and Water Quality Assessments For each water resource the EPD should complete an assessment of the water resources’ capability for water supply and assimilative capacity based on the scientific research compiled in Phase One. Benchmarks of water quality and quantity must be created and reviewed as well as any discussion and adoption of amendments by the Director of EPD and the Council. 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. GFVGA is concerned the process of legislative action is to first vote on the Plan and then establish and vote on a statewide budget. This allows for opportunities to minimize the necessary budget thereby diminishing the effectiveness of this Plan. We are confident the Council, Director and citizens of Georgia will continue to work together to make certain the development of a comprehensive statewide water management plan that will ensure water resources are available to future Georgians. On behalf of the officers and directors of the Georgia Fruit and Vegetable Growers Association we express our appreciation to the Council and Director for the opportunity to provide these comments. Sincerely, Charles T. Hall, Jr. Executive Director</p>	
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<p>Jose Blanco</p>	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>The plan should include the powers of the EPD to be the sole voice informing the populace of the water dimension, its status, problems, and progress, keeping it away from politicians, elected officials, or planning commissions. The citizens of the State of Georgia must look up to the entity that protects and manages this resource for them: this is not a political - whimsical - function.</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>State Water Group</p>	<p><i>10/30/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>October 30, 2007 Dr Carol Couch, Chairperson Georgia Water Council 2 Martin Luther King Jr. Drive Suite 1152, East Tower Atlanta, Georgia 30334 Dear Dr Couch: Draft Comprehensive Statewide Water Management Plan September 13, 2007 Version Attached are consensus-based comments from a number of statewide organizations regarding the draft Comprehensive Statewide Water Management Plan dated September 13, 2007. As you are aware, these organizations and others have been meeting in an attempt to reach consensus on various issues relating to the State Water Plan. Similar to our prior submissions dated April 18, 2006 and December 6, 2006, we thought it would be most useful to combine these comments into one consensus document, rather than the Water Council receiving numerous individual letters reiterating the same issues. It is important to note that any issues specific to an organization that are not contained within these comments may be addressed separately. We remain committed to assisting the Water Council and the Environmental Protection Division (EPD) in the development of a fact-based and successful State Water Plan and these comments are submitted as constructive, actionable items as requested. Attached is an Executive Summary, appendix of actionable items and an edited version of the September 13 2007 draft State Water Plan. Identified in the Executive Summary are nine priority issues and recommendations that we consider as vitally important revisions to the State Water Plan. The need for a State Water Plan has never been more evident than now and we, as water users across the State, recognize the opportunity before us to plan for our future. We appreciate the hard work of the Water Council and EPD and would welcome the opportunity</p>	<p>The following changes in the December 5th draft were made in response to this comment and a number of related comments:</p> <ul style="list-style-type: none"> • The guiding policies in <i>Section 1: Purpose</i> section has been revised to clearly state the intent to meet a all reasonable current and future water needs of the state. • Language regarding state funding has been added to the December 5th draft (at the end of 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.

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	<p>to further discuss these priority issues with you and members of the Water Council. Sincerely, American Council of Engineering Companies of Georgia Georgia Industry Environmental Coalition Council for Quality Growth Georgia Mining Association Georgia Agribusiness Council Georgia Municipal Association Georgia Association of Water Professionals Georgia Poultry Federation Georgia Chamber of Commerce Georgia Pulp and Paper Association Georgia Coalition for Sound Environmental Policy Georgia Traditional Manufacturers Georgia Chemistry Council Association Georgia Engineering Alliance Metro Atlanta Chamber of Commerce Georgia Forestry Association Regional Business Coalition Georgia Industry Association Urban Agriculture Council Georgia Beverage Association</p> <p>Priorities in the Executive Summary The Statewide Water Plan must: 1. Meet all water needs of the State; 2. Receive full funding from State sources; 3. Support and expedite additional water supply sources; 4. Provide flexibility in consumptive use budgets; 5. Include economic analysis of problems and options; 6. Allow permit decisions to proceed while data collection and planning occur; 7. Consider water return management practices on a case-by-case basis; 8. Provide flexibility for DNR Board to adopt and modify rules; and 9. Preserve regulated riparian rights. Detailed information on amendments required for each of the priorities outlined below can be found in the attached Appendices. 1. Meet all water needs of the State. The legislature's policy statement in HB 237 (2004) is the following: "Georgia manages water resources in a sustainable manner to support the state's economy, to protect public health and natural systems, and to enhance the quality of life for all citizens." The State Water group believes that economic development and environmental quality can and should go hand-in-hand. However, the draft Plan appears to focus on protection of natural systems foremost while potentially delaying and even foregoing new water supply opportunities. The State Water Plan should be outcomes focused and guide the way to having enough water to meet the water needs of our local governments, businesses, industries, farms, and the environment now and in the future. Further, the Plan should recognize the importance of existing water users and the</p>	<ul style="list-style-type: none"> • The sub-section on water supply reservoirs has been substantially revised in the most recent draft. Among other elements, revisions clarify the focus on water supply reservoirs and clarify the water conservation provisions listed under full consideration of water supply alternatives. A state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans is more clearly defined. Finally, the provision regarding "full-yield" of reservoirs was revised to indicate a preference rather than state a prohibition. • Language has been added to clarify that statutory provisions for permitting of water withdrawals and wastewater discharges, including provisions recognizing economic consequences and preference for existing water user, that will remain in place. Language has also been revised to improve consistency with statutory provisions regarding consideration of economic and technical factors
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	<p>economic consequences and potential conflict of choosing between current and forecasted water demands. This conflict is best resolved by cross-references to current law and its system of classification of competing uses and factors, which takes into account “economic consequences” to existing businesses under O.C.G.A. Section 12-5-31(e), and the business necessity of such existing use under O.C.G.A. Section 12-5-96(d). 2. Receive full funding from State sources. The need to plan for the future to ensure that current and future generations have access to adequate supplies of quality water that support both human needs and natural systems is a collective responsibility of all Georgians that should not be borne by individual permittees. Therefore, it is recommended that full funding as required for the statewide planning activities, development of all Water Development and Conservation Plans and the establishment and operations of Regional Water Councils be appropriated by the General Assembly (and supplemented by any appropriate federal funds) and that such costs should not be passed down to permittees in the form of fees or permit requirements. It is also recommended that a comprehensive Budget and Implementation Plan for all stages of the State Water Plan be included as an integral part of the Water Council’s final Water Plan. 3. Support and expedite additional water supply sources. Conservation alone will not provide adequately for future water supply needs. The current draft Plan recognizes the importance of water supply and that additional surface water storage is needed to supplement the capacity of streams to meet water supply needs in parts of Georgia. However, the draft Plan proposes stipulations governing reservoir development that would lengthen the time for permitting and construction. The current drought underscores the need for rapid development of additional dependable water supply in much of Georgia. It is essential that the cumbersome process of reservoir permitting be streamlined. The State of Georgia should implement processes that significantly expedite water supply reservoir permit applications, without duplicating processes required by the federal government. 4. Provide Flexibility in Consumptive Use Budgets. The draft plan proposes the use of “Consumptive Use Budgets” that utilize “dry year” water availability to determine the total amount of water available for water users and offstream uses. This water will be drawn from available water beyond the</p>	<p>in decisions regarding water quality standards and permitting.</p> <ul style="list-style-type: none"> • Language has been added to clarify 1) how consumptive use budgets would relate to regional planning and to permitting decisions and 2) how water use would be planned and managed in normal or wet years, given that consumptive use budgets are based on dry year conditions. • A guiding principle has been added to clarify that water management decisions, including permitting decisions, will continue to be based on the best information available at the time and on the laws, rules, plans, and administrative procedures in place at the time. • In <i>Section 9: Water Return Management Practices</i>, language has been added to clarify the intent regarding benchmarks for return flows. • Language regarding Board rulemaking has been revised to provide flexibility and clearly
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	<p>quantities needed to meet in-aquifer or downstream flow regime requirements. This is too conservative of an approach to planning which will not allow for increased availability of water as flows rise above the “dry year” flow sequence. Therefore, water withdrawal permits should provide the option for variable water withdrawal amounts based on prevailing water source stream flows or aquifer levels. 5. Include economic analysis of problems and options. Comprehensive statewide water planning should not be completed without consideration of the costs and benefits of the various options proposed for meeting the State’s long-term water needs. A necessary feature of each Water Development and Conservation Plan must be the conduct of an independent and public benefit/cost analysis of all aspects of each Plan. 6. Allow permit decisions to proceed while data collection and planning occur. Improving the scientific and economic information base for water management is critical to supporting current and future human use of water and the needs of natural systems. The starting point for implementation of the State Water Plan must be the completion of Water Resource Assessments for all watersheds. It is crucial that all future planning decisions be based on current, accurate, and both hydrologically and scientifically robust data relating to: • supply; • current usage; • future demand projections; • assimilative capacities; • sustainable yield; and • environmental requirements. While this information base is being improved, decisions by EPD must continue to be based on the best information available at the time and on the laws, rules, plans, and administrative procedures in place at the time. 7. Consider water return management practices on a case-by-case basis. The preferred fate of treated wastewater is highly dependent on numerous factors, and should be determined on a case-by-case basis, in the context of an integrated water policy as described in Section 3 of the draft Plan, taking into consideration both water quantity and water quality issues. The impact of land application systems and onsite management systems should consider the results of the evaluations discussed in Section 6 of the draft Plan to include the extent to which they return flows to the subject source, and the temporal and spatial implications of such returns. However, the Plan should not set planning benchmarks for return flows from Land Application Systems (LAS) systems that can become permitting criteria.</p>	<p>recognize the rulemaking authority that current statutes give to the Board of Natural Resources.</p> <ul style="list-style-type: none"> • Language has been added to the December 5th draft to clarify how statements about natural systems and biological integrity might be interpreted and applied to permit holders. • The foundation of the regulated riparian legal doctrine and provisions regarding reasonable use is explicitly stated at the outset of the plan. The December 5th draft also incorporates a number of text revisions to underscore that language. • The section titled <i>Implementation of Regional Water Planning</i> has been revised to provide information on phasing of implementation with a timetable.
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	<p>Until more is known about return flows from these operations, such benchmarks as described in the draft Plan should not be a criterion in new or expanded permitting decisions for LAS systems. 8. Provide flexibility to DNR Board to adopt rules. Since its creation in 1972, the Board of Natural Resources has shown that it is very capable of setting policy and promulgating environmental regulations. The State Water Plan will stand as valuable guidance to water management in Georgia, but it cannot and should not direct the Board of Natural Resources to specific actions. The State Water Plan will introduce many new concepts that will need adjustment over time, and the DNR Board should be free to make these adjustments without burdening the General Assembly with management and oversight of DNR actions. It is sufficient for the State Water Plan to recommend actions and let the Board of Natural Resources consider and adopt rules as necessary to implement the Plan. 9. Preserve regulated riparian rights. The regulated riparian legal doctrine and provisions regarding reasonable use of water must continue to guide water management and use in Georgia. The draft Plan can be interpreted as hampering regulated riparian rights; therefore, several minor changes need to be made to ensure that riparian rights are not impaired. RECOMMENDATIONS: The Water Council should adopt the following changes to give effect to the priorities recommended by the State water Group: 1. That the purpose of the State Water Plan is to meet all reasonable current and future water supply needs of the state. These needs include but are not limited to the sustaining of the State's cities, counties, rural communities, farms, businesses, industries and the environment. 2. That funding for statewide planning activities, development of all Water Development and Conservation Plans and the establishment and operations of Regional Water Councils be appropriated by the General Assembly and that such costs should not be passed down to permittees in the form of fees or permit requirements or charges. 3. That a comprehensive Budget and Implementation Plan for all stages of the State Water Plan be included as an integral part of the Water Council's final Water Plan. 4. That the State of Georgia implement processes that significantly expedite water supply reservoir permit applications, without duplicating processes required by federal programs. 5. That adaptable flow management be introduced</p>	
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	<p>to provide variable water withdrawals when prevailing water source stream flows or aquifer levels rise above “dry year” flow sequences. 6. That prior to their adoption, an independent and public benefit/cost analysis is completed and published for each Water Development and Conservation Plan. 7. That the starting point for implementation of the State Water Plan must be the completion of Water Resource Assessments for all watersheds. While these Assessments are being completed, permitting decisions by EPD must continue to be based on the best information available at the time and on the laws, rules, plans, and administrative procedures in place at the time. 8. That the DNR Board be provided flexibility to adopt and modify its rules and regulation to address the objectives covered in the State Water Plan. 9. That the State Water Plan reinforce the preeminence of the regulated riparian legal doctrine and existing provision regarding reasonable use of water. Suggested edits to the September 13, 2007 draft are available on file with this submission. Also included is an appendix cross-referencing the suggested edits with the nine priorities outlined in this executive summary.</p>	
<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 INTRODUCTION TO STATEWIDE WATER PLANNING</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>This comment may provide information for consideration during implementation of the statewide plan and preparation of regional water development and conservation plans.</p>
<p>Sam Booher</p>	<p><i>10/8/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>- thank you for allowing me to send comments about the GA State Wide Water Plan. I have three quick points to make. First 1. Does everyone here remember in 1999? the Atlanta Developers tried to get a Pipe Line from the Tennessee River near Chattanooga to bring Tenn River water to Atlanta. Their Plan was killed by State of Tenn. in approximately 2000 This plan was followed in 2003 by their Legislative Plan to Privatize water in GA. Thank goodness for the wisdom of 108 County and City resolutions that say NO to privatizing GA water. That bad plan</p>	<ul style="list-style-type: none"> • The September 13th draft was revised, in response to this and related comments, to clarify that the statewide plan does apply to the Metropolitan North Georgia Water Planning District. Future revisions of the District's plans

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	<p>was killed. The Privatizing GA Water Plan was followed by their today's effort to get great qualities of water to Atlanta which is to pass A State Wide Water Plan This leads into my 2nd point 2. What we are talking about to day is NOT a State Wide Water Plan. The reason this is NOT a State Water Plan is because it has nothing to do with the waters of the State of Georgia. That is Other than to allow Inter-Basin Transfers of water to Atlanta. This Plan ignores the top three greatest users of the Waters of the state of Georgia - It ignores completely Agriculture, Ignores completely Electrical Power production and Ignores the largest users of residential water - the 16 counties around Atlanta -- The North Georgia Metro Water District. So how can we sit here and call today's plan a GA State Water Plan. Simple - it is a Plan that sole purpose is to legalize Inter-Basin Water transfers to Atlanta so that growth will continue unhampered and unchecked. This leads into my third point. 3. As long as there is a steady increase in allowable water to fuel Atlanta growth, poor transportation, congested roads, long commuting time, crime, poor schools, and dangerously polluted air will not slow or even impact growth in Atlanta. North GA Metro Atlanta Water District needs to be reminded they need to develop their own "Water Budget". Atlanta Legislators and residents needs to begin talking about "We have this much useable drinking Water" which will support "this large a Population". If we want to grow more homes and businesses then we will need to begin cutting our great waste in water. Atlanta Resident and Legislators need to persuade the North GA Metro Water District there is a Need to develop their own Water Budget and its Conservation Plan that will Measure existing water availability and existing population. Then in their Conservation Plan, bring existing Septic tanks on to the Sewer system, get serious about fixing leaks in the current system, stop lawn spraying by replacing it with drip systems or pine straw, price out excessive users by stepped up pricing. I am sure once North GA Metro Water District begins doing their job of implementing their Conservation Plan they will come up with a great water Conservation Plan, far better than you and I could develop for them. As they cut waste, they can build more homes. Last to accomplish this we just need to revoke the 2004 law that said to do this "so called State Wide Water Plan" that as written only impacts State residents that live outside Metro Atlanta -</p>	<p>will be subject to the same guidance as the regional water development and conservation plans, including resource assessments, as described in Section 14 of the draft plan.</p> <ul style="list-style-type: none"> • 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. • The provisions of the draft plan, including those regarding agricultural water use, follow the authority established by current statutes and the language is consistent with those statutes.
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	<p>- Not Agriculture nor Industry nor Metro Atlanta. Sam</p>	
<p>linda conover waterfront home owner & multi business owner</p>	<p><i>10/17/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Why can't you draw from more current data? The state of Georgia should charge for our water releases to Alabama and Florida. That money should go towards building more water reservoir and rebuilding the sewage plants. The state of georgia should prohibit any use of pestasides, fertalizers,weed killers that are not organic. The state should also stop any further permitting of septic tanks. I BELIEVE THIS IS THE MAIN PROBLEM FOR NON-POINT POLLUTION. The state should also charge hefty finds on any industry including sewage plants that discharge pollutants into the water. New developements should be mandated to install water treatment facilities from the storm water runoffs. Well permits should be halted on coastal areas to stop the poluting of the Aquifers</p>	<p>This comment recommends actions that are beyond current statutory authority and therefore, beyond the scope of statewide water plan; are being addressed by current programs; or are issues that are best addressed in regional planning (e.g., treatment of stormwater runoff)/</p>
<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>

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<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 3:48:17 PM OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>This section of the plan is full of incomplete/inaccurate information that does not need to be submitted as part of the water plan. There are many resource materials that provide appropriate and complete data regarding issues covered in the plan that are not referenced in this section. At best, this section should be viewed as reference materials and be piled among the many other resource documents that contain information about the industries, basins, economics, etc. regarding water uses in Georgia's diverse river basins. In short...it needs to be removed from the water plan.</p>	<p>The overview section is intended to be background material and should be used in conjunction with other reference materials that provide information of Georgia's water resources and resource use. It is not intended to be part of the comprehensive statewide water plan. That plan is presented as a separate chapter in the document titled <i>Georgia's Water Resources: A Blueprint for the Future</i>.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:29:36 PM OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>The extensive overview section of the draft water plan provided interesting information especially in terms of the profiles of Georgia's river basins and overall water use trends. However, information made available 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 will restate some of those items where appropriate in this set of comments. On page 9 of the summary, the revised draft still mentions that most of the water use by coal and nuclear power plants is not consumptive. That is not the case, especially as it relates to Georgia's nuclear plants. According to data in the draft plan, nuclear Plant Vogtle on the Savannah River consumes 43 mgd. With withdrawal figures of 64 mgd as reported to the GA EPD for 2001, Vogtle's consumption rate is 61%. According to data in the plan, nuclear Plant Hatch is the only significant water user on the Altamaha River, withdrawing 59 mgd and consuming 34 mgd—a 58% consumption rate. Additionally, some of Georgia's coal plants are large water consumers. For instance, in 2006 data reported to GA EPD, Plant Bowen withdrew an annual average of 43 mgd and</p>	<ul style="list-style-type: none"> • In preparation of the final document, references in the overview to water use by power plants will be reviewed and clarified. • Water quality across the state is impacted by a number of factors and it is beyond the scope of the plan to list some or all causes of water quality impairments. That information, however, will be an important component of regional planning. The comment raises other issues that will be important in preparation of regional water development and conservation

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	<p>consumed 32 mgd for a consumption rate of 75% while Plant Scherer had a 58% consumption rate—consuming an annual average of 33 mgd. We request that this section be rewritten to more accurately explain that Georgia’s nuclear plants are large water consuming facilities and that some of our fossil fueled power plants also have high water consumption rates and that collectively these high rates of consumption are important to consider in terms of water planning. Though the draft plan places emphasis on consumptive water use above overall water withdrawals, we believe that the large water withdrawals by the power sector are important to describe in more detail because there are negative impacts associated with water use, not just consumptive loss. Though Plant Branch has a reported annual average consumption rate of 0.3%, it’s average annual withdrawal is 1096 mgd—over a billion gallons of water per day—making it the largest water user in terms of power plants in the state and it may well indeed be one of the biggest water users in the entire state. Throughout the overview of the river basins, power plants were often listed as the largest water users but little else was described. There was little to no mention of the impacts of thermal pollution from the discharged water, of mercury contamination resulting from coal-fired power plants, or of chemical and radioactive contaminants being released into our waterways. As stated earlier, we request that a more thorough summary of the impacts from the electricity sector on our water resources be included in the final plan. Page 14 states, “In 2004, power plants in the Ocmulgee Basin withdrew approximately 94 mgd. Most of the water withdrawn for power generation is returned to the source.” Actually, 2004 data reported to GA EPD shows that Plant Scherer alone withdrew an annual average of 57 mgd and consumed 33 mgd. That consumption represents one third of the total water withdrawn by power plants that year in the basin; this reality should be stated as such. On page 26 regarding the Chattahoochee it mentions, “Water levels in the Corps of Engineers reservoirs, which are used for both drinking water and recreation, drop when large amounts of water are released into the channel to support navigation.” The energy-water connection is again relevant here, though in a different capacity. In early 2006, an order was issued by a federal judge that authorized slight reduction in flows in the Chattahoochee-Apalachicola-Flint (ACF) river basin. According</p>	<p>plans. For example, 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> <ul style="list-style-type: none"> • Language has been added to the December 5th plan to clarify that, like the statewide water plan, regional water development and conservation plans will be periodically reviewed and revised. Review and revision will include the resource assessments provided as guidance for regional planning. This review and revision cycle will provide an opportunity to respond to new information and changing conditions, including those predicted to result from climate change.
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<p>to an article written about the event, this was done “partly to satisfy a request from Southern Company, which asked for more water in upstate reservoirs to ensure normal operation of Alabama Power’s Farley nuclear plant, which draws cooling water from the Chattahoochee.” Given that Plant Farley also pulls a substantial amount of water and has fairly large consumption rates from the Chattahoochee, this should also be included more precisely in this river basin’s overview. According to information from the September 2003 license renewal application with the U.S. Nuclear Regulatory Commission, Farley withdraws an average of over 87 mgd from the Chattahoochee and returns approximately 46 mgd. Further, recent statements from Governor Riley of Alabama on the drought situation have further raised the water-energy connection on the Chattahoochee River. The Army Corps is also involved with releasing enough water to allow operation of the downstream nuclear power plant Farley and many other users. On page 28 describing the Coosa River basin, it states, “Power generation accounts for the largest withdrawals in the basin” referring to Plant Bowen and Plant Hammond and mentioned that the plants withdrew a combined 574 mgd from the Coosa and Etowah rivers for power generation with all but 34 mgd of that water returned to the source. Given that the Coosa River is the second most-used source for drinking water in the state having 34 mgd tied up by consumptive power use is important to recognize. To compare, the plan mentions that Cobb County, which lies outside of the basin, transfers 23 million of gallons of water per day (mgd) to meet their water supply needs and later discharges the water into the Chattahoochee River Basin. We again take exception to the description of Georgia Power’s role at the Tallulah Gorge State Park on page 36 during the description of the Savannah River basin, “Georgia Power periodically releases water from their hydroelectric lakes to show visitors the waterfalls that existed before the dams were built along the Tallulah River, as well as giving experienced kayakers the chance to experience the river’s rapids.” After this description, or at least somewhere in the plan, we suggest that the plan mention Georgia Power’s and other electric utilities’ role in negatively impacting our state’s water resources. Suggested language follows: Our existing electricity system impacts our water quality in a number of ways. Coal-fired power plants</p>	
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	<p>rank as the largest industrial source of airborne mercury emissions in Georgia. Its organic toxic form, methyl mercury, is a hazardous neurotoxin that contaminates Georgia's lakes and rivers and can make recreation and eating fish unhealthy, especially for pregnant women and young children. A variety of hazardous chemicals, heavy metals, and radioactive contaminants are released into surface waters during routine operations at nuclear power plants including: biocides; acids; phosphates; chromium; and tritium. Water discharged from nuclear and coal power plants can be warmer than receiving waters resulting in "thermal plumes" that can stress aquatic life in part by aggravating the problem of low dissolved oxygen levels. Additionally, in the case of a severe accident, nuclear plants have the capability of long-term contamination. As stated earlier, there was no mention of climate change in the revised draft water plan. As Georgia continues to grapple with how best to manage energy and water resources, how to plan for future growth, and how to become more resource efficient, the addition of planning for climate change impacts will help to ensure that the state's water and energy resources are developed and managed wisely. We encourage the Water Council to consider climate change implications as a necessary component of effective water planning.</p>	
Eric	<p><i>10/30/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Has anyone brought up the idea of removing soil from the lakes that are currently well below full pool? It seems to me that this would be a good cost-effective way to increase the future water supply when normal or excessive rainfall returns. If it were up to me, I would have dump trucks and excavators going around the shore of the lake below the usual waterline and removing a substantial amount of dirt, thereby creating more water capacity and also making it a safer lake for boaters. Just a thought.</p>	<p>This comment highlights a management practice that may be considered during regional planning. The regional plans can and should consider practices beyond those explicitly discussed in the statewide plan, and in some regions, dredging of existing reservoirs may be identified as an option for evaluation.</p>

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<p>Kevin Colburn American Whitewater</p>	<p><i>10/30/2007 3:35:43 PM OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>The maps and discussion do a good job of outlining consumptive, municipal, and industrial water uses in the basins, but does not adequately describe the recreational resources. Obviously the sheer volume of recreational use prohibits a detailed examination of the uses at this scale. We request that subsequent drafts and plans reference sources that will be used to determine onsite recreational uses and flow needs prior to decisions being made on specific water projects. We would like to offer that our website contains a detailed and relatively comprehensive database of whitewater boating opportunities in the state, complete with GIS information and reach descriptions. We encourage planners to rely on this information as a general source of information however caution that the opinions on specific flow needs and even reach descriptions are those of one or more individuals but not necessarily the consensus opinion of all paddling stakeholders. These data should be used as guidance but not as substitutes for stakeholder involvement and direct studies of instream flow needs for potentially impacted reaches. Our website is www.americanwhitewater.org and the database of rivers can be found at: http://www.americanwhitewater.org/content/River_state-summary_state_GA</p>	<p>The overview section is intended to provide general background material rather than a comprehensive review of Georgia's water resources and their use. It should be used in conjunction with other reference materials that provide information of Georgia's water resources and resource use, including the resources referenced here. The resources referenced here will also be useful in implementation of the statewide plan and regional planning, once the statewide plan is adopted.</p>
<p>Tom O'Bryant White County</p>	<p><i>10/30/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Thank you for the opportunity you provided for review and comment of the proposed Comprehensive Statewide Water Management Plan. Please find the attached comments on the proposed Plan on behalf of the White County Board of Commissioners White County comments on the proposed Plan were developed with guidance from the ACCG Natural Resources and Environment Committee 2008 Water Plan Policy Position. White County recognizes that statewide water management is a complex issue and that there is no "one size fits all" solution to address water quantity and quality needs. The comments below are issue or concerns from the ACCG recommendations that apply most to White County. • White County urges the Governor to budget and the General Assembly to appropriate and establish a constitutionally dedicated source of funding that will</p>	<ul style="list-style-type: none"> • Language regarding funding and the expected timetable for implementation has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). A dedicated funding source, however, would require statutory change and is beyond the scope of the statewide water plan. • A guiding policy was added to

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	<p>be used to successfully conduct the initial and ongoing water quantity and water quality assessments, data compilation, and regional planning administration. Without comprehensive, frequently updated and science-based data, and state funding to support these endeavors, the Water Plan will be incomplete and cannot succeed. • White County discourages EPD from basing water permitting decisions on Water Plan components, especially conservation and consumptive use measures, until the necessary water assessment data has been collected, compiled and carefully studied. Existing and near- future requests should be expeditiously processed using existing rules and policies. The consumptive use measures as presented will place White County and other developing communities at a competitive disadvantage in attempting to attract economic development. The majority of water users in White County are residential users that have on-site septic systems. White County has traditionally reserved its usage of wastewater capacity for industrial and commercial use and that is part of county long-term planning. Rugged steep terrain and available soils makes it economically impossible to extend wastewater services for residential growth. In addition, past and current State policy has directed local public and private wastewater systems in White County to discharge their wastewater through land application systems. The costs to retrofit these systems and to extend wastewater services to existing residential development in order to balance local consumptive use would economically and permanently hinder all future commercial and industrial development in White County. Consumptive use should include the discharge of wastewater into the ground water system through land application systems and on-site septic systems. • White County urges that Regional Water Planning Councils be selected by means other than the EPD Director's sole authority. • White County urges that Regional Water Planning Councils' voting bodies be composed of a majority of local elected officials as they are responsible for implementing regional planning efforts, ensuring compliance with other state and federal clean water requirements, and ultimately are accountable to the communities which they represent. • White County urges that prior to conservation measures and other required Water Plan management practices apply to neighborhood and community water systems and agricultural uses be</p>	<p>the September 13th draft to clarify that water management decisions must be based on the best information available at the time and on the laws, rules, plans, and administrative procedures in place at the time.</p> <ul style="list-style-type: none"> • In the December 5th draft, <i>Section 9: Water Return Management Practices</i> has been added to clarify that benchmarks for return flows may be defined on a regional basis and are not intended to be applied to individual systems or jurisdictions. The significance of return flows from septic systems and land applications systems will vary with the water source and across regions, and this factor should be considered during regional planning. • The provisions regarding water planning councils have been revised to specify an process for appointment by the Governor, Lt. Governor, and Speaker of the Georgia House. Revisions also state that each council will be broadly representative of water-
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	<p>subject to water conservation measures included in the plan, that such water uses be studied in more detail and their impact determined on the overall economic climate of the State, regional and especially local economy. White County has numerous fairly large private community systems that rely on deep well and tank storage. Most of these communities already have contracted conservation measures within their customer usage and credit should be given to local governments with such systems in place. Lastly, developing counties, such as White County, already practices conservation measures through the implementation of updated building codes and enforcement practices, requiring low flow water devices in residences and businesses. • Agriculture is the largest industry in White County. While some BMP conservation practices should be incorporated into agriculture, subjecting the industry the same conservation practices could severely impact the local economy. • White County urges that the emphasis of the State Water Management Plan should focus on building the storage of raw and treated water supplies, not heavy mandated conservation measures. The State should not leave the burden of developing water supplies solely on the local community to help provide for State needs. The current process for developing waters supplies, raw and treated, is costly, cumbersome and extremely time consuming. • White County urges the State Water Management Plan to focus more on water accountability within the systems throughout the state. Numerous large water users constantly seek additional water withdrawals without first reducing the extremely high percentages of water loss between the water treatment facilities and customer's meters. Seeking increases in water needs while losing up to one-half of treated water is a feudal practice that will subject the state and local governments to lengthy litigation as the state and local communities grow. If you have any questions regarding these comments, please contact either, Mr. Alton Brown, White County Manager or Mr. Tom O'Bryant, White County Director of Community and Economic Development at (706) 865-2235.</p>	<p>related interests, with representation tailored to reflect the differing economic and resource needs in differing regions.</p> <ul style="list-style-type: none"> • In the December 5th draft, <i>Section 8: Water Demand Management Practices</i> has been revised to address the points raised here and related comments regarding water conservation. • The sub-section on water supply reservoirs has been substantially revised in the most recent draft. Among other elements, revisions more clearly define a state role in provision of financial and technical support for multi-jurisdictional projects identified in water development and conservation plans.
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<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>Repeated comment: See above for response.</p>
<p>Martha McCarty</p>	<p><i>11/14/2007 OVERVIEW OF GEORGIA'S WATER RESOURCES</i></p> <p>In the early 70s, then Gov jimmy Carter and the US Army COE stopped a dam uilding project at Sprewell Bluff in western Upson County. Hindsight is 20/20. What a significant resorvior that project would have created on the southern side of metro ATL.</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>james scarbrough gwinnett water resources</p>	<p><i>9/28/2007 9:45:20 AM SECTION 1: PURPOSE</i></p> <p>There are sections in the second draft of the plan that are very detailed. We strongly recommend that the plan be limited to policy statements. This would leave the DNR Board the responsibility of promulgating rules for implementation of the policies. If the Legislature approves these detailed requirements and later some small detail needs to be changed, clarified or modified, having to go back to the Legislature will be a major impediment to the plan's implementation. There is no mention in the plan about the single largest influence of water yield in Georgia for several basins, namely the U.S.Army Corps of Engineers and how they manage federal reservoirs. If Georgia does not know how the COE will manage the reservoirs, we do not understand how we can predict the yields from these basins. We remain concerned about the funding for this massive data collection effort that is envisioned state-wide and if the resources will be provided to collect the necessary data to make the estimated water yields and assimilative capacities meaningful. Even if the needed data is collected there will still be substantial funding needed to prepare the Comprehensive Water Plans for each designated planning area. There must be a good data management system put into place to</p>	<ul style="list-style-type: none"> • The Water Council has chosen a different approach, providing additional detail so the intent and potential implications are clearer than would be provided in a plan limited to policy statements. • Revisions have been made to more clearer recognize the DNR Board's authority to promulgate rules, once the plan is adopted. • The operational practices of federal reservoirs will be considered in the resource assessments and regional planning for those areas which have federal reservoirs. If these operational practices change over time, revised

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	<p>manage this data, keep it current and available to all parties who need or want to use the data. We see no method for providing credit (increased withdrawal capacity) for water returned directly to the source for water suppliers like Gwinnett County that discharge reclaimed water back into the source from which their drinking water is taken (Lake Lanier). This credit should be provided on a one for one basis for a withdrawal permit increase. The position that this return flow should be available to all downstream users is a significant disincentive for the rate payers who have made the investment to treat and return the water to the source. It does not appear that water used by agriculture has been addressed in the second draft plan near to the extent that municipal; water supply and municipal wastewater has been addressed. Considering the significance of the comparable volumes of water use by agriculture, we believe that more attention should be given to how agriculture will share the burden of statewide water conservation.</p>	<p>resource assessments will be necessary.</p> <ul style="list-style-type: none"> • Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). • Credit for return flows is a tool that may be considered in regional planning. • The provisions of the draft plan, including those regarding agricultural water use, follow the authority established by current statutes and the language is consistent with those statutes.
<p>David Wilkes Citizen</p>	<p><i>10/25/2007 4:57:58 PM SECTION 1: PURPOSE</i></p> <p>This section states that the plan provides "concepts that are innovative for Georgia". These concepts do not go far enough in terms of innovation. They are intrastate and regionally-focused only rather than based on a statewide focus. Georgia needs to look at regionally-shared basins (such as the Savannah and the Tennessee) and begin the process of dialogue on sharing those resources with the other states in those basins. Georgia needs to begin to look at water resources as they are looked at in the western US; they are of regional value and mechanisms are in place for states to develop sharing policies and procedures. In the eastern US, the Interstate Commission on the Potomac River Basin (ICPRB) is a good example of regional cooperation on the sharing of water between states. Part of this management plan needs to incorporate regional sharing. It is not currently a part of the plan but is a major gaping hole that needs to be included in the final version. Stating in this section that the "plan will not change priorities for water</p>	<ul style="list-style-type: none"> • In response to this and related comments, general language regarding coordination with neighboring states has been added to the December 5th draft. More specific information may be included in guidance for regional planning in interstate basins, following adoption of the statewide plan. • Interbasin transfer is a tool to consider in the context of regional

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	<p>use, compel interbasin transfers, or favor one area of the state over another" constrains the ability of the state to provide water where it may be needed to "support the state's economy, to protect public health...and to enhance the quality of life for all citizens". A good example of a place where this constraint would have greatly diminished a state's economy is in California. 75% of the water resources in California are located in the northern third of the state and 75% of the demand is in the southern third. Visionary leaders in the state of California determined many years ago that it was important to supply water to the growing needs of the southern part of the state and developed the state water project to move water across basin boundaries to support economic growth and development in one part of the state instead of another. This massive public works project was a clear and decisive step in ensuring that the state's economy and quality of life would be supported by water supplies from one part of the state for the overall benefit of the state as a whole. Without this type of approach, California would not be the sixth largest economy in the world that it is today. It is clear in Georgia that the Atlanta Metro area is the economic engine of the entire state. To glibly provide this restrictive language and ignore this reality is to set up an untenable situation that constrains the state from potentially developing inter-regional water solutions that can help support the Metro Atlanta area with new water supplies and continue to fuel the main economic engine of the state. This is clearly a politically-incorrect approach given all of the voices that will cry foul from but it is a realistic approach that requires real innovation instead of the constrained innovation that is included in this plan. A final note on innovation is in the area of water reuse. This purpose and guiding principles section of the plan should include clear and decisive endorsement of water reuse in the state in all of its forms. This section specifically calls out "regional water development and conservation plans". It also needs to specifically call out "reuse plans". An integrated water management approach that does not include a reuse element is not integrated at all. The reuse concept may be imbedded in the "water resources" definition but it is as important and crucial as conservation and should be specifically mentioned as follows: "The third concept is the regional water development, conservation and reuse plans". Thank you for the opportunity to</p>	<p>planning, once resource assessments have been completed for individual water sources.</p> <ul style="list-style-type: none"> • Language has been added to the plan to recognize that relative benefits of water reuse will depend on the condition of individual water sources, including limitations on the availability of water and water quality concerns. Reuse is a tool that is best considered in regional planning and this comment provides information that useful in development of guidance for regional planning, once the statewide plan is adopted.
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	<p>comment on the plan. The state of Georgia needs to "think big" with this plan and not constrain itself through political correctness. It needs to look at what's best for the state as a whole and not restrict and compartmentalize the planning process. For the long-term future, it needs to look regionally for water from the Tennessee and Savannah Rivers to support the state's economic growth and public well-being, and it needs to do that in a cooperative, institutional effort with the states and other stakeholders that share those resources. Taking the "bigger picture" approach advocated by these comments will truly produce "a comprehensive approach to water management" that will serve the state well into the future.</p>	
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 4:02:11 PM SECTION 1: PURPOSE</i></p> <p>Some basic truths must be maintained as Georgia charts a path for statewide water management. These are that the Plan and future enabling regulations and statutes must recognize Georgia's system of regulated riparian rights and protect the rights afforded to water permit holders. Decision making must be made utilizing scientific assessments of water quantity and water quality and that this information is comprised of accurate, timely and up-to-date measurement, metering, monitoring and data collection. Agriculture water use, both for production and processing, must be second only to human needs.</p> <p>This draft of the plan fails to adequately consider the economic impact regarding future requirements of water uses and permitting. It is instead a resource protection document instead of the balanced approach required by HB 237, which stated the plan would hold the vision that "Georgia manages water resources in a sustainable manner to support the state's economy, to protect public health and natural systems, and to enhance the quality of life for all citizens."</p> <p>State funding sources and any available federal dollars must be utilized 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.</p>	<p>The following changes in the December 5th draft were made in response to this comment and a related comments:</p> <ul style="list-style-type: none"> • Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). • Language has been added to clarify that statutory provisions for permitting of water withdrawals and wastewater discharges, including provisions recognizing economic consequences and preference for existing water user, that will remain in place. <p>Language has also been revised to improve consistency with statutory provisions regarding consideration of economic and technical factors</p>

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		<p>in decisions regarding water quality standards and permitting.</p> <ul style="list-style-type: none"> • Language has been added to clarify that the plan does not change existing statutory provisions, including those that establish water use priorities during times of shortage. The priorities established by statute are now listed.
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:44:06 AM SECTION 1: PURPOSE</i></p> <p>The GWC agrees that water resources have finite assimilative capacities and that surface and ground waters are interrelated, as are water quantity and water quality. We are pleased to see EPD acknowledge this reality and hope that it translates into improved water management going forward. For reasons we will discuss later, we recommend that one additional purpose should be declared, if it is accurate: that this comprehensive statewide water plan is intended to direct water planning decisions statewide and is intended to govern other more localized planning areas and entities, such as the Metropolitan North Georgia Water Planning District (MNGWPD or the District) and the lower Flint River and Georgia coast, where water management plans already exist. While there is new language regarding the MNGWPD, there is nothing concerning the other areas. If the intent is that the statewide water plan apply equally to these areas, entities, and existing plans, this intent needs to be stated explicitly to minimize ambiguity and confusion among regulators and members of the public.</p>	<p>In the September 13th draft, language has been added to clarify that the statewide water plan applies to the plans of the Metro District, which are the only comprehensive regional plans that have been developed to date.</p> <p>The plans for the lower Flint and for the coast are not comprehensive regional plans. In preparation of water development and conservation plans, these plans will certainly have to be considered, along with existing local and multi-jurisdictional water or wastewater plans. Because these are not comprehensive regional plans, however, the proposed revision is not accurate.</p>

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<p>Virginia Holton Packing Corporation of America</p>	<p><i>10/30/2007 4:02:11 PM SECTION 1: PURPOSE</i></p> <p>Section 1: Purpose The section is well written and includes the basics of many of the conceptual comments above. As always, “the devil is in the details” but this section is an excellent starting point. In particular, recognition of the concept of consumptive use, and how the traditional concept is very different for areas served by surface water supplies (0% consumptive use is a possibility and relatively low % consumptive use is not uncommon) versus areas served by groundwater supplies (where water use is 100% consumptive use no matter how efficient) under the conventional definition of consumptive use.</p>	<p>This statement is generally consistent with the approach taken in the current draft.</p>
<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:24:02 PM SECTION 1: PURPOSE</i></p> <p>Purpose of the Water Plan The enabling legislation [OCGA 12-5-520, et. seq.] set forth the following policy statement for the water plan: “Georgia manages water resources in a sustainable manner to support the state’s economy, to protect public health and natural systems, and to enhance the quality of life for all citizens.” We believe the plan can be strengthened by specifically stating that a key policy is to meet all reasonable current and future water supply needs of the State of Georgia. While we believe the plan adequately addresses public health and natural system through policy statements and implementation actions – strengthening the commitment to meet reasonable water supply needs will balance all three components of the mandated purpose. Solution: See Attachment I, Recommendation #1.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<p>The guiding policies in <i>Section 1: Purpose</i> section has been revised to clearly state the intent to meet a all reasonable current and future water needs of the state.</p>
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:30:07 PM SECTION 1: PURPOSE</i></p> <p>(bottom of 2nd paragraph) The first is the use of thorough evaluation of resources, called Water Resource Assessments. We cannot effectively plan for and manage what we do not measure. Selecting the optimum water management strategies requires precise information about the capacities of our water resources. We must determine how much water we can withdraw consume from our major rivers, lakes, or aquifers without causing negative impacts; this amount of water</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource</p>

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	<p>is also called the sustainable yield. Additionally, we must give comprehensive analysis to the available water resources that could be utilized to augment the state's water supply. We also must determine the assimilative capacity, which is the amount of wastewater and stormwater streams can assimilate before water quality begins to degrade. EPD will begin the process of assessment by identifying the hydrologic boundaries of watersheds and aquifers to be used for assessment purposes. EPD will analyze existing information, and where when that information is not sufficient, undertake enhanced monitoring. As an adjunct to the comprehensive analysis of augmenting the state's water supply, we must likewise give comprehensive analysis to the impact and proper methodology for treating the waste created by this augmentation and its proper point of return to the natural environment. (3rd paragraph) The second new concept is the development of regional forecasts of water supply and assimilative capacity demands. These forecasts will be developed for planning regions that will be designed to reflect jurisdictional boundaries and economic interdependencies as well as hydrologic boundaries. Regional forecasts will be compared with the water resource assessments for each planning region so that areas that may face water challenges in the future can be identified. A package of resource development and management practices, tailored to local needs and resource conditions, can then be selected to meet those challenges. (4th paragraph) The third concept is the regional water development and conservation plans. These plans, which will be developed for all of the planning regions, will describe the water management practices including supply augmentation and wastewater disposition to be employed in each area. Since water resources, their conditions, and their uses vary greatly across the state, selection and implementation of management practices on a regional and local level is the most effective way to ensure that current and future needs for water supply and assimilative capacity are met. The management practices specified in the water development and conservation plans for each region will be supported by statewide guidance. (6th paragraph) 3. A regional water development and conservation plan will be prepared by EPD or by regional water planning councils. The plan will identify the management practices including augmentation to be employed to ensure that</p>	<p>assessments and forecasts of future demand. For those regions that do not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
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	<p>the forecasted regional water and wastewater needs can be met without exceeding the water quantity and water quality capacities identified in the resource assessments. In some situations, the regional water plan may identify management practices that will supplement the resource capacities in a manner that conforms to policies and criteria established by presented in this plan. The regional water management plans will be reviewed by the EPD, and if they are consistent with EPD’s established guidance, EPD will adopted them by EPD. (8th paragraph) • Provisions for regional planning to select the management and development practices that best fit the resource conditions and uses in different regions throughout the state. Finally, the rule establishes the regional water planning process, through which the majority of water management practices will be implemented. (Guiding Policies) (5) Water resources management must have a sound scientific foundation and recognize that economic prosperity and environmental quality are interdependent. As such, development of water resources not historically used for water supply will be critical to the state’s future (desalination/augmentation from the Tennessee River).</p>	
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 4:13:27 PM SECTION 2: DEFINITIONS</i></p> <p>We suggest, at the very least, the definitions of "consumptive use" and non-point source pollutant" be revised. Consumptive use does not take into account the filtration and migration of water through soils as it moves to surface water or ground water. Truly consumptive uses should only be those that cause evaporation or removal from the basin of origin. As for non-point source pollution, it unfairly lists fertilizers and pesticides when it should target impairments brought on by chemicals and nutrient loadings. It is appropriate to list nutrients and chemicals as pollution, but not single out fertilizer and pesticides.</p>	<p>The definition of nonpoint source has been revised in response to this comment. The definition of consumptive use has not been changed, as the revision suggested here would fundamentally narrow the meaning and the applicability of the concept. The term “consumptive use” is explicitly used here to focus on the net difference between withdrawals and returns to a defined surface water or groundwater system.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 SECTION 2: DEFINITIONS</i></p>	

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	<p>Again, the GWC appreciates the many additions to this section in response to our earlier comments. This section is still missing at least one term, and a few of the definitions need to be clarified to eliminate ambiguity: - “Conditions” is defined only in terms of pollution discharge. The definition should be expanded to include conditions that may be placed on water withdrawal permits. - “Conservation-oriented rate structure” is defined, but it lacks detail as to exactly what sort of rate structures will qualify. The definition should lay out how many tiers will qualify as a conservation-oriented rate structure, along with the general nature of those tiers. Alternatively, this information could be included in the water conservation section of the plan. An effective conservation-oriented rate structure should include at least three tiers. - “Consumptive use budget” should be redefined to substitute “instream” for “downstream” flow regime requirements. - “In-stream uses” needs to be further defined to include chemical and physical, in addition to biological, integrity. - “Management practices” should add “return of water to aquifers” in addition to surface waters. - “Recharge area” needs to be defined. - “Sustainable yield” should be further defined to elaborate on what is contemplated by “selective modification of the source.” The GWC does not believe that sustainable yield should be increased indefinitely through selective modification that includes new interbasin transfers (IBTs) or reservoirs; the idea of such modification flies in the face of the inherent meaning of sustainability, particularly if that term is defined to extend beyond a single water source. The GWC supports the linkage of sustainable yield with a water body’s physical, chemical, and biological integrity; however, we request further explanation of the meaning of “unacceptable” alteration of that integrity. - “Values and opportunities provided by historic flow patterns” is confusing; furthermore, "historic flow pattern" is undefined, so we don't know what EPD will count as historic. - “Water planning region” should be redefined to remove “as defined by the Director.” The GWC believes that such regions should be primarily based upon natural hydrologic boundaries. - “Watershed” should be redefined as the land area “draining to” a given point along a stream or river.</p>	<p>In the December 5th draft, several definitions were revised in response to this comment and/or other comments. Other elements of the comment address actions that will be part of implementation, once the statewide plan is adopted.</p>
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<p>Virginia Holton Packing Corporation of America</p>	<p><i>10/30/2007 SECTION 2: DEFINITIONS</i></p> <p>Section 2: Definitions PCA recommends the following improvement in the definitions section. The “Water Reuse” definition should be changed to also include an explicit reference to internal water reuse within a facility. Many industrial applications have implemented extensive internal reuse practices that substantially reduce net water use, but without meeting the definition of “reclaimed water”. This is typically a more cost effective and efficient water reuse technique and such water reuse should be recognized under this definition as well as the use of reclaimed water, by changing the definition to read: 40) “Water Reuse” is the internal reuse water within a facility or the use of reclaimed water as a substitute for another...” (Underlined text indicates the changed wording). This change also fits better with the later discussion in Section 7, (1) a.of the Water Plan on “water reuse” as a management practice and Section 8, (2) c.i., where water reuse as redefined above is clearly the intent.</p>	<p>Internal processes vary across industries and between facilities. Because internal water reuse processes can be so complex, the general change recommended here does not seem to be practicable and the definition of reuse was not changed.</p>
<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:26:28 PM SECTION 2: DEFINITIONS</i></p> <p>Definitions of terms and concepts Recommendations for the following definitions are provided: • consumptive use • consumptive use budget • human use • sustainable yield • sustainable • maintaining physical, chemical and biological integrity Solution: See Attachment I, Recommendation #2 and #5.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<p>The definitions listed here have been either been revised or language has been added to clarify the concepts and their intended use, in response to this and related comments.</p>
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:41:21 PM SECTION 2: DEFINITIONS</i></p> <p>42) “Water supply reservoir” is a lake or pond constructed and operated to store water primarily for the purposes of public water supply. This definition includes water from those resources not historically used as supply such as desalination and augmentation from the Tennessee River.</p>	<p>This comment relates to efforts to augment water supply, an issue to be addressed through regional planning with the foundation of water quantity resource assessments to inform investigation of water supply options. As such, the general</p>

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		definition of water supply reservoirs does not need to be changed.
Stephen Loftin Regional Business Coalition of Metro Atlanta	<p><i>10/31/2007 SECTION 2: DEFINITIONS</i></p> <p>On p. 5 the definition of "Water Conservation" should read "Water Conservation is the beneficial and cost-effective reduction of water use, water waste, and water loss".</p>	References to cost-effectiveness have been added to the discussion of specific water conservation practices (<i>Section 8: Demand Management Practices</i>).
Joe Cook Coosa River Basin Initiative	<p><i>10/31/2007 SECTION 2: DEFINITIONS</i></p> <p>Though the definitions of "raw water interbasin transfer" and "interbasin transfer" have already been clarified in this draft, I believe there is still a great deal of confusion about the difference between the two. This definition seems to suggest that a raw water transfer is one in which the water is transferred to a treatment facility in an adjoining river basin. Does this mean that if the treatment takes place in the basin of origin and is then pumped into an adjoining river basin that is considered an "interbasin transfer" and not a "raw water interbasin transfer." A fail to see the difference between the two definitions. In either case, water is being transferred. It seems to make little difference where the water is treated, be it in the donor basin or the receiving basin. The only difference I can see is the assumption that some of the water treated in the donor basin will be used in the donor basin and returned to the donor basin while the rest might be pumped to a receiving basin. This is currently the case with the Cobb-Marietta Water Authority's transfer from the Etowah to the Chattahoochee.</p>	The definitions seek to make a distinction between water transferred as a function of a water provider's service area vs. that transferred into a new service area. The last two sentences of the comment highlight this distinction.

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james scarbrough gwinnett water resources	<p><i>9/28/2007 9:48:03 AM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Section 3: Implementation Actions 1. ...;the character, amounts and timing of flow of pollutants to streams or other waters, (add consider the assimilative capacity of these waters);</p>	The suggested language is covered by the DNR rules listed in this paragraph.
wilbert	<p><i>10/9/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their oportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.
Thomas Vivelo	<p><i>10/17/2007 1:33:48 PM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Section 3 is very weak in enforcement of recommendations. It should be recommending state control of water access, and any building permits that require water access.</p>	This action is beyond current statutory authority and therefore beyond the scope of the water plan.
JC Corcoran Simply Enough	<p><i>10/19/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	Repeated comment: See above for response.

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<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Bryan Hager</p>	<p><i>10/30/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>An issue that seems to be missing from this plan is management of shallow ground water. The water contained in the soil and degraded rock above the bedrock is the source for most of the base stream flow in the Piedmont region of the state. The current rainfall deficit was exacerbated by the warm winter which prevented the shallow ground water from recharging. It has also been exacerbated by the increase in impervious surface and stormwater management policies in much of north Georgia. The amount of water stored in shallow groundwater is hundreds of times greater than the amount stored in manmade reservoirs. Protection and restoration of infiltration of rain water into the shallow groundwater will have significant benefits on water quality and quantity.</p>	<p>This comment highlights an issue to be considered in regional planning. Regional planning provides an opportunity consider the issues that are most significant in a region and to tailor the mix of options and selected practices to the specific needs and priorities of that region. The comment provides information that may be useful in development of guidance for regional planning, once the statewide plan is adopted.</p>

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<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:45:21 AM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>We raise again the question of the meaning of the phrase “values and opportunities provided by historic flow patterns.” The GWC supports the idea of looking at “historic” flow patterns as referenced, although we are unclear as to which historical period EPD is contemplating. For instance, the historic period of the last 50 years could still be inadequate to measure natural flow patterns on heavily impounded rivers such as the Chattahoochee. We would like to see more mandatory language in this section. It is unclear what the EPD Director will have to do in order to fulfill the requirement that he or she “consider” the effects of water withdrawal permits on waterways and their health. We also believe the regulations should say that the Director “shall” place appropriate and binding conditions in said permits to protect the sustainable functions of Georgia’s waters. Currently the regulations only say that the Director “may” place such conditions in permits, which combined with the term “consider” renders the proposed language without any real force.</p>	<ul style="list-style-type: none"> • The December 5th draft includes revisions intended to clarify the language regarding historic flow regimes. The specific time period(s) would be addressed as an implementation action, following adoption of the statewide plan. • The current draft includes provisions for DNR Board rulemaking as the implementation action for this section. Issues regarding the language (e.g., consider, may vs. shall) can be addressed in the rule making process.
<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:44:52 PM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Protection of consideration of public comments through DNR Board actions: Throughout the draft plan, the DNR Board is directed to amend its rules and regulations to provide specific items. We agree that the DNR Board is the appropriate venue for such actions. It is also important to preserve the judgement of the Board to evaluate public comments and develop regulations which appropriately implement the Water Plan and utilize public input, as provided by the Georgia Administrative Procedures Act. A plan approved by the General Assembly should provide authorization to the Board to adopt rules which implement the Plan. It is the Board’s function to evaluate public comments and determine how best to structure the rules. An example that has been referenced at Water Council meetings is the Flint River Drought Protection Plan. The language used in that plan was “ In the performance of its duties, the board shall have and may exercise the power to adopt, promulgate, modify, amend, and repeal rules</p>	<ul style="list-style-type: none"> • The current draft has been revised to call for DNR Board “consideration” of amendments to its rules and regulations. As the comment notes, Board rulemaking provides a forum for public discussion of proposed rules, and language in the current draft plan recognizes the Board’s authority and discretion on this area. • Language regarding state funding has been added to the December 5th draft (at the end of the section

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	<p>and regulations to implement and enforce the provisions of this article as the board may deem necessary. The rules and regulations may include, but shall not be limited to, the following”. We suggest utilizing this language for the Water Plan because it is consistent with the language already used by the General Assembly in the Flint River legislation. Solution: In all cases where DNR Board action is required, insert the following: “Upon adoption of this plan, the Board of Natural Resources shall have and may exercise the power to adopt or amend its rules and regulations which shall include but may not be limited to the following:”</p> <p>Funding: As stated in our August 17, 2007 comments, a key issue is the question of funding for implementation of the Water Plan. We understand that plans are to propose funding for implementation of the Plan through the normal agency budgeting process, as well as identify any other sources of funding. The anticipated funding request may be on the order of estimated costs of \$25,000,000 -\$30,000,000 over three years. We support appropriate funding for implementation of a sound Water Plan for the state of Georgia through the normal agency budget process. However, we recognize that because the budget approval and Water Plan approval processes are separate, there remains the possibility of an approved plan with unapproved or severely limited funding. If this occurs, it needs to be clear how that impacts the implementation of the Water Plan. It could be useful to identify levels of implementation of the plan based on funding. As a regulated industry, it is important that we understand any potential to recover funding for Water Plan implementation through permits if funds are not secured through the normal agency budget process. We believe the costs of implementation of a Water Plan to support the whole state should be equitably applied to consider all the uses and users of those water resources, giving appropriate consideration to many factors, such as consumptive use and point and non-point discharges. Solution: See Attachment I, Recommendation #3.(Note - formatting does not transfer to the website. See filed comments for markup of section) Scientific information to inform policies and practices: We applaud the recognition of the importance of information in the assessment of the status and</p>	<p>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> <ul style="list-style-type: none"> • In the December 5th draft, <i>Implementation of Regional Water Planning</i> has been revised to provide information on phasing of implementation with a timetable. • Cost effectiveness and benefit considerations of policy and implementations: While the specific revisions recommended here were not all used, the language was revised in several places in response to this and relate comments.
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	<p>condition of Georgia's water resources. The draft plan recognizes that the collection of scientific data and information is necessary to support implementation of the comprehensive statewide water management plan. The plan does not, however, specify timeframes or the order for implementation of specific policies or practices. We believe the development of the assessment plan must be completed first, which can then inform the priority of implementing specific policies and practices through rulemaking and public input, such as the existing process through the DNR Board. Solution: The water resource assessment plan should be the first action in implementing the water plan as described in Attachment I, Recommendation #3.(Note - formatting does not transfer to the website. See filed comments for markup of section) Cost effectiveness and benefit considerations of policy and implementations: Throughout the plan a number of considerations are outlined for various policy and implementation actions. Cost effectiveness and benefits analyses are not always included in these considerations. Cost effectiveness and analysis of the benefits of proposed actions are crucial to assure limited funding is being spent on those actions that will gain the most results for overall water management. Solution: See Attachment I, Recommendations #4, #10 and #11. (Note - formatting does not transfer to the website. See filed comments for markup of section) Additionally, a statement requiring such evaluation should be included for each policy and implementation practice.</p>	
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:42:04 PM SECTION 3: INTEGRATED WATER POLICY</i></p> <p>(4th paragraph) Georgia's current water resources have certain capacities that govern their use. The integrated policy recognizes that Barring sustainable supplementation, exceeding these capacities that govern the use of water resources is likely to have detrimental effects on current and/or future users and on the health and 5 well-being of Georgians and/or natural systems. The integrated water policy also recognizes, however, that these capacities can, under some circumstances, be supplemented in a sustainable manner, and or new sources developed, provided that is done following specific criteria to ensure that</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future demand. For those regions that do</p>

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	<p>opportunities for other uses and users are not unduly foreclosed. Criteria for specific management practices are included in the ruleplan. (5th paragraph) In concert with a comprehensive consideration of the myriad effects of water quantity decisions, the State of Georgia will manage consumptive uses of water from surface water and groundwater sources and support development of new augmented water supply to ensure that sufficient amounts remain to allow all users and uses – present and future – the opportunity to benefit from the values and opportunities provided by the resources. This comprehensive approach will require consideration of the collective impacts on flow regimes from the set of water withdrawals and water uses for each water source. Integrated Water Policy (1) Georgia’s economic well-being, the health and welfare of its citizens, and the diversity and health of its natural environment is dependent on the availability of clean water in the rivers, streams, lakes, wetlands, estuaries, coastal waters and groundwaters of the state. (2) Water resources in Georgia will be managed in a manner that recognizes the importance of clean water, provides for the protection and/or restoration of water quality, embraces the values and opportunities provided by historic flow patterns, and maintains use of current surface waters, groundwaters, and assimilative capacity and supports development of new water resources for current and future uses and users.</p>	<p>not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
<p>Stephen Loftin Regional Business Coalition of Metro Atlanta</p>	<p><i>10/31/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>In the Background section, in the 3rd paragraph the last sentence should be deleted. In the fourth paragraph, the second sentence should read “The integrated policy recognizes that consistently exceeding these capacities over time may have detrimental effects”. In the Integrated Water Policy section, item (2), delete the words “embraces the values and opportunities provided by historic flow patterns”. In its place insert the words “meets the needs of each region’s population and economic growth”. In the Implementation Actions subsection, in item (1) it should be made clear that EPD will not use water withdrawal permitting as a tool to control local land use decisions by local governments. EPD’s proper function is to give local governments guidance on how decisions will impact water quality and to enforce water quality standards and goals that are</p>	<ul style="list-style-type: none"> • References to “values and opportunities provided by historic flow patterns” have been revised in response to this and related comments. • Some of the text revisions suggested here would diverge from the general direction set by the Water Council and so, no action was taken on them/ <p>The last element of the comment is generally consistent with the intent</p>

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	agreed to through the regional planning efforts.	of the section. The current draft includes provisions regarding DNR Board consideration of rulemaking, and the specific issues raised here can be addressed in the rule making process.
Jo Hickson	<i>11/6/2007 4:29:57 PM SECTION 3: INTEGRATED WATER POLICY</i> Column two, paragraph beginning, "In concert... line 5 "users and uses.. ADD "(including plant and animal habitat uses)"	The referenced paragraph is explicitly inclusive of all users and uses, and is consistent with the inclusiveness of the relevant definitions. It is potentially misleading to highlight one set of uses; this change was not made.
james	<i>11/27/2007 SECTION 3: INTEGRATED WATER POLICY</i> Through basic green building techniques such as a gray water system and and rain water catchment. Why is it not ok for me to flush my waste of today with water from yesterdays shower. Why must We flush drinking water? Standards on new construction requiring low flow systems be installed with water catchment. If my calculations are correct, a 300 square foot area can trap 187 gallons of water if it rains 1 inch. That's a lot of flushes!	The December 5 th draft has been revised to include provisions regarding consideration of grey water use as an element in water conservation in the municipal and industrial sectors.
james scarbrough gwinnett water resources	<i>9/28/2007 9:50:54 AM SECTION 4: WATER QUANTITY POLICY</i> 2. We are concerned that the Division will not have the resources to determine the sustainable yield for each water source and therefore cannot supply the data to the planning councils. How can a coucil (basin) proceed without this data? There needs to be an alternate method or proceeding with the local plan in the absence of sufficient resources for EPD to do its work.	Language regarding state funding has been added to the December 5 th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). If full funding is not achieved, decisions will have to be made about how to prioritize the

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		implementation actions.
wilbert	<p><i>10/9/2007 SECTION 3: INTEGRATED WATER POLICY</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their opportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	Repeated comment: See above for response.
Gena B. Agnew NW GA Regional Cancer Coalition	<p><i>10/17/2007 10:16:01 AM SECTION 4: WATER QUANTITY POLICY</i></p> <p>The Quality of Life and Economic Development in Floyd County has historically been directly connected to our three rivers and supply of water. When first developed, Rome's commerce centered around the transport of goods into and out of Rome via the rivers. As Rome has grown, new industries choose to locate here, and existing industries choose to expand here for the primary reason that there is an abundant water supply. With the advent of the Coosa River Basin Initiative, many in our community and the surrounding communities have turned their attention to the rivers as a source of recreation - fishing, canoeing, kayaking, boating. With this attention has arisen the awareness of how valuable our rivers and water supply is to us - many efforts are being made to clean the river by individuals, groups and even industry. We are very aware of how important water is to our community, and we take care of them. On the other hand, the metro Atlanta area, with little water of its own, continues with uncontrolled growth, urban sprawl, a failing infrastructure which seems is only repaired if a road caves in and someone is inconvenienced, and no firm inforceable control over or apparent interest in water conservation. Georgia is much more than Atlanta. To</p>	The Water Council considered revisions to the 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.

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	<p>drain water from the rest of the state to serve Atlanta is unacceptable without a plan to treat and return that water to its source. If the metro Atlanta area wants to "borrow" water, there must be a return of that water. Lake Allatoona, Lake Lanier, and the Etowa river have many homes, vacation and camping areas, recreation areas which have property values plummeting as Atlanta drains them dry. This has especially become evident during our continuing drought - what is Atlanta doing to conserve water? There is a limit to our water resources as is becoming more and more evident. I would ask that enforceable limits be set on the amount and ability of the metro Atlanta area take water without treating and returning it to its source.</p>	
<p>Thomas Vivelo</p>	<p><i>10/17/2007 1:21:54 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>Section 4 has no recommendations for finding and developing new water sources for the state, or any growth restrictions based on quantity of water that is available. Why?</p>	<p>In response to this and related comments, <i>Section 10: Water Supply Management Practices</i> has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>

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<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 3:31:33 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>This plan must encourage water management goals to address needed expansion of existing reservoirs, locations for and construction of new reservoirs and storages (both on and off-stream) and much needed efficiency in planning, permitting and construction of such water storages.</p>	<p>The sub-section on surface water storage has been substantially revised in the most recent draft. Among other elements, revisions clarify the focus on water supply reservoirs and clarify the water conservation provisions listed under full consideration of water supply alternatives. A state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans is more clearly defined. Finally, the provision regarding “full-yield” of reservoirs was revised to indicate a preference rather than state a</p>

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		prohibition.
Sara Barczak Southern Alliance for Clean Energy	<i>10/29/2007 5:30:14 PM SECTION 4: WATER QUANTITY POLICY</i> Beginning on page 56 under the Water Quantity Policy section, we agree with the emphasis placed on water consumption over general water use (water withdrawals). However, as stated earlier, 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 of Georgia's power plants.	The comment raises several issues that can be addressed the resource assessments for specific water resources and in preparation of regional water development and conservation plans. The comment provides information that may be useful in development of resource assessments and guidance for regional planning, once the statewide plan is adopted.
Julie Mayfield Georgia Water Coalition	<i>10/30/2007 11:45:51 AM SECTION 4: WATER QUANTITY POLICY</i> The GWC supports the majority of the proposed water quantity policy. Evaluating the cumulative impacts of present and forecasted future surface and groundwater withdrawals is an essential task for this state to undertake. We ask that the Water Council advocate for sufficient funding and resources for this task to be carried out expeditiously and thoroughly. We strongly believe that water withdrawal permits in Georgia should be subject to the same notice and comment procedures that govern discharge permits. We do not support giving the EPD Director carte blanche authority to allow increased withdrawals from aquifers whose yield is unknown. This provision should be qualified to apply only in exceptional situations, such as demonstrated and declared emergencies, and it should contain a sunset clause to take effect after a reasonable period of time.	<ul style="list-style-type: none"> • The December 5th draft has been revised to provide additional guidance for withdrawals from reservoirs whose yield is unknown. • Notice and comment procedures for water withdrawal permit would require statutory change and so, is beyond the scope of the state water plan.
Virginia Holton Packaging Corporation of America	<i>10/30/2007 12:12:44 PM SECTION 4: WATER QUANTITY POLICY</i> Section 4: Water Quantity Policy The background section should be expanded to include the concept of economic and permitting incentives for activities that enhance or conserve water resources, and not limit the discussion to water	<ul style="list-style-type: none"> • Language has been revised in several sections of the plan to recognize statutory provisions

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	<p>conservation alone. These should include incentives for activities that enhance water resource protection and replenishment, including such things as maintenance of land in forestry, conservation easements, early reduction credits for business and industry who implement water conservation ahead of time, permitting incentives for enhanced water conservation design in construction and development, and conservation-based rate structures, etc, as discussed in the Conceptual Comments, Item No.7, above. Discussion language to this effect is needed in the Plan, and would fit well following the end of the second paragraph in Section 4 Background and in the Section 4 Policy statements: “4. Efforts to enhance water resource protection and replenishment, improving quality and quantity of the water resources, shall be encouraged , including appropriate incentives for activities such as maintaining large tracts of land in forestry or other green space, to allow greater groundwater recharge and retain, filter and slow rain water flow to surface waters.” Implementation actions consistent with this policy should be added as well. This concept as well as similar language could also be included in the Integrated Water Policy Discussion in Section 3 and Section 5 on Water Quality. Another improvement in the Implementation Plan in Section 4 would be to add language such as the following, as a new bullet point: “4. Existing conservation efforts as well as early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing the water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.” This language is needed also in Section 8, in addition to Section 4.</p>	<p>regarding consideration of economic and technical factors in permitting.</p> <ul style="list-style-type: none"> • In response to this and related comments, the December 5th draft has been revised to reference the state’s program for protection of water supply watersheds and aquifer recharge areas. • The comment also raises actions that can be considered during regional planning following adoption of the statewide plan. Regional planning will provide an opportunity to tailor the mix of practices to the specific needs and priorities of each region. • In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to clarify recognition of conservation efforts that have already been implemented and/or water use efficiencies that have been accomplished. Revisions are also intended to clarify other ways in which flexibility is provided to water permit holders and applicants.
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<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:35:45 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>Consumptive Use Budgets The current plan defines consumptive use budget as “the water reliably available for consumption over a specified period of time from a water source in a dry year, beyond the quantities needed to meet in-aquifer needs or downstream flow regime requirements. Consumptive use budget amounts may be increased through either selected modifications of the source or supplementing the source”. The plan seems to allow only the water reliably available for consumption during a dry year, precluding the additional water available during normal times from being available for consumptive uses. Solution: See Attachment I, Recommendations #2 and #6. (Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<p>The December 5th draft has been revised in response to this and related comments. Revisions clarify the meaning of “dry year” and explicitly provide for use of additional water during normal and wet years, including that as a consideration to be addressed in regional planning.</p>
<p>Ian Lundberg Resolve Environmental Engineering, Inc.</p>	<p><i>10/31/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>Due to the importance of sustainable yield determinations in the permitting process and the lack of detail about these determinations in the Water Plan, Georgia EPD should be required to have stakeholder review and comment for any proposed sustainable yield determination procedures or guidance and for individual sustainable yield determinations prior to finalization.</p>	<p>Language has been added to specify assistance of a technical advisory group in development of the consumptive use assessments and to provide for public review and comment on consumptive use assessments and supporting factors such as sustainable yield.</p>
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:43:21 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>Background The water quantity policy is to manage the consumptive use of water and support development of new water resources on a watershed basis so that sufficient amounts remain within the current the a water source to allow all users and uses – present and future – the opportunity to benefit from the values and opportunities provided by the resources. Water use is consumptive when water is removed from the water source Water Quantity Policy (1) Current Water resources in Georgia will be managed in a manner that recognizes the values and opportunities provided by historic flow patterns. The flow pattern in Georgia’s rivers and streams varies widely across the state, and the opportunities for</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future demand. For those regions that do not have sufficient water supply,</p>

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	<p>offstream and instream uses of water that are supported by these flow patterns likewise varies across the state. Historic flow patterns in different rivers and streams, and the opportunities for offstream and instream water use that they afford, are of prime importance in making water management decisions. (2) In concert with the integrated water policy, the State of Georgia will manage consumptive uses of surface water and ground water, alterations of flows through storage, and other actions that affect flow regimes, to ensure that sufficient amounts remain to allow all users and uses – present and future – the opportunity to benefit from the values and opportunities provided by the resources. (3) The state of Georgia will cause a comprehensive study of augmentation of water supply from resources that have not historically been utilized. This study will determine the impact of augmenting supply through desalination and withdrawal from the Tennessee River. The study will not only look at the initial cost and benefits, but will attempt to estimate the impact to the future of the state’s economy and quality of life for its citizens of both developing these new resources and the impact of not developing these new resources.</p>	<p>resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
<p>Steve Williams</p>	<p><i>10/30/2007 11:47:56 PM SECTION 4: WATER QUANTITY POLICY</i></p> <p>Have major water users keep records on use and management and keep them open to the public. Have no one exempt</p>	<p>A program to collect information on water use by major users/customers is included <i>Section 8: Demand Management Practices</i> as a practice that municipal and private water providers may chose to implement.</p>
<p>Stephen Loftin Regional Business Coalition of Metro Atlanta</p>	<p><i>10/31/2007 SECTION 4: WATER QUANTITY POLICY</i></p> <p>In the Background section, in the first paragraph, second sentence, delete the word “contemporary”. “Contemporary users” is not defined and has no commonly understood meaning. In the third paragraph of the Background section, the concept of sustainable yield should not be limited to dry year conditions; provision should be made for use of the additional water that is available in other years. In the Water Quantity Policy section, delete item (1) and</p>	<ul style="list-style-type: none"> • The December 5th draft has been revised to clarify the meaning of “dry year” and to explicitly provide for use of additional water during normal and wet years, including that as a consideration to be addressed in regional planning.

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	<p>insert "Water resources in Georgia will be managed in a manner that provides for the projected water supply needs of each region of the State in a timely manner". In Implementation Actions, add an item 4 to read "In regions that demonstrate the possibility that they will reach the limit of their water supply resources in the future through a water resource assessment as outlined in Section 6 of the plan, the division will, in addition to assisting in determining conservation goals and implementation items as outlined in Section 8 of the plan, actively encourage measures to augment water supply capabilities through water storage reservoirs and other supplementation measures and will develop methods to expedite permitting of these facilities".</p>	<ul style="list-style-type: none"> • <i>Section 10: Water Supply Management Practices</i> has been substantially revised in the most recent draft. These revisions address the changes suggested by this comment. Among other elements, revisions clarify the focus on water supply reservoirs. A state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans is more clearly defined. Finally, the provision regarding "full-yield" of reservoirs was revised to indicate a preference rather than state a prohibition.
<p>james scarbrough gwinnett water resources</p>	<p><i>9/28/2007 9:53:42 AM SECTION 5: WATER QUALITY POLICY</i></p> <p>Background. Second sentence is incomplete. Suggest rewording as follows: "Far more contamination is washed into waters of the state by urban and agricultural runoff during and after storm events now than is delivered to the waters of the state by point sources."</p> <p>The new water quality standards for bacteria and dissolved oxygen are urgently needed now and should be given top priority by the agency for promulgation.</p>	<ul style="list-style-type: none"> • This change was made in the December 5th draft. • Depending on the DNR Board's schedule, the rules called for in the draft plan, including revisions in water quality standards, may be completed in 36 months.

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<p>Steven Marion</p>	<p><i>10/7/2007 10:30:47 AM SECTION 5: WATER QUALITY POLICY</i></p> <p>HELLO? I Find it very hard to believe that in this 92 page “REVISED DRAFT COMPREHENSIVE STATEWIDE WATER MANAGEMENT PLAN” That you have absolutely “NO” mention of “protection” of the very WATER you are trying to plan for. Have any of you ever heard of Safe Drinking water? Adaptation of Backflow Prevention programs? Cross connection protection of the Drinking water system? You can find all the water in the world. But to make it safe and protect it from intentional or unintentional contamination is most important and cannot be left out... Have any of you even thought of asking a Plumber how to keep it safe??? Start with the “University of Florida TREEO center” and then maybe contact the “American Backflow Prevention Association” this could help you “KEEP THE WATER WE HAVE SAFE”</p>	<p>Repeated comment: See above for response.</p>
<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 SECTION 5: WATER QUALITY POLICY</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 5: WATER QUALITY POLICY</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming</p>	<p>Repeated comment: See above for response.</p>

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	<p>from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:30:39 PM 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. We specifically call the Council's attention to the dire circumstances of Georgia's environmental radiation monitoring program. Several years ago, Georgia lost crucial funding provided by the Department of Energy to conduct extensive monitoring in the Savannah River corridor, which is impacted by pollution from the Savannah River Site (SRS), a nuclear weapons facility. SRS has since ramped up operations and is planning to expand. The Council should be aware that years ago a spill of tritium, a radioactive form of hydrogen that can cross the placenta and affect the developing fetus, from SRS affected the City of Savannah's water supply for several days, even longer for some industries. Tritium is also produced at all operating nuclear power plants. Additionally, over the years monitoring downstream of nuclear power plants and facilities in and near Georgia has become even more rudimentary due to state funding cuts. This has to improve. The Department of Energy should be pressured to restore this funding and the Georgia legislature must increased state funding as well. Georgians have less protections today than they did just a few years ago while the polluting industries are expanding.</p>	<p>Development of a comprehensive plan for resource assessment, including on-going monitoring and budget, will be a critical early step in implementation, once the statewide plan is adopted. Provisions regarding this are included in the current draft in <i>Section 6: Water Resource Assessment</i>.</p>

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<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:46:22 AM SECTION 5: WATER QUALITY POLICY</i></p> <p>The GWC supports this section, which contains important statements about the need to restore water quality in many of our water bodies and to manage those waters more sustainably. To reiterate our point from the previous section, this management will require significant financial and personnel resources to be effective, and we expect the Water Council to advocate for this funding and for more and better monitoring of our waterways. Under paragraph (1) of the implementing actions, instead of stating that the Board of Natural Resources will “establish” water quality standards, we suggest the plan should clearly reflect that “the Division” or “the Director” will develop and recommend these standards to the Board for adoption.</p>	<ul style="list-style-type: none"> • Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). • Paragraph (1) of the implementation actions should be consistent with current statute and revisions in response to this comment will be considered following this round of public comment.
<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:13:27 PM SECTION 5: WATER QUALITY POLICY</i></p> <p>Section 5: Water Quality Management The background section in this Section should also be expanded to include the concept of economic and permitting incentives for activities that enhance or preserve water quality as discussed above in both the Conceptual comments and Section 4 comments. These should include incentives for activities that enhance water resource protection and replenishment, including such things as maintenance of land in forestry, conservation easements. Discussion language to this effect is needed in the Plan, and would fit well following the end of the third paragraph in Section 5 Policy Statement: “2. Efforts to enhance water resource protection and replenishment, improving quality and quantity of the water resources, shall be encouraged , including appropriate incentives for activities such as maintaining land in forestry or other green space, to allow greater groundwater recharge and retain, filter and slow rain water flow to surface waters.”</p>	<ul style="list-style-type: none"> • Language has been revised in several sections of the plan to recognize statutory provisions regarding consideration of economic and technical factors in permitting. • In response to this and related comments, the December 5th draft has been revised to reference the state’s program for protection of water supply watersheds and aquifer recharge areas. • The comment also raises actions that can be considered during regional planning following adoption of the statewide plan. Regional planning will provide an

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		opportunity to tailor the mix of practices to the specific needs and priorities of each region.
james scarbrough gwinnett water resources	<i>9/28/2007 10:06:39 AM SECTION 6: WATER RESOURCE ASSESSMENT</i> Implementation Actions (2) Water Quantity Resource Assessments. It seems that these details would be more appropriately contained in a rule promulgated by the DNR Board than in the Plan. The policy is that the assessments will be done. The how to do them should be in a rule. (3) Same comment as above. Put the details in a DNR Board rule.	The Water Council has chosen a different approach, providing additional detail so the intent and potential implications are clearer than would be provided in a more narrowly structured policy document. The current draft, however, proposes the specifics for consideration by the DNR Board.
Will Riley Georgia Institute of Technology	<i>10/4/2007 12:46:46 AM SECTION 6: WATER RESOURCE ASSESSMENT</i> Providing the public with easy access to the most recent and comprehensive data on water resources should be a priority in this plan. Unfortunately, the plan currently provides no details on the database. It neither specifies what it means by "accessible" nor "comprehensive". Please incorporate the database design into the plan. The database should be web-accessible and provide a web-based API to query it. Query results should be formatted as XML files. The database should include real-time sensor data if possible. The data should be geocoded if possible. It should include detailed geographic information on water consumption. The focus should be on data acquisition, validation, and access. If the data is comprehensive, accurate and available via the Internet, third parties will be able to build graphical user interfaces around the data. To evaluate our water resources, the public needs a comprehensive and accessible database. They also need ways to contribute to the database and modify its design.	This comment provides information that will be useful in development of comprehensive resource assessment and monitoring plan, as discussed in Section 6, once the statewide plan is adopted.

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<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Kellie Bowen</p>	<p><i>10/21/2007 SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>The drought is sadly the last straw that broke the camels back. Unbridled growth in the entire state, especially Atlanta, was not matched by adequate water supply. Water authorities and managers cannot allow explosive growth and alarming numbers of water meters to be hooked up to the system without having the supply to handle the demand. Drought conditions should be planned for and that lack of planning is nothing more than rolling the dice and hoping there won't be a drought or any other situation for that matter that will cause a crisis such as the one we are facing right now. Lake Lanier is not growing and even if there was</p>	<p>The comprehensive statewide water plan is intended to guide long-term planning for Georgia's water resources and is not intended to guide responses to extreme conditions, like drought or the emergency circumstances that may result. The comprehensive</p>

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	<p>adequate rainfall the lake cannot keep up with the growing demand. There has been a collective failure at all levels of government agencies that allowed the entire state to end up in this crisis. Our livelihoods are at stake, our economy is at stake, and our environment is at stake all because of poor planning and the lack of foresight to plan for a drought. Effective water conservation is not achieved by ordering a total water ban that puts Georgians in the Urban Agriculture Industry out of business while failing to address other industries and businesses that consume huge quantities of water. Urban Agriculture is responsible for \$8 billion in sales yearly and a total water ban is nothing more than a band aid that is unable to heal the wound called "a water crisis". My message that everyone must not ever forget is that poor planning and unbridled growth is the root of the crisis. The drought is merely a symptom of the total failure of the state to be prepared for any situation that could threaten all Georgians.</p>	<p>statewide water plan will be implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide responses to drought or other emergency circumstances.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:47:04 AM SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>We believe that the “additional resources” alluded to in paragraph (3) of the policy should be quantified to lay out the current state of funding for monitoring efforts and the additional amounts needed to improve the program statewide. We support the components of the assessment plan, but this provision also needs a timeline to be followed in order to ensure the assessments are done in a timely manner that relates to the rest of the plan. With regard to water quantity assessments, we ask that “groundwater levels” referenced in (2)(a) be more specific, so that the term refers to the naturally occurring water levels in Georgia’s aquifers. In (2)(f), the term “discharge characteristics of waters from interbasin transfers” is vague and seems out of place without further clarification. Discharge characteristics, except for the volume, do not seem directly relevant to water quantity assessments as envisioned in paragraph (2); we would suggest that this term be further defined and also added to the section on water quality resource assessments, since the term implicates both water quantity and quality. Paragraph (2)(g) is particularly problematic. This paragraph could be interpreted to mean that the results of water quantity assessments will have no bearing upon instream flow requirements that appear in water withdrawal permits. If this is the</p>	<ul style="list-style-type: none"> • In the December 5th draft, <i>Implementation of Regional Water Planning</i> has been revised to provide information on funding and on phasing of implementation with a timetable. • Development of a comprehensive plan for resource assessment, including on-going monitoring and budget, will be a critical early step in implementation. • Paragraph (2)(f) has been revised in response to this comment. • The Board of Natural Resources' instream flow policy is germane to individual withdrawal permits and operational characteristics of non-federal reservoirs. The policy is

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	<p>case, then the entire water quantity assessment seems an empty gesture. The instream flow policy in Georgia is outdated and was not meant to account for important instream conditions for aquatic habitat, recreation, flood protection, etc. We have long advocated that the Board of Natural Resources enact a permanent instream flow policy that better represents these important values, and the water plan would be a logical place to broach that issue. The instream flow language needs to be strengthened, and a final instream flow policy needs to be incorporated into binding regulations. Paragraph (3) addresses water quality assessments. Section (3)(d) gives the EPD the power to define the hydrologic boundaries of watersheds for the determination of permit conditions. The EPD has changed the language here, perhaps in an attempt to clarify it, but we remain unclear as to the intent of this section. If the EPD does not intend to somehow take into account non-hydrological considerations in making this determination, perhaps the word “identify” could be substituted for “define.” Absent some clarification on this point, we recommend that this sentence be deleted. In paragraph (3)(f), we ask that the language be clarified to make clear that the impacts of nonpoint discharges will also be considered in establishing permit conditions for point source discharges.</p>	<p>currently described as interim, and the Board has recognized the need to conduct scientific investigations here in Georgia that will be used as the foundation for a final instream flow policy. Those scientific investigations have not been conducted. It is appropriate to encourage the Board to include these investigations in future work programs of its Divisions. Implementation of the statewide water plan may contribute to the information base required for revision of the instream flow policy, and such scientific investigations could be written into work that is to be completed in the regional water planning process.</p> <ul style="list-style-type: none"> • In the provisions regarding water quality resource assessments, the Director will have to define the <u>scale</u> of the watershed to be used. This determination will be based on hydrologic considerations; it is simply a scaling question. • The comment also raises factors that may be considered during implementation following adoption of the state water plan, including preparation for regional
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		planning.
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:44:00 PM SECTION 6: WATER RESOURCE ASSESSMENT</i></p> <p>(2nd paragraph) If Georgia is to develop water resource plans that will allow continued sustainable use and enjoyment of our water resources, the state must first define the capabilities of these water resources including new resources not historically utilized.. These resource capabilities must be defined in terms of the ability of each water resource to support additional water withdrawals and to safely assimilate larger masses of pollutants without foreclosing opportunities for other users and uses of the resource. (3rd paragraph) Assessment of resource capacity will require compilation of a substantial information base, a comprehensive monitoring program, engineering research and estimates, and a well-coordinated system Water Resource Assessment Policy (3) Georgia must invest additional resources to coordinate current monitoring efforts and expand monitoring as well as the cost associated with developing new water resources and properly monitoring their utilization as needed for a statewide assessment of the condition and capacities of Georgia's water resources. This information will support regional planning and comprehensive water management.</p> <p>Implementation Actions (2) Water Quality Resource Assessments a. In accordance with O.C.G.A. §12-5-522 (b) and paragraph (2) above, the Director shall will implement a monitoring program to implement surface water flows and groundwater levels in addition to flows from any additional new resources developed. Water resources management efforts must have a sound scientific foundation. Assessment of the quantity of water available to support current and future in stream and off stream uses human needsuse, as well as the needs of natural systems, and other instream uses requires enhanced information on</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future demand. For those regions that do not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>

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	surface water flows and groundwater levels and any flows from additional new resources developed.	
Stephen Loftin Regional Business Coalition of Metro Atlanta	<i>10/31/2007 SECTION 6: WATER RESOURCE ASSESSMENT</i> In Implementation Actions, item 2(d) delete the last sentence. How far back will EPD go in determining “the entire history of flows?” 100 years? 500 years? 100,000 years? In item 2(e) delete “contemporary”.	The assessments described in item 2(d) will be conducted following standard hydrologic practices, and the December 5 th draft has been revised to specify assistance from a technical advisory panel in developing the methodology for the consumptive use assessments.
wilbert	<i>10/9/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i> Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their opportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.	Repeated comment: See above for response.
Brenda Rashleigh	<i>10/12/2007 4:03:13 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i> The plan should not propose to use state funds and personnel to study speculative water management schemes, such as aquifer storage and recovery, nutrient trading and desalination. The draft plan does not set a specific instream flow policy or provide a process to develop one. This means we do not know how EPD will determine how much water has to stay in streams and rivers when it is making decisions about water availability to support population growth. The plan should indicate how EPD will ensure there will always be enough water in the	<ul style="list-style-type: none"> • ASR, desalination, and pollutant allocation trading, are among the practices described in the draft plan that may help meet Georgia’s long-term water needs, but would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited

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	<p>state's rivers, lakes, streams and estuaries to protect fish and wildlife and conserve aquatic biodiversity and other ecosystem values to all users upstream and downstream.</p>	<p>by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could achieve regulatory approval and active use within the context of a regional water plan. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory approval process, not by excluding such potential practices from the plan itself.</p> <ul style="list-style-type: none"> • The Board of Natural Resources' instream flow policy is germane to individual withdrawal and reservoir locations, and is founded on recognition of the need to conduct scientific investigations here in Georgia that will be used as the foundation for a final instream flow policy. Those scientific investigations have not been conducted. It is appropriate to encourage the Board to include these investigations in future work programs of its Divisions. Implementation of the statewide water plan may contribute to the information base required for
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		revision of the instream flow policy, and such scientific investigations could be written into work that is to be completed in the regional water planning process.
Rae Sikora	<p><i>10/19/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	Repeated comment: See above for response.
Genevieve L. Frazier voter and resident of Georgia	<p><i>10/19/2007 12:52:54 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Georgia's water integrated policy permits Atlanta to take water from North Georgia and dump it without putting it back into North Georgia Rivers. If Atlanta takes from the Etowah there SHOULD FIRST be adequate levels for us AND then Atlanta should return it to the Etowah. ATLANTA HAS NEVER CONCERNED APPROPRIATELY.</p>	The Water Council considered revisions to the 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.

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<p>Kellie Bowen</p>	<p><i>10/21/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>The drought is sadly the last straw that broke the camels back. Unbridled growth in the entire state, especially Atlanta, was not matched by adequate water supply. Water authorities and managers cannot allow explosive growth and alarming numbers of water meters to be hooked up to the system without having the supply to handle the demand. Drought conditions should be planned for and that lack of planning is nothing more than rolling the dice and hoping there won't be a drought or any other situation for that matter that will cause a crisis such as the one we are facing right now. Lake Lanier is not growing and even if there was adequate rainfall the lake cannot keep up with the growing demand. There has been a collective failure at all levels of government agencies that allowed the entire state to end up in this crisis. Our livelihoods are at stake, our economy is at stake, and our environment is at stake all because of poor planning and the lack of foresight to plan for a drought. Effective water conservation is not achieved by ordering a total water ban that puts Georgians in the Urban Agriculture Industry out of business while failing to address other industries and businesses that consume huge quantities of water. Urban Agriculture is responsible for \$8 billion in sales yearly and a total water ban is nothing more than a band aid that is unable to heal the wound called "a water crisis". My message that everyone must not ever forget is that poor planning and unbridled growth is the root of the crisis. The drought is merely a symptom of the total failure of the state to be prepared for any situation that could threaten all Georgians.</p>	<p>Repeated comment: See above for response.</p>
<p>Pat Johnston</p>	<p><i>10/25/2007 7:54:52 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Even though well water use was a loophole in the water ban, I'm hopeful that the Comprehensive Statewide Water Management Plan for Georgia will not allow our groundwater resources to go unmonitored and unregulated. It's essential for everyone to have access to groundwater data for the water below us. The data found at the USGS Groundwater Monitoring Network Internet site is excellent. Unfortunately, only 170 wells in Georgia are monitored, most in S. Georgia,</p>	<p>The December 5th draft has been revised in response to this and related comments. Language has been added to the paragraph referenced here to provide interim management steps for aquifers</p>

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	<p>nothing close to Paulding County. If you don't know how much water is in your local aquifer over time, how can you tell if recent or future deep aquifer extraction is detrimental to that aquifer? On page 47 of the draft, section 760-2-2-.06 I was heartened to read about establishing a framework for scientifically assessing the status and condition of Georgia's water resources, specifically "It allows for an assessment of aquifer storage and recovery, and acknowledges the potential importance of desalination." This is GOOD, but reading on at page 72 my hopes were dashed, "For some aquifers, however, future increases in withdrawals that can be reasonably expected are highly unlikely to have unacceptable adverse impacts on the aquifer, and it will not be possible to evaluate sustainable yield within reasonable time and cost constraints." This is BAD. So, who gets monitored and who doesn't? It is so important that Georgia survey ALL of our aquifers. It's not just the interconnectedness of groundwater; it's what's fair for all Georgians. Everyone in Georgia needs the most detailed and complete aquifer monitoring of our entire state.</p>	<p>until resource assessments can be completed.</p>
<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 3:25:15 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Goals of water conservation must include the participation of all water users where practicable and not encourage conservation of practices considered to be consumptive uses more so than those that are considered non-consumptive. Targeting supposed "consumptive uses" during this current drought has caused devastating impacts to horticulture and landscape professionals by local governments targeting outdoor water use as its sole water conservation effort. Such initiatives are creating economic hardships for the industries that rely on necessary outdoor water uses.</p>	<p>The issues raised in this comment concern the current drought response. The comprehensive statewide water plan is intended to guide long-term planning for Georgia's water resources and is not intended to guide responses to extreme conditions, like drought or the emergency circumstances that may result. The comprehensive statewide water plan will be implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide</p>

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		responses to drought or other emergency circumstances.
Sara Barczak Southern Alliance for Clean Energy	<p><i>10/29/2007 5:31:38 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Sections 7-10, General We agree with the premise of water conservation as the priority water quantity management practice that must be incorporated by all water use sectors. However, 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. With more efficient lighting, more efficient heating, and more efficient air conditioning, among other measures, we can reduce the overall burden on our electric system, including its water consumption. Also, some simple energy saving technologies such as energy efficient washing machines have the added benefit of reducing water consumption. 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</p>	Revisions to the December 5 th draft include links to the State Energy Strategy in the guiding policy statements and in the provisions for regional planning.

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	<p>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 bioenergy. To illustrate, we could analyze the current proposal to build two more nuclear reactors at Plant Vogtle. The existing two reactors use approximately 64 million gallons of water per day and consume over 43 million gallons per day. The proposed new nuclear reactors along the Savannah River are estimated to use 53 million gallons of water per day with 50-75% of that lost as steam (Southern Nuclear Operating Company, Early Site Permit Application, Environmental Report, August 2006). To put that in perspective, with average per capita daily water use in Georgia at 75 gallons from surface and ground water, more water will be lost from the two existing and two proposed reactors at Plant Vogtle than is currently used by all residents of Atlanta, Augusta, and Savannah combined (using 2005 Census figures). 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 strongly agree 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. 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 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</p>	
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	<p>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.)</p>	
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:47:31 AM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>This section gives a general overview of the different types of water quantity management practices that will be employed by EPD. We believe that the first sentence in policy section (2) should be changed to read that these practices shall be implemented (not “may” be implemented). Both aquifer storage and recovery (ASR) and desalination are listed as potential water supply management practices in (2)(c). We believe that both should be deleted from this paragraph and should not appear in this plan. Both practices are localized in scope, and their legality is questionable under current Georgia law. Both practices have yet to be proven as effective water management tools anywhere in the United States, and we do not believe that Georgia should rely on experimental or theoretical practices to justify unsustainable growth. Neither practice belongs in a comprehensive statewide water management plan that purports to establish statewide policy. Finally, paragraph (3) discusses water conservation. The GWC wholeheartedly believes that conservation should be “the” priority water quantity management practice in Georgia, not just “a” priority practice. We therefore ask that this language be changed back to the original language characterizing conservation as “the” priority water quantity management practice. Furthermore, conservation must be practiced by all water users, not just all water use sectors.</p>	<ul style="list-style-type: none"> • The word “may” is used to reflect the flexibility in regional water planning to tailor the mix of practices to the specific needs and priorities of each region. • ASR and desalination are among the management practices described in the draft plan that would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could achieve regulatory approval and active use within the context of a regional water plan. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory

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		<p>approval process, not by excluding such potential practices from the plan itself.</p> <ul style="list-style-type: none"> • Language regarding water conservation has generally been revised to reflect the flexibility provided to water permit holders and applicants. The language referenced in the comment is consistent with that approach and has not been changed.
<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:14:20 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Section 7: Water Quantity Management Water reuse as listed in Section 7, (2) a. should refer to an expanded definition of water reuse to include internal reuse practices within a facility, where the end result is the same reduction in water use, but the reuse does not require treatment to the standards defined for reclaimed water. This can be most easily accomplished with a change as follows in the definition in Section 2, “(40) “Water Reuse” is the internal reuse water within a facility or the use of reclaimed water as a substitute for another...” If that is done, no changes are needed to this discussion in Section 7. This definition change is also in keeping with the water use reduction implementation measures listed in Section 8 (2) c.i. The management practices listed in Section 7 (2) b. should be more explicit regarding centralized wastewater treatment systems including, at least as a goal, advanced wastewater treatment of all municipal wastewater, to meet reclaim water standards, or potable water standards, so that it can be returned to reservoirs and/or can be used for dual plumbing systems for reclaim water reuse purposes, as a means to reduce the draw down on the reservoirs and demand on other water supplies. Putting the treated water back into the reservoirs is no different than discharging to rivers upstream of other cities who use the river as their drinking water supply, and the requirement for advanced wastewater</p>	<ul style="list-style-type: none"> • Internal processes vary across industries and between facilities. Because internal water reuse processes can be so complex, the general change recommended here does not seem to be practicable and the definition has not been expanded. • The comment also raises actions that can be considered during regional planning following adoption of the statewide plan. Regional planning will provide an opportunity to tailor the mix of practices to the specific needs and priorities of each region.

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	<p>treatment would assure more, higher quality water resources for both during low water flow periods. Such treatment would also serve to mitigate the environmental impact of discharged water volumes at higher percentages of the receiving stream volume during low flow conditions. AWT is a proven technology in use in many areas throughout the nation that have on-going water supply issues such as Georgia faces.</p>	
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:44:38 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Policy: Water Quantity Management Practices (1) The purpose of water quantity management practices is to manage the consumptive use of water from a given source in a sustainable manner by managing demand and returns or, when it can be done without unreasonably foreclosing opportunities for other users and uses, to supplement the sustainable yield of a water source. (2) A variety of water quantity management practices may be implemented to manage and use water resources in conformity with Georgia's integrated water policy (section 760-1-1-.03). These practices include but are not limited to: a. Water demand management practices, including water conservation and water reuse; b. Water return management practices, including optimal management of centralized wastewater treatment facilities and management of the number and location of septic systems, on-site sewage management systems and land application systems; and c. Water supply management practices, including the construction of water supply reservoirs and adoption of reservoir management policies that optimize water supply storage and maintain necessary flow regimes, pursuant to these rules following specified criteria; interbasin transfers, so long as the transfers protect that meet specified criteria in this rule; and aquifer storage and recovery. A comprehensive study of the development of water resources not historically used for water supply must be included in water management practices. This study must include both desalination and augmentation from the Tennessee River and should provide analysis of the benefits of both the cost associated with developing and managing these new resources and the cost to the state's economy</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future demand. For those regions that do not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>

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	<p>and the quality of life of its citizens of not developing these new resources. Desalination may be an important water supply management practice in the future. These practices are addressed in sections 760-1-1-.08 through 760-1-1-.108 through 10 of this plan.</p>	
<p>Steve Williams</p>	<p><i>10/30/2007 11:44:13 PM SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>Reservoirs are mentioned in the state plan, however the specific kind is not. Lakes always seem to be implied. I propose the use of cisterns for rain water be promoted, because they are an on site storage for non potable water the would require less energy and money to implement as well as they are a great help in reducing stormwater runoff. Lakes are an inefficient way to store water between evaporation and sewage. The bigger the lake the less efficient Cistern on site storage also removes the issues of stream flow issues. The use of green roofs can help reduce and slow stormwater runoff asa well as decrease the heat island effect and help bring rain back top metro areas.</p>	<p>This comment highlights management practice 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.</p>
<p>Joe Cook Coosa River Basin Initiative</p>	<p><i>10/31/2007 SECTION 7: WATER QUANTITY MANAGEMENT PRACTICES</i></p> <p>In Policy Statement (1) on Page 1 I would recommend deleting the following phrase: "or, when it can be done without unreasonably foreclosing opportunities for other users, to supplement the sustainable yield of a water source." This statement opens the door to interbasin transfers and other water diversions that always have some impact to other users and uses. Supplementing the "sustainable yield" of a water source means continuing growth in areas that have already reached their capacity. The state water plan, can and should be used as a tool to manage growth. By implementing appropriate policy, this plan can attempt to direct growth to areas of the state where water resources are available to sustain growth. Adopting policy statements that encourage continued growth in already</p>	<p>Following consideration of comments on the June 28th and September 13th drafts, the Water Council reaffirmed the basic approach of providing flexibility for regional planning to consider tools to supplement the water available from a given water source. Use of those tools would be guided by state policies, and the resource assessments and regional</p>

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	stressed areas should be avoided.	water plans proposed in the current draft will provide information that can better inform decisions about growth and development.
james scarbrough gwinnett water resources	<p><i>9/28/2007 10:10:12 AM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Background: We do not perceive reading this section that agriculture is included in the Demand Management statewide. We believe that agriculture must be an equal partner in demand management for the state to have credibility with water providers to citizens and in the interstate disputes about water quantities at the state line. First paragraph, last sentence "...of conservation practices and ("measurement of") progress toward specific conservation goals." Implementation Actions Here again this section would be much more appropriate for a DNR Board rule than in the state plan.</p>	<ul style="list-style-type: none"> • The provisions of the draft plan, including those regarding agricultural water use, follow the authority established by current statutes and the language is consistent with those statutes. • Section 8 has been revised to provide for Board consideration of rulemaking regarding water conservation.
Rae Sikora	<p><i>10/19/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	Repeated comment: See above for response.

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<p>Kellie Bowen</p>	<p><i>10/21/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The drought is sadly the last straw that broke the camels back. Unbridled growth in the entire state, especially Atlanta, was not matched by adequate water supply. Water authorities and managers cannot allow explosive growth and alarming numbers of water meters to be hooked up to the system without having the supply to handle the demand. Drought conditions should be planned for and that lack of planning is nothing more than rolling the dice and hoping there won't be a drought or any other situation for that matter that will cause a crisis such as the one we are facing right now. Lake Lanier is not growing and even if there was adequate rainfall the lake cannot keep up with the growing demand. There has been a collective failure at all levels of government agencies that allowed the entire state to end up in this crisis. Our livelihoods are at stake, our economy is at stake, and our environment is at stake all because of poor planning and the lack of foresight to plan for a drought. Effective water conservation is not achieved by ordering a total water ban that puts Georgians in the Urban Agriculture Industry out of business while failing to address other industries and businesses that consume huge quantities of water. Urban Agriculture is responsible for \$8 billion in sales yearly and a total water ban is nothing more than a band aid that is unable to heal the wound called "a water crisis". My message that everyone must not ever forget is that poor planning and unbridled growth is the root of the crisis. The drought is merely a symptom of the total failure of the state to be prepared for any situation that could threaten all Georgians.</p>	<p>Repeated comment: See above for response.</p>
<p>Steven Hale Georgians for Pure Water</p>	<p><i>10/26/2007 7:04:48 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Throughout the plan, but particularly in Section 8, the vague, ambiguous, and permissive language cripple the effectiveness of planning and regulation, no matter how well-intentioned such efforts may be. It is disappointing that comments from various sides requesting that actions and conditions be spelled out were ignored in this draft. Unfortunately for the state's environment and the health of its residents, loopholes in existing O.C.G.A. and DNR statutes and rules</p>	<p>Section 8 has been revised to provide for Board consideration of rulemaking regarding water conservation. Rulemaking by the DNR Board, after adoption of the comprehensive statewide plan and</p>

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	<p>have permitted widespread abuse of the principles of protection for all citizens. Terms like "flexibility" may sacrifice the wellbeing of citizens in favor of the convenience of certain water users. Throughout the document, phrases like "The Director may" relegate important and complex decisions to a single individual, and a politically appointed individual at that. If the council determines that a particular course of action best serves the state, then it should require the Director and the Division to follow this course. Permissive language like this presumes that the Director is a reasonable and fair person. While hopefully that will always be the case, it may not always be, and political appointees may be removed by the political appointer if the short-term interests of a particular voting group are more important to the appointer than are fairness or long-term interests of the state. If the Director is so knowledgeable and equitable that her or his judgment is to be trusted, then why is the suggestion itself necessary? By using wiggle words, the Council is shirking its responsibility. Section 2 b and 2 c contain serious loopholes, since the Director may require "some of all of the following water conservation practices...." In both cases, "some" of the practices require nothing more than measuring data or creating a plan. While these preparatory steps may in fact be necessary first steps, they are not sufficient to bring about any actual conservation unless actions that correspond to the data or plan are required. Requiring an abuser to record abuses without remedying them simply adds insult to injury. Sections 2 d, 2e, and 2f use concepts like "progress toward..." "measurable improvements" "measurable outcomes." Progress toward a goal may be so minuscule that one never attains that goal. An improvement or outcome may be (and certainly should be) measurable, but again, what is required is ADEQUATE improvement or a SATISFACTORY outcome. Without precise, unambiguous language and logic, this document is at best wishful thinking, and at worst a capitulation to those who would despoil the state for their own selfish, short-term benefit. Wishful thinking, however optimistic, will not protect the environment and the citizens.</p>	<p>completion of the water conservation implementation plan, would provide a forum in which to raise some of the issues noted here.</p>
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:32:03 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p>	<p>Revisions to the December 5th draft include links to the State</p>

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	<p>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>Energy Strategy in the guiding policy statements and in the provisions for regional planning.</p>
<p>Kimberly Learnard</p>	<p><i>10/30/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Conservation is standard practice in many regions. My daughter lived in Spain through a UGA program this summer. In Cadiz, Spain, drought is perpetual due to climactic conditions. Every individual conserves water. Consumption that exceeds a set, documented amount per person is heavily penalized through the billing process. As Georgia's weather conditions continue to change, personal responsibility must increase, and financial penalties for overuse must be implemented.</p>	<p>The draft plan includes conservation-oriented rate structures among the water conservation practices that may be implemented by municipal water providers. This practice will be discussed further during completion of the water conservation implementation plan and subsequent DNR rulemaking, as described in <i>Section 8: Water Demand Management Practices</i>.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:48:04 AM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>This is one of the most important sections in the draft plan. The GWC strongly endorses aggressive water conservation practices, as they can often preclude the need for more expensive and environmentally degrading infrastructure such as reservoirs and IBTs. While the language in this section is a step in the right direction, we do not believe that it goes far enough to outline the extent of conservation that EPD expects from water users around Georgia. In paragraph (2)(a) of the implementation actions, EPD will require water withdrawal permit applicants to demonstrate “progress” towards water conservation “goals” before a permit will be granted. Neither of these terms is defined. Both terms are critical to understanding where conservation fits into water management in Georgia. Is 5% of a goal enough to show “progress”? Is 50%? What “goals” does EPD contemplate? Similarly in paragraph (2)(f), the requirement that a water user provide “measurable outcomes” is vague and should be defined according to</p>	<p>Most of the issues raised in this comment will be addressed in development of the water conservation implementation plan and in action by the DNR Board following completion of that plan.</p> <p>Revisions have been made in <i>Section 8: Demand Management Practices</i> to clarify that the benefits of reuse will depend on the conditions of the water source and should be considered during</p>

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	<p>concrete guidelines. We believe that some conservation practices make more sense in certain parts of Georgia than in others. Any conservation implementation plan should reflect those regional differences but should also include statewide practices with aggressive but realistic goals and benchmarks. As we have seen with the MNGWPD, some conservation practices will not be attained without holding water users to enforceable timetables; many entities in the MNGWPD have not put conservation measures in place that were promised four years ago. The plan is unclear as to whether EPD will actually be able to deny a water withdrawal permit application from a permittee that has not met certain water conservation criteria. The language speaks to water conservation “progress” being a prerequisite to obtaining a new or modified permit, but the rules should also make clear that EPD has the power to reject applications from permittees that have not demonstrated adequate water conservation. While the GWC supports water reuse as a viable practice, water reuse should not encourage added capacity, such as the withdrawal of more water from rivers and streams. People may change behavior to water lawns more knowing that it is reuse water, which could result in an aggregate increase in water use, much of it consumptive use. Practices should be in place to prevent this result. Paragraph (2)(b)(i) needs to define the frequency at which municipal water providers and private utilities must audit their water systems. Furthermore, (b)(ii) must include an expanded definition of “tiered conservation-oriented rate structure” as recommended in the “Definitions” paragraph above. For clarity, this sentence should also be redrafted so that water providers “design” instead of “adopt” water bills to clearly reflect consumer usage. Generally, we believe that farm uses of water should be required to implement certain, specific conservation practices, as municipal and industrial users are required to do. This will allow all water users in Georgia to be on an equal playing field with regard to this essential aspect of water management. We encourage the Water Council to recommend that the General Assembly make this change to the existing statutes. We also strongly recommend that water conservation in thermoelectric power generation be specifically addressed in this plan, since this practice is such a large consumer of water.</p>	<p>regional planning.</p> <p>The provisions of the draft plan, including those regarding agricultural water use, follow the authority established by current statutes and the language is consistent with those statutes. Provisions which would require statutory change are beyond the scope of the state water plan.</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>
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<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:15:46 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Section 8: Water Demand Management Practices Policy The policy statement in Section 8 (1) must make clear that existing conservation efforts and early reduction efforts for water reduction will be recognized in the long range planning and establishment of water conservation goals, so those who have been proactive will not be penalized, such as would occur with “percent reductions” criterion over and above what has already been done, when compared with those who have not been as proactive. The following sentence should be added to the current item (1) or added as a new item (3) “Existing conservation efforts and early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing the water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.” The policy statement in (2) is good if the definition of the term “water reuse” is amended as proposed above for Section 2, although “water reuse” should be in bold print along with “reclaimed water”, the “or” changed to “including” to make this clear. The language would read: “(2) Water reuse, including the use of reclaimed water...” Internal reuse is a very viable water resource management tool in many instances, especially in industrial facilities, and various methods for such internal reuse are listed as a management tools in the implementation actions under Section 8. But this practice is seldom free and often not easy. Including internal water reuse for credit as water reuse will encourage industry investment in more internal recycling and reuse, and will help achieve the policy objective of lowering demand, more quickly and more cost effectively than reliance on use of reclaimed water only. Not allowing such credit will have the counter effect. Implementation This section is problematic in several areas, as discussed below. It is much too detailed and includes requirements that are not reasonable, useful or even workable in some cases. First, the bulk of the requirements are placed on industrial users and nothing more than “encouragement” of conservation for farm-related users, regardless of the volume of water withdrawn for such use. On</p>	<ul style="list-style-type: none"> • In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to clarify recognition of conservation efforts that have already been implemented and/or water use efficiencies that have been accomplished. Revisions are also intended to clarify other ways in which flexibility is provided to water permit holders and applicants. Some of the specific language changes suggested here were included in these revisions. • Revisions have been made in <i>Section 8: Demand Management Practices</i> to clarify that the benefits of reuse will depend on the conditions of the water source and should be considered during regional planning. • This comment also raises issues that are being considered in development of the water conservation implementation plan and may be considered in action by the DNR Board following completion of that plan.
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	<p>the other hand, the industrial users are saddled with excessive monitoring, audits, studies, reporting, reduction goals and demonstrations of improvement, with no consideration for those facilities who are already being proactive in water use reduction, no consideration of the wide variety of industrial users or their industry specific needs or capabilities, or site specific situations. It also is ambiguous about the protection of the rights for reasonable use by existing users and permit holders. Implementation item (1) should reiterate the additional policy language as follows: “g. Existing water use conservation efforts and early reductions following adoption of the Water Plan but preceding its full implementation shall be recognized and credited in establishing water conservation goals and gauging water use efficiency, to encourage and maintain early action on water conservation and water reuse measures.” The implementation action in Section 8(2) a., should be made clear that, if this particular set of provisions applies to existing permit holders for renewal of existing permits with no increase or expansion, as well as new permits or expanded permits, that the permit holders will get credit for reductions they have already implemented ahead of the renewal and that they will not be saddled with unreasonable or unachievable reduction goals. Language similar to that suggested earlier should also be incorporated here, such as: “iv. Existing conservation efforts and prior reductions in water use shall be recognized and credited in establishing water conservation goals and gauging water use efficiency.” Many water permittees have been aggressive in reducing their water use voluntarily, and they should not be penalized for being proactive with arbitrary goals such as % reduction requirements in permit renewals. In both (2) b. and (2)c. the cost of such requirements should be a consideration, with flexibility to give more emphasis to those with the highest benefit for the cost expended. This can be accomplished by amending the opening paragraph in each section to read: “...water conservation practices to the extent that the Director reasonably determines such measures to be cost effective and reasonably applicable to the applicant.” In both (2) b. and (2)c. reference is made to “metering all water use that are not currently metered”. This language is unclear and, if taken literally, overly broad and unreasonable. Although we believe it means to meter all the water coming into a facility (public or</p>	
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industrial), it could be construed to mean water meters are required on virtually every spigot and faucet. This language needs to clearly state that the intent is the former, i.e., to meter the input to any facility/location of any currently unmetered water use, but not every point of use, as could be implied with the current wording. It will suffice to meter the main line(s) into a facility or location to measure the total water input, sufficient to determine the overall water use per unit of production, total water use for a recreational facility or public building, or water use per residence, but not every point of use within that facility. The expense to meter each process water line in an industrial facility would be cost prohibitive, would be very difficult to maintain the operation and accuracy of the meters and to monitor the data, and, it would not produce data any more useful than with the major line metering. The language in (2)b.iv. is at least qualified to some extent by DNR rules already in place, but there is no such clarification or limitation on the language in (2) c.ii., and it shows a real lack of understanding of the complexity and capabilities of industrial facilities. The wording for industrial permittees should be changed to: (2) c.ii. “Measure all water input to the facility not currently measured;” Leaving the language as “all water use” is confusing and, if taken literally, is both unworkable and unnecessary. Similar changes need also to be made to the language in Section (2) b. for water providers. The wording in Section 8(2) c.i must be changed to replace the abbreviation “i.e.” with “e.g.” in (2)c.i.(1) – (4). The former abbreviation means “that is” and is followed by a specific, inclusive list of the options, with no additions. The abbreviation “e.g.,” means “for example” and when followed by a list gives representative examples but is not all-inclusive as “i.e.,” makes it. Since there are many ways to accomplish the specified objectives over and above those listed, and some listed are only appropriate in limited situations, it is clear the intent of the language is “e.g.,” In other regulatory situations, the inappropriate use of “i.e.” was legally binding and required formal rulemaking to correct the error. Now is the time to make this change. The provisions in (2) c. are much too detailed for the Water Plan; use undefined terms and ambiguous language, and illustrate a clear lack of understanding of the complexity of and differences among the wide variety of industrial facilities in Georgia. Such specificity should

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	<p>be left to EPD to incorporate through their rulemaking and permitting processes. For example, in (2) c.iii, the current language requires the “measurement of all uses of reclaimed reuse or recycled water”. However, neither of these terms (reclaimed reuse or recycled water) is defined. Measuring “reclaimed water use” refers to a term which is defined in Section 2 and would not be unreasonable since the reclaimed water input to a facility is also a water input to the facility. However, measuring all “reclaimed reuse” (an undefined term that could be construed as all internal reuse of reclaimed water) or all “recycled water” (another undefined term that could be construed to mean all internal reuse), both of which would be impossible to measure for many, if not all, industrial facilities. And it is totally pointless information. The real metric of concern should be net water use/unit of production, with credit for reclaimed water use in lieu of fresh water. How much water one actually brings in and uses per unit of production is the key, regardless of how many times over it is used! Whether a facility is able to reduce water use by conservation or by internal recycle, the end result is reduced water use. Let economics within the facility dictate which is more feasible and cost effective. The requirement to “report on a regular basis” is ambiguous and unnecessary for such a high level policy document as the Water Plan. Water permit holders already have to submit semi-annual reports to EPD. Any needed reporting can be incorporated into that reporting by EPD as a condition of the permit. Leaving the inappropriate abbreviations in (2)c.i. uncorrected (leaving as i.e., instead of e.g., as discussed above) would severely limit the usefulness and applicability of this provision. We have assumed, as discussed above, that (2) c.ii is a problem of poor wording, and that the intent is not extensive internal metering of every point of use of water. However, if that assumption is wrong (which could be construed by the subsequent wording in (2) c.iii) and the latter meaning was the actual intent, this provision is not workable, not cost effective, and would not provide any useful data. This line must be changed or deleted. We have proposed alternate language above. Section 8 (2) talks about conservation and efficiency use goals, including reporting on water efficiency for industrial facilities, but specific metrics are not mentioned. For industry, the Water Plan should state that metrics must be site-specific, but the</p>	
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	<p>general metric should be “water use per unit of production”, regardless of whether or not it is consumptive use as defined in the Water Plan. (Using consumptive water use as the metric would skew the data and make facilities supplied by groundwater, i.e., 100% consumptive use, appear very inefficient compared to those with surface water return, where only net use is considered.). The Water Plan must also recognize that this metric is meaningful only when compared among like-industries or for the same facility over time, since some businesses and industries are direct users (e.g., electric utilities, heavy industry, food production, and other facilities with more water-intensive processes) and others are indirect users who rely on the products of direct users as their raw materials and process materials (e.g., consumers of electricity, paper, chemicals, fuels, foods, containers & packaging), but nevertheless, depend upon such water use having taken place. Thus water efficiency can be assessed for a facility, but it should be for measuring improvement and not for comparison among dissimilar industries. For areas served by surface water, an additional metric of the % consumptive use would be useful for Regional planning purposes, but it is subject to the same constraints noted above, for comparison among like-industries, for the same facility over time, and for the same water supply regime (i.e., using surface water that can be returned to the receiving stream). However, even in such facilities there may be additional site-specific considerations to factor in as well, such as non-contact cooling water uses that do not impact measurably either water quantity or quality. Section 8 (2) talks about Monitoring and Measuring water use for municipal users and other water providers but, like the overly burdensome language for industrial users, it does not include any discussion of metrics or water efficiency. For Municipalities and public water providers, an important metric is the water use per capita or per household. While there may be a lack of precision in the denominator, cities and water providers typically have a good estimate of the number of people/homes they serve. This metric would be especially important for comparison over time for the same city to monitor progress, but it could also provide useful information on achievable goals and best practices when compared to other cities’ water use per capita. The metrics should include items like total water withdrawals to the system, net consumptive</p>	
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	<p>use, and use of reclaimed water and an estimate of the population served. In times of plentiful rainfall, the cities supplied by surface water can be more lenient, but unless the city's capabilities are known and mechanisms in place to reduce usage as water resources first begin to fall , the current drought crisis in the metro-Atlanta area will repeat itself there or in other growing cities in Georgia.</p>	
<p>Mike Eisen</p>	<p><i>10/30/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Should require all multi-family on master meters to sub-meter and like Florida, require all new irrigation systems to have rain sensors, but also require all existing irrigation systems to install these as well.</p>	<p>Sub-metering is included in the draft plan as a practice that municipal and private water providers may implement. Additional or stronger provisions regarding sub-metering, rain sensors, and other water conservation practices may be considered in regional water planning, depending on the condition of a region's water sources.</p>
<p>Nina Lovel Coosa Valley Technical College</p>	<p><i>10/30/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>I would like to see stronger language requiring municipalities to perform maintenance and upgrades on their water supply lines in order to reduce the amount of water lost through leakage before it ever gets to its destination.</p>	<p>Water loss control programs are included in the draft plan as a practice that municipal and private water providers may implement. Alternatively, these providers may demonstrate progress toward water conservation goals; water loss control programs may well be a key contribution to that progress. Additional or stronger water conservation provisions may be</p>

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		<p>considered in regional water planning, depending on the condition of a region's water sources.</p>
<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:40:02 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Potential impacts to the regulated community: In "Water Demand Management Practices", permittees are required to demonstrate progress toward water conservation goals or water efficiency standards identified in the water conservation implementation plan, or demonstrate the implementation of the appropriate water conservation practices listed in this section as well as sections 391 -3-6-.07(4) and 391-3-2-.04(11). The water conservation implementation plan is not currently available for review or comment and is not expected to be in final form before a Water Plan is presented to the legislature in January 2008. Therefore, at a minimum, it should be clearly stated that requirements related to the conservation implementation plan will be effective only after the conservation implementation plan is finalized through a normal public input process. It is also important that any additional considerations or criteria for permits include economic considerations as commonly set forth in existing statutory and regulatory provisions. Solution: See Attachment I, Recommendation #7.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<p>In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to specify that the water conservation implementation plan will be developed with assistance from stakeholders from multiple water use sectors. In addition, the current draft proposes Board consideration of amendments to rules regarding water conservation, following completion of the water conservation implementation plan. Revisions also include language to provide for due consideration of technical feasibility and cost effectiveness among other factors.</p>

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<p>Glenn Page Cobb County-Marietta Water Authority</p>	<p><i>10/30/2007 3:03:44 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Requirements for permit holders should not be limited to those who hold withdrawal and/or discharge permits, but should also apply to OPERATING permit holders. Many systems purchase all or part of their water from wholesaling entities, and should be responsible for their individual wate demand management practices.</p>	<p>The current draft provides flexibility for municipal and private water utilities and providers to decide 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>Gary Dennis SE Car Wash Assoc.</p>	<p><i>10/30/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The GA chapter of the Southeastern Car Wash Association has recently made a proposal to GA EPD asking for their support in an industry-backed certification program. We believe certification is an integral part of sustainable and permanent reductions in water demand and compliments the stated objectives of the state's water plan. Certification is a self-imposed, best management practices set of standards that is 100% funded by the private sector. Addressing the stated issues in section 8 related to voluntary water conservation with no measure of effectiveness, certification sets a clear standard within a particular industry of what level of conservation must be reached. In the case of the car wash industry, the over-riding criteria is that certification requires at least a 50% reuse of water used in previous washes. In addition, there are other requirements to certification including annual replacement of nozzles, maximum GPM flow rates on nozzles, incorporation of charity washes at commercial carwashes, etc. Working with municipalities and water purveyors, the certification process is easily implemented and requires annual compliance. Certification also addresses the issue of how to implement water use restrictions without unfairly targeting those that have already taken the necessary steps to reduce consumption. The car wash industry has made great strides in conservation and was eager to propose the</p>	<p>This comment provides information relevant to development of the water conservation implementation plan and may considered during action by the DNR Board following completion of that plan.</p>

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	<p>certification program to the EPD. Several municipalities across the country have adopted the certification program with outstanding results. One notable example is the city of San Antonio where water use per capita has declined dramatically over the past 10 years since the certification process was implemented. The program can be easily adapted to other industries such as developers, home builders, landscape & irrigation firms, restaurants, hotel/motel operators, grass producers, manufacturers, and building owners & managers. Rather than a broad range of ideas or suggestions proffered by EPD and local municipalities, each certification program identifies specific conservation measures applicable to a particular industry. Once implemented, the certification process can be required for new permits ensuring sustainable savings into the future. Compliance is ensured by utilizing licensed and bonded contractors that are paid by the industry with virtually no cost to government. The certification program requires direct involvement from the private sector and reduces the burden on local municipalities to uniformly and fairly implement water usage requirements. It is anticipated that certification can be used as the primary criteria when enforcing various drought-level restrictions. We believe the current plan needs to incorporate these types of ideas so that the private sector can provide best water management solutions that are specifically tailored to particular industries and can effectively address the over-arching goals of reducing water demand through various conservation techniques.</p>	
Steve Williams	<p><i>10/30/2007 11:53:08 PM SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Look into power sources that are less demanding and dependent on water use (fossil fuel and nuclear energy) Provide incentives for efficiency.</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>

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<p>Crista Carrell GACDS</p>	<p><i>10/30/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>The Georgia Association of Conservation District Supervisors (GACDS) appreciates EPD and the Water Council's thoughtful review of public comments as the Comprehensive Statewide Water Management Plan is created. Because of the limited availability of funds to implement the plan, we recommend that water resource assessments be the top priority. We favor the implementation of the plan in phases so that facts on water quantity and quality are known before development plans are approved. We agree that water conservation should be a water quantity management priority, and fully support the use of non-regulatory approaches to conservation through incentives, education, and adequate funding to help achieve conservation goals.</p>	<ul style="list-style-type: none"> • In the December 5th draft, <i>Implementation of Regional Water Planning</i> has been revised to provide information on phasing of implementation with a timetable. • In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to clarify the ways in which flexibility is provided to water permit holders and applicants.
<p>Stephen Loftin Regional Business Coalition of Metro Atlanta</p>	<p><i>10/31/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>In Implementation Actions, item 1(b) should be changed to read “Guidance for best water conservation practices for each water use sector”. Items 2(b) and (c) should be voluntary, not required.</p>	<p>In the December 5th draft, <i>Section 8: Demand Management Practices</i> has been revised in response to this and related comments to clarify the ways in which flexibility is provided to water permit holders and applicants.</p>
<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 SECTION 8: WATER DEMAND MANAGEMENT PRACTICES</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>Repeated comment: See above for response.</p>

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<p>james scarbrough gwinnett water resources</p>	<p><i>9/28/2007 10:12:51 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>Policy. On-Site Sewage Management Systems. Some credit must be given for return flows from septic systems. The details of this technical information should be in a DNR Board rule. Implementation Actions These details should be in a DNR Board rule. Policy Land Application Systems. Again there must be credit for returns to the stream from LAS systems. The details of how one would do this should be in a DNR Board rule.</p>	<p><i>Section 9: Water Return Management Practices</i> has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources. This comment highlights information needs that will have to be addressed in development of that guidance.</p>
<p>Todd Rasmussen The University of Georgia</p>	<p><i>10/3/2007 9:16:23 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>The claim is made that "on-site sewage systems can be slower to return water to streams than centralized wastewater treatment systems ...". This statement, without supporting caveats, is clearly a gross hydrologic mis-statement or error. When the amount of water flowing through a hydrologic system is constant (i.e., the system is at steady state), there is no delay between the hydrologic input and the output. In layman's terms, a constant inflow of water into a full bucket (whether it is a pond, lake, or aquifer) is always balanced by an equal outflow. While there may be a water quality delay (as measured using the mean residence time, equal to the water volume divided by the flow rate), no such time measure is appropriate for the hydraulic response. The only mechanism by which there could be an imbalance between hydrologic inputs and outputs is if there were to be a change in storage within the system. Yet onsite systems are noted for their steady flow behavior, and no technical basis for concluding that these systems affect storage is provided. Further, even if storage were to be present, there would a long-term balance between gains and losses to storage, so that there would never be a net delay. Thus, the claim that "This short-term lag contributes to the cumulative consumptive use in a sub-basin or watershed." is completely false and erroneous, and is based on an inaccurate and incomplete understanding of</p>	<p><i>Section 9: Water Return Management Practices</i> has been revised to say that guidance for regional planning may include region-specific benchmarks for return flows to individual water sources. This comment highlights information needs that will have to be addressed in development of that guidance.</p>

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	<p>hydrologic processes. The only situation in which storage may be an issue is when the onsite system is first installed, which may require rules or regulations related to installation during drought periods. I suggest that this section be reconsidered to remedy these (and other) hydrological errors.</p>	
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:48:27 AM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>This paragraph concerns onsite sewage management systems, land application systems, and centralized water treatment in Water Pollution Control Plants. Fundamentally, we believe that EPD should have sole responsibility for managing septic systems. The Department of Human Resources currently manages aspects of the program, making septage the only wastewater that EPD does not regulate. The policy concerning land application systems (LAS) should be toned down. LAS has been and can be used effectively in some instances, but it has not always been used without harmful consequences in the past. In addition, there may well be better management practices in the future than LAS, so the plan should not be so insistent that LAS “must” be used in the future. This section also needs stronger language regarding water quality protection and stronger language acknowledging the importance of protecting groundwater recharge areas.</p>	<ul style="list-style-type: none"> • Changing the agency responsible for management of septic systems would require statutory change and so, is beyond the scope of the state water plan. • Land application systems will continue to be a management practice in the toolbox available for consideration in regional planning, along with other management practices that may be developed in the future, as the comment notes. Regional planning provides an opportunity to select the specific practices that best fit the characteristics of specific regions and specific water sources. • In response to this and related comments, the December 5th draft has been revised to reference the state’s program for protection of water supply watersheds and aquifer recharge areas.

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Virginia Holton Packaging Corporation of America	<p><i>10/30/2007 12:16:29 PM SECTION 9: WATER RETURN MANAGEMENT PRACTICES</i></p> <p>Section 9: Water Return Management Practices The discussion of land application systems (LAS) is much improved over the June draft, where the water quality considerations for LAS were virtually ignored. Particularly in areas where there is no large receiving water to provide assimilative capacity, LAS are a vital waste management tool to protect the instream water resource quality, even where it may not provide a fast return to the receiving stream. While quantity should be considered in permitting decisions for deciding between a LAS or a direct discharge, in the end, water quality must trump.</p>	<p>This statement is generally consistent with the approach taken in the current draft.</p>
james scarbrough gwinnett water resources	<p><i>9/28/2007 10:17:15 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Implementation: These details should be in a DNR Board rule. We do not agree that any water supply reservoir that does not use the full yield for water supply cannot be permitted. We believe that in an area of the country that has an average of 50 or more inches of rainfall, other uses of reservoirs can be considered and permitted such as recreation in particular. There may be cost sharing opportunities from federal agencies or private organizations that would make a multipurpose reservoir very attractive. This prohibition seems unreasonable. Interbasin Transfers Implementation Actions. Again these details should be in a DNR Board rule. Aquifer Storage and Recovery Implementation Actions. These details should be in a DNR Board rule.</p>	<ul style="list-style-type: none"> • The sub-section on water supply reservoirs has been substantially revised in the most recent draft. Among other elements, the provision regarding “full-yield” of reservoirs was revised to indicate a preference rather than state a prohibition. • As noted above, the Water Council has included additional detail to provide information on the intent and potential implications. The current draft,

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		however, proposes the specifics for consideration by the DNR Board.
Steven Marion	<p><i>10/7/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>HELLO? I Find it very hard to believe that in this 92 page “REVISED DRAFT COMPREHENSIVE STATEWIDE WATER MANAGEMENT PLAN” That you have absolutely “NO” mention of “protection” of the very WATER you are trying to plan for. Have any of you ever heard of Safe Drinking water? Adaptation of Backflow Prevention programs? Cross connection protection of the Drinking water system? You can find all the water in the world. But to make it safe and protect it from intentional or unintentional contamination is most important and cannot be left out... Have any of you even thought of asking a Plumber how to keep it safe??? Start with the “University of Florida TREEO center” and then maybe contact the “American Backflow Prevention Association” this could help you “KEEP THE WATER WE HAVE SAFE”</p>	Repeated comment: See above for response.
wilbert	<p><i>10/9/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their oportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	Repeated comment: See above for response.

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<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i> I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Theodore Book</p>	<p><i>10/19/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i> I would like to encourage policies liberalizing the restrictions on interbasin transfers, so that the needs of human consumption take priority over other considerations.</p>	<p>The Water Council considered revisions to the interbasin transfer section and ultimately concluded that the permitting criteria proposed in the draft plan, in conjunction with regional water planning, are appropriate to protect the reasonable use of water in donor basins through regulation of interbasin transfers.</p>
<p>Kellie Bowen</p>	<p><i>10/21/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i> The drought is sadly the last straw that broke the camels back. Unbridled growth in the entire state, especially Atlanta, was not matched by adequate water supply. Water authorities and managers cannot allow explosive growth and alarming numbers of water meters to be hooked up to the system without having the supply to handle the demand. Drought conditions should be planned for and that lack of planning is nothing more than rolling the dice and hoping there won't be a</p>	<p>Repeated comment: See above for response.</p>

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	<p>drought or any other situation for that matter that will cause a crisis such as the one we are facing right now. Lake Lanier is not growing and even if there was adequate rainfall the lake cannot keep up with the growing demand. There has been a collective failure at all levels of government agencies that allowed the entire state to end up in this crisis. Our livelihoods are at stake, our economy is at stake, and our environment is at stake all because of poor planning and the lack of foresight to plan for a drought. Effective water conservation is not achieved by ordering a total water ban that puts Georgians in the Urban Agriculture Industry out of business while failing to address other industries and businesses that consume huge quantities of water. Urban Agriculture is responsible for \$8 billion in sales yearly and a total water ban is nothing more than a band aid that is unable to heal the wound called "a water crisis". My message that everyone must not ever forget is that poor planning and unbridled growth is the root of the crisis. The drought is merely a symptom of the total failure of the state to be prepared for any situation that could threaten all Georgians.</p>	
Blaine Williams	<p><i>10/23/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Regarding interbasin transfers, an equal amount of water that is taken out of a donor water basin should be returned in the form of highly treated wastewater. Although this may represent more infrastructure cost in the short term, it will avoid longer term and perhaps more substantial natural and economic costs to the flora, fauna, and citizens of the donor basin.</p>	<p>The Water Council considered revisions to the 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>

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<p>Pete McDonald Coosa Valley Technical College</p>	<p><i>10/23/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>I believe the use of water resources must be controlled to return water used to its original point of origin within a watershed basin. The movement of water resources from one basin to another and not returning it will have a dramatic negative impact on the quality of life for humans, plant life and wildlife in the affected areas.</p>	<p>The Water Council considered revisions to the 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>
<p>Steven Hale Georgians for Pure Water</p>	<p><i>10/26/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>The regulation of Interbasin Transfers requires substantially more detail if the environment is to be protected and the citizens of Georgia and surrounding states are to be served equitably. (1) Given the jurisdictional and geographical complexity of most basins, returning water from the receiving basin to the donor basin will be of little help to certain residents of the donor basin unless water is returned to the specific SOURCE from which it was taken. (2) Section c iv does not state how the Director is to decide on IBT if both the donor and receiving basin residents face emergency shortages. In such conflicts, reasonable preference should be accorded to the donor basin if the receiving basin's shortage is due to its refusal to regulate growth or prepare in advance for shortages through land use planning, conservation, pollution prevention, and other reasonable responses. (3) The issue of timing (vi) is insufficiently addressed. Delay in the return of water to the basin of origin severely limits the usefulness and fairness of the IBT process. (4) The issue of interstate water needs is insufficiently addressed. Residents of two different states who share the same basin and ecosystem may have more needs in common than do residents from different basins within the state.</p>	<p>The Water Council considered revisions to the 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>

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<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:32:59 PM 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>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>Tony Dinatale</p>	<p><i>10/29/2007 6:49:57 PM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>I have information using the latest technology in the solar distillation process as part of the solution to your water storage problem. I hesitate to give any more information at this point since I understand that it becomes public knowledge and I wish to protect my plan at this time. I would prefer a closed meeting with the proper people at their convenience. Thank you.</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:49:15 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Reservoirs The GWC believes that reservoirs should be considered only as a last resort for water supply in Georgia, as they involve considerable economic and environmental costs to construct. In general, we support the EPD's proposed role in future permitting of reservoirs, as we have long advocated for centralized planning and review for reservoirs to reduce their cumulative impacts. However, we would strengthen this language even more. In paragraph (3) of the implementation actions, we recommend that language be added that EPD must base its decision on permitting a reservoir on the factors that are listed, not just "consider" them. EPD should study the proposal in a transparent manner that allows for public involvement and input; rigorously evaluates the direct, indirect, and cumulative impacts of reservoirs on the environment and local and downstream economies; and base its decision on whether to permit a reservoir on the factors in paragraph (3). When assessing need, we suggest that "demand forecasts shall be based on populations that do not already have supply allocated</p>	<ul style="list-style-type: none"> • A number of other comments raised concerns about duplicative permitting processes and additional impediments to reservoir permitting. In light of these comments, the Water Council substantially revised the sub-section on surface water storage has been substantially revised in the most recent draft. Among other elements, revisions clarify the focus on water supply reservoirs and clarify the water conservation provisions listed under full consideration of water supply alternatives. A state role in

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	<p>from other existing or planned projects.” Currently, (3)(a)(i) states that these forecasts “should” be this way, but it does not require them to be. We support EPD’s proposal to mandate the use of a reservoir’s full yield for water supply. Based on the definitions of “full yield,” however, we are uncertain how EPD proposes to evaluate multi-purpose reservoir proposals, particularly those to be used for recreation as well as water supply. We fully support the consideration of alternatives to water supply reservoirs, as long as such alternatives do not involve permit trading, water markets, desalination, or aquifer storage and recovery. We recommend that paragraph (3)(b) say only “full consideration of all water supply alternatives” and strike “concurrent with reservoir planning,” which is redundant. The exploration of “use of excess capacity in existing wells” and “use of excess capacity in existing reservoirs” stated in (3)(b)(iii) should be clarified to emphasize that this will not result in water withdrawal permit trading or a commoditization of surface and ground water resources. Cumulative impacts of reservoirs can be extremely significant to the overall health of a particular stream, river, or watershed. These incremental impacts can become collectively significant, so EPD should examine other past, present, and forecasted projects in an area when evaluating a reservoir proposal. Paragraph (3)(c) lists several important criteria to be examined in selecting a reservoir site that minimizes impact. However, it only proposes to examine habitat impacts “in the reservoir pool area and immediately downstream.” (3)(c)(iv). This provision should be expanded to include a cumulative impact analysis, including existing impoundments upstream and downstream of any proposed new impoundment, or cumulative impacts should be given their own subsection for mandatory EPD evaluation. Regarding paragraph (4), we reiterate the need for the Board of Natural Resources to finalize an instream flow policy that protects the values of fish and wildlife habitat and recreation. Interbasin Transfers The GWC believes that new or expanded IBTs should be prohibited unless EPD has rigorously analyzed less costly water supply alternatives, including vigorous implementation of all types of conservation measures; evaluated impacts to both the donor and receiving basins; and determined that the benefits of the transfer outweigh the negative impacts, with opportunities for public involvement. In paragraph (2) of</p>	<p>provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans is more clearly defined. Finally, the provision regarding “full-yield” of reservoirs was revised to indicate a preference rather than state a prohibition.</p> <ul style="list-style-type: none"> • The comment raises the question of incremental or cumulative impacts of reservoirs. Consideration of cumulative or incremental impacts may be addressed in the guidance on water supply reservoirs to be developed following adoption of the plan. The Division has worked with the Corps of Engineers to improve consideration of impacts in the alternatives analysis required for Section 404 permits and will continue to do so. • The Water Council considered revisions to the 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
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	<p>the policy, the plan states that Georgia will protect the reasonable use of water in donor basins. Does this reasonable use include the potential for future use or current uses only? On a related note, we ask for clarification from EPD when it states in paragraph (3) that IBTs will be allowed as long as they do not “unreasonably” foreclose opportunities for water use in the donor basin. IBTs inherently are not sustainable water uses, so that their employment to boost a given waterway’s “sustainable yield” severely diminishes the practical meaning of that term. While the proposed moratorium on interbasin transfers of raw water sounds like a step in the right direction, we note that these types of interbasin transfers are neither practiced nor proposed in Georgia at this time. Paragraph (2) of the implementation actions presents a list of factors that EPD “should” “consider” when evaluating an IBT permit application. The GWC supports the list but recommends that EPD “shall” consider these factors and must document these considerations, justify its decision in light of these factors, and include opportunities for meaningful public involvement in the process. Aquifer Storage and Recovery As stated above, the GWC does not believe ASR is a viable water supply alternative, and it is currently illegal for the largest of Georgia’s aquifers. We therefore recommend that the Water Council strike this section from the plan.</p>	<p>donor basins through regulation of interbasin transfers.</p> <ul style="list-style-type: none"> • ASR and several other management practices described in the draft plan would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could actively used within the context of a regional water plan. As the comment notes, these practices are among those available for consideration in regional planning. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory approval process, not by excluding such potential practices from the plan itself.
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<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:17:43 PM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Section 10: Water Supply Management Practices: The Surface Water Storage: Implementation Actions: The buying and selling of water by utilities across basin boundaries or water supply resources should be prohibited or at least, strictly limited. The water resource does not belong to the utility, whether public or private, to “sell” and regional /downstream users should not have their resources diverted to the highest bidder. It is particularly important that water from the Floridan aquifer and other groundwater resources not be diverted north of the fall line where surface water is the principal supply, due to the inability to replenish those groundwater resources in any reasonable time frame (i.e., often greater than 50 year planning horizons). Groundwater levels in the Floridan aquifer have fallen steadily over the last 30 years across the state, not just in the coastal areas. This has already already been manifested in diminished base river flows in the Flint and Suwannee river basins, where there is a hydrologic connection between surface and ground waters, impacting both human activities and aquatic habitat. Language in the Policy and implementation must state this limitation explicitly. Interbasin Transfers The interests and needs of all Georgia’s citizens, regional economics and eco-systems must be given equal protection, and the resources of a particular region should not be diverted to another region just because of greater political or economic interests in that region. Interbasin transfers should be limited to surface water only and should be a means of last resort, or used only when there is a surplus of water in the donor basin. Specifically, all feasible measures to manage, conserve, reuse, reclaim and reduce water use in a particular region must be made before any inter-basin transfers should be considered. Such things as advanced wastewater treatment and reuse have been successfully implemented in other areas of the nation with a chronic shortage of water supply. This level of treatment should be required of all centralized municipal wastewater with return of the reclaimed water to reservoirs and/or dual plumbing systems for sanitation devices and outside water use; along with adoption with strict enforcement of water conservation standards/goals, and demonstrated reduction</p>	<ul style="list-style-type: none"> • The December 5th draft places a number of restrictions on interbasin transfers. The Water Council considered revisions to the this sub-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. • The current draft recognizes ASR as management practice that may be help meet Georgia’s long-term water needs, and one that will require further definition, investigation, and regulatory approval prior to inclusion in a regional water development and conservation plan and subsequent implementation of the practice. The Council considered additional restrictions on the practice, but decided the provisions of the current draft, along with regional planning, would help meet the long-term goals for water management.
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	<p>and maintenance of per capita water use for municipalities and per unit production water use for industry and commercial users as standard requirements before entertaining any long term interbasin transfer scheme. It may even be necessary to impose temporary moratoriums on increased water withdrawals, (such as was done in coastal counties), until water use is managed at or below the resources available for that region. The language in (2)b.i. is much too weak and should be strengthened to say interbasin transfers are considered a means of last resort, and that actions such as those listed above are mandatory first steps. Proposed language is as follows: “ i. Determination of whether or not the applicant’s proposed use is reasonable, including consideration of whether the applicant has implemented all feasible, cost-effective water conservation practices, achieved reasonable water conservation goals, has explored all potential use of reclaimed water supplies and implemented it where practical, and the municipalities in the receiving basin have or are in the process of installing advanced water treatment systems to provide reclaim water for direct use and/or for return to the upstream water supply.”</p> <p>Aquifer Storage and Recovery This section addresses the potential alternative for aquifer recharge. It bans such recharge from being considered for Counties under the Georgia Coastal Zone Management program. This ban on recharge to the Floridan aquifer should apply to all Counties throughout the State and not be limited to the Coastal Counties. This resource is much too important throughout south Georgia and Florida to risk contamination. Item (1) under this topic should be changed to read “O.C.G.A subsection 125-5-135 prohibits the injection of surface water into the Floridan aquifer in any county governed by the Georgia Coastal Zone Management program, created by O.C.G. subsection 12-5-327, until December 31, 2009. This prohibition should be expanded to the Floridan aquifer in all counties in Georgia to protect this valuable resource, and the deadline of December 2009 should be extended indefinitely until such time as ASR has been proven as a viable technology without risk of aquifer contamination in other less critical aquifers”</p>	
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<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:43:38 PM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Protection of historical water supply purposes and use: While the draft plan primarily addresses new water supply reservoirs, we believe it is important that historical purposes and uses of existing private reservoirs throughout the state be preserved. Solution: See Attachment I, Recommendation #8.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p> <p>Reservoirs Georgia Power recognizes that the chairman of the Water Council has stated the need for additional reservoirs in Georgia and desire to streamline the permitting process for such. It is unclear how the additional requirements outlined in this section of the plan streamline the already arduous process. Because the permitting of reservoirs require federal agencies and processes outside the control of the State of Georgia, an evaluation of the current permitting process and barriers, as well as recommendations to streamline the process while protecting the economy and the environment, must be completed. This evaluation must be performed by key stakeholders integral to the reservoir permitting process such as Georgia EPD, U.S. Army Corps of Engineers, additional state and federal natural resource agencies and stakeholders. Solution: See Attachment I, Recommendation #8 and #9.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<ul style="list-style-type: none"> • Regarding the inclusion of language regarding historic purposes of existing reservoirs, the inclusion of such a statement in the statewide plan would not be consistent with the overall approach of providing the flexibility for regional planning to address the issues and options specific to individual regions. • The sub-section on surface water storage has been substantially revised in the most recent draft. Among other elements, revisions clarify the focus on water supply reservoirs and clarify the water conservation provisions listed under full consideration of water supply alternatives. A state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans is more clearly defined. Finally, the provision regarding “full-yield” of reservoirs was revised to indicate a preference rather than state a prohibition.
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<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:45:11 PM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Background Practices that supplement water supply can be an important part of addressing water supply and water quality needs in some parts of the state currently utilized. However, these practices can both have adverse and positive impacts on water resources and on opportunities for reasonable water use of these resources by other users. This plan addresses five water supply management practices: surface water storage, interbasin transfers, and aquifer storage and recovery development of desalination of sea water and augmentation of supply from the Tennessee River. To manage adverse and positive impacts and ensure opportunities for other water use and users, the plan provides for action by EPD in its guidance of regional planning and action by the Board of Natural Resources to amend the rules and regulations that govern water withdrawal permitting. Implementation Actions D. Quantitative analysis and possibly computer modeling to predict how ASR could affect movement of recharge water within the target aquifer and how water could move between aquifers in complex hydrogeologic regimes. E. A comprehensive study of the development of water resources not historically used for water supply must be included in water management practices. This study must include both desalination and augmentation from the Tennessee River and should provide analysis of the benefits of both the cost associated with developing and managing these new resources and the cost to the state's economy and the quality of life to its citizens of not developing these new resources.</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future demand. For those regions that do not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
<p>Nina Lovel Coosa Valley Technical College</p>	<p><i>10/30/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>The plan needs to more clearly set specific stream flow parameters by which donor basin impact will be measured when interbasin transfers are under consideration.</p>	<p>This comment raises an issue that may be addressed in DNR rulemaking on interbasin transfers, following adoption of the state water plan.</p>

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<p>Steve Williams</p>	<p><i>10/31/2007 12:10:34 AM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Reservoirs are mentioned in the state plan, however the specific kind is not. Lakes always seem to be implied. I propose the use of cisterns for rain water be promoted as reservoirs, because they are an on site storage for non potable water the would require less energy and money to implement as well as they are a great help in reducing stormwater runoff. Lakes are an inefficient way to store water between evaporation and sepage. The bigger the lake the less efficient it stores the water.</p> <p>Reuse rain water and storm water on site. Cisterns, vegetated swales and pervious concrete.</p>	<p>This comment addresses practices that may be considered during regional planning.</p>
<p>Ben Gandy Scapes, LLC</p>	<p><i>10/31/2007 1:52:09 PM SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>Reduce potable water demands by creating incentives for developers to place bodies of water on their properties as part of the development plan and use this resource for landscape irrigation. Exempt property owners from property taxes for land areas covered with permanent water features from which landscape irrigation water is drawn.</p> <p>Create efficiency standards for landscape irrigation systems. Publish these standards for use by municipalities for integration into their building codes (the Irrigation Association can supply such standards relating to a range of efficiency).</p>	<p>This comment addresses practices or provisions that may be considered during regional planning or during development of the water conservation implementation plan.</p>
<p>Stephen Loftin Regional Business Coalition of Metro Atlanta</p>	<p><i>10/31/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>In Implementation Actions, item (3)(a), eliminate subparagraph (iii). Restricting options such as multi-use reservoirs is not good policy. The EPD certainly has the power to deny a permit for a multi-use reservoir if, in its judgment, proper planning calls for a reservoir that has its full yield available for water supply.</p>	<p>The sub-section on surface water storage has been substantially revised in the most recent draft. Among other elements, the provision regarding use of full-yield for water supply was revised</p>

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		to indicate a preference rather than state a prohibition.
Joe Cook Coosa River Basin Initiative	<p><i>10/31/2007 SECTION 10: WATER SUPPLY MANAGEMENT PRACTICES</i></p> <p>While water conservation and evaluation of already existing water supplies are included in the list of criteria that the Director shall consider when evaluating permits for new reservoirs, I believe these factors need special mention in the guiding policy statment. Reservoirs should always be considered the last option for extending our water supplies because of their tremendous costs and their impacts to the environment and private property owners. Thus, I would recommend an addition of the following langauge to Policy Statement (1) under surface water storage: "However, due to factors limiting the viability of resrvoir sites and other significant impacts, reservoirs should be considered only after all other reasonable water supply options have been exhausted. The negative impacts of reservoirs include..." In the policy statements regarding interbasin transfers I would substitute the following langauge under Policy Statement (3)"Interbasin transfers may be undertaken to meet water needs in areas facing limitations on their water sources, as indicated when the forecasted consumption of water from a specific source approaches the defined sustainable yield, only when the transferred water is returned to the donor basin, less ordinary consumptive uses, as highly treated wastewater." In other words, a community may extend its water supply through the use of interbasin transfer, but that community must also build infrastructure to return the water to the donor basin. Adoption of such a policy will prevent conflicts between upstream and downstream users, and may also lead to curtailing growth in already stressed receiving basins while encouraging growth in donor basins where resources are available to sustain larger populations. Under "Implementation Plans (2)" I recommend that the langauge be</p>	<ul style="list-style-type: none"> • The change regarding the surface water storage policy that is recommended in this comment is not practical, given the time required for reservoir planning and development. However, it is important that water conservation, including current levels and potential future savings, as well as other alternative sources of supply be fully considered in reservoir planning. Among other factors, the provisions of the current draft are intended to improve that aspect of reservoir planning and subsequent permitting processes. • The Water Council considered revisions to the 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

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	<p>changed so that it reads: "in evaluating a permit application for a new interbasin transfer or expansion of an existing interbasin transfer, the Director shall consider the factors..." The "should" language is weak and implies that the Director can pick and choose the considerations outlined in this section. I endorse these considerations, but without stronger language, I fear these considerations will be ignored by the EPD Director. In general, I believe that interbasin transfers should be limited to emergency situations. Interbasin transfers should not be prohibited, but when they are used, the transferred water should be returned to the donor basin, less normal consumptive uses. The wholesale transfer of water without adequate returns to donor basins should not be permitted under any circumstances. Aquifer Storage & Recovery This is a speculative water management proposal, and I believe it should be struck from the state water plan. Investigation of aquifer storage and recovery should be undertaken only at a regional planning level.</p>	<p>donor basins through regulation of interbasin transfers.</p> <ul style="list-style-type: none"> • ASR and several other management practices described in the draft plan would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could actively used within the context of a regional water plan. As the comment notes, these practices are among those available for consideration in regional planning. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory approval process, not by excluding such potential practices from the plan itself.
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<p>james scarbrough gwinnett water resources</p>	<p><i>9/28/2007 10:33:13 AM SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>We believe that Georgia has an opportunity to put forth a new "Designated use" here. Small headwater streams in urban areas that are not susceptible to "swimming" should be designated as "wading" and protected from dermal contact for bacteria instead of the usual "swimming" that is based on ingestion of the water where the bacteria can cause intestinal illness if pathogens are encountered. We believe that this designated use can save millions of dollars where small streams do not meet the bacteria water quality standard for swimming (irrespective of what the standard ends up being) and there is not enough water in the stream literally, except during flood events, in which one could swim. We do not believe that people go swimming during the flood events. Obviously there would need to be a drainage area cutoff for this "wading" use but the small headwater streams do not need to support "swimming". We fear there will never be enough resources to ensure that all headwaters streams in urban areas meet the bacteria standard and we should maximize our efforts towards meeting the designated use and its water quality standards with the resources we have. Implementation. The plan says these requirements are found in sections 12 and 13. We believe that these sections 12 and 13 should be in the form of DRN Board rules other than for the background and policy statements.</p>	<ul style="list-style-type: none"> • This action was discussed during by the Basin and Statewide Advisory committees and was widely seen as undesirable. Based on that feedback, it was not carried forward into the draft plan. • As noted above, the Water Council has chosen a different approach, providing additional detail so the intent and potential implications are clearer than would be provided in a document limited to background and policy statements. The current draft, however, recognizes Board rule making authority where appropriate and proposes the specifics for consideration by the DNR Board.
<p>Rae Sikora</p>	<p><i>10/19/2007 AM SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming</p>	<p>Repeated comment: See above for response.</p>

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	<p>from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	
<p>Sara Barczak Southern Alliance for Clean Energy</p>	<p><i>10/29/2007 5:37:17 PM 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>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. The provisions for regional planning should apply to both water quantity and water quality elements of the regional plans.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:49:42 AM SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>In this section, EPD notes that less than 20% of the state's waters are currently monitored. Separately, in the policy paragraph (2), EPD states that there were over 6000 miles of streams in Georgia that were found to be impaired in 2006. These two numbers are related and should be described together. We also do not support the practice of water quality trading and ask that it be stricken from the end of paragraph (2) at the top right of page 18. Generally, the importance of protecting groundwater recharge areas should be highlighted in this section.</p>	<ul style="list-style-type: none"> • Pollutant allocation trading is among the management practices described in the draft plan that would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could achieve regulatory approval and active use within the context of a regional

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		<p>water plan. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory approval process, not by excluding such potential practices from the plan itself.</p> <ul style="list-style-type: none"> • In response to this and related comments, the December 5th draft has been revised to reference the state's program for protection of water supply watersheds and aquifer recharge areas.
<p>Steve Williams</p>	<p><i>10/30/2007 11:58:29 PM SECTION 11: WATER QUALITY MANAGEMENT PRACTICES</i></p> <p>Treat stormwater onsite through vegetated swales, pervious concrete and wetlands as a first treatment and infiltration.</p>	<p>This comment identifies additional practices for consideration during regional planning.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:50:03 AM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>We support the proposed new Significant Natural Resource Waters classification. However, we would like to see additional guidance to the Board of Natural Resources on the definition of this classification, the specific additional protections that will be afforded to waterways with the classification, and the process for nominating such waterways for the classification. We also encourage additional use of the existing Outstanding Natural Resource Water and Wild and Scenic River classifications, which have been underutilized historically. We would like more information on what is contemplated in connection with</p>	<p>The provision regarding Significant Natural Resource Waters has been revised to call for an assessment of need for the new water use classification. The questions raised here can be addressed in that process and subsequent rulemaking by the</p>

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	<p>“reviewing and updating” the bacteria and dissolved oxygen standards in policy paragraphs (3) and (4).</p>	<p>DNR Board, if that occurs. Similarly, Board rulemaking following adoption of the state water plan can provide a forum to address questions related to review and revision of the bacteria and dissolved oxygen water quality standards.</p>
<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:19:14 PM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>Section 12 Enhanced Water Quality Standards and Monitoring Practices This section recognizes the issues created with “impaired waters” due to many “one-size fits all” water quality standards, and is a very important discussion. The discussion of looking at the site- specific water quality conditions is on point. However, the provision to add yet another water quality designation should be eliminated, for two reasons: First, the current Georgia rules and EPA requirements provide for anti-degradation requirements in permitting any new or expanded discharge into a high quality water (i.e., one exceeding standards). Thus, the means to achieve the objective of this provision is already in place and redundancy is not necessary. EPD has enough to do to implement this Plan without unnecessary rulemaking. Secondly, if situations change and problems occur due to non-point source pollution that result in the lowering of water quality below the new standard, but still above the current standards, the stream is then “impaired” even if it is better than the current standards. Thus such higher standards create the same dilemma of “impairment” that the balance of this provision is attempting to solve. For these reasons, Policy Item (2) and Implementation Action (2) should be deleted in entirety.</p>	<p>The provision regarding Significant Natural Resource Waters has been revised to call for an evaluation of need for the new water use classification. The questions raised here can be addressed in that process and subsequent rulemaking by the DNR Board, if that occurs.</p>

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<p>Tanya Georgia Power</p>	<p><i>10/30/2007 2:41:15 PM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>Cost effectiveness and benefit considerations of policy and implementations: Throughout the plan a number of considerations are outlined for various policy and implementation actions. Cost effectiveness and benefits analyses are not always included in these considerations. Cost effectiveness and analysis of the benefits of proposed actions are crucial to assure limited funding is being spent on those actions that will gain the most results for overall water management. Solution: See Attachment I, Recommendations #4, #10 and #11. Additionally, a statement requiring such evaluation should be included for each policy and implementation practice.(Note - formatting does not transfer to the website. See filed comments for markup of section)</p>	<p>While the specific revisions recommended here were not all used, the language was revised in several places in response to this and related comments.</p>
<p>Steve Williams</p>	<p><i>10/30/2007 11:44:56 PM SECTION 12: ENHANCED WATER QUALITY STANDARDS AND MONITORING PRACTICES</i></p> <p>All streams should be monitored continuously through out the year on a regular basis as determined by scientist to create a realistic database.</p>	<p>Limitations on personnel and funding preclude the level of monitoring called for by this comment. The draft plan, however, does require development of a comprehensive resource assessment plan that will steps required to improve the current water quantity and quality monitoring network.</p>
<p>Julie Mayfield Georgia Water Coalition</p>	<p><i>10/30/2007 11:50:44 AM SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>The GWC believes that vigorous enforcement of existing laws is an obvious component of effective water management in all parts of Georgia. With regard to managing nonpoint source pollution, we agree that the actions in paragraph (1) of the implementation actions should be undertaken, with the exception of (1)(d).</p>	<ul style="list-style-type: none"> • This comment raises a number of issues and practices that can be addressed through different avenues following adoption of the

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	<p>We do not believe that self-monitoring and enforcement has any place in an effective water management system, particularly if those who will be monitoring themselves are also creating their own rules. In (1)(c), we believe that it is important for EPD to develop guidance for management of fertilizers for lawn use regardless of whether the watershed currently has a phosphorus-loading problem. Such guidance is applicable statewide, since fertilizers can harm otherwise healthy streams. In paragraph (2), it is unclear what EPD proposes to do after “evaluating” the actions listed in it. The GWC supports effective impervious area (EIA) limitations that are 10% or less, since waterways in watersheds with more than 10% EIA limitations begin to show harmful effects from increased runoff and pollutant loading. We also strongly support the use of vegetated riparian buffers as the best way to protect water quality, but we question which “innovative” programs EPD has in mind for protecting them. Some riparian property owners and local governments already ignore the existing laws and regulations pertaining to buffers, and EPD regularly grants variances to even the minimal buffer requirements. Enforcing existing buffer rules would provide at least as much benefit as finding “innovative” ways to appease recalcitrant property owners. With regard to the implementation actions for on-site sewage management systems, paragraphs (1) and (2) should be revised to transfer the authority over septage and septic tanks to EPD. If this requires a statutory change, we recommend that the Water Council ask for such a change in the 2008 General Assembly session. Finally, while the Coalition supports the use of watershed permitting as a way to enhance water quality protections, we strongly believe that the proposal for water quality trading should be deleted from the “New Tools” section. It represents an experimental and unproven technique for water quality protection that does not have a place in a statewide water management plan. In particular, water quality trading can result in hotspots and has not been shown to improve water quality in any watershed in the United States.</p>	<p>state water plan: EPD’s implementation activities, DNR Board rulemaking, and/or regional planning.</p> <ul style="list-style-type: none"> • Other comments would require statutory change and so, are beyond the scope of the state water plan. • The December 5th draft has been revised in response to the comment re: paragraph (2) in the implementation actions under managing nonpoint source pollution. • See responses to the GWC’s earlier comments re: pollutant allocation trading.
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<p>Ian Lundberg Resolve Environmental Engineering, Inc.</p>	<p><i>10/30/2007 SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>In the "Improving Compliance" section, much of the discussion focuses on incentives for regulated entities with a significant record of long-term superior environmental performance. I believe this is an excellent and valuable suggestion, and perhaps the best way to encourage continuous permit compliance and pollutant removal beyond the requirements of the permit. Unfortunately, the Implementation Actions appear to abandon this worthy idea and return to "enhanced implementation". The carrot generally works better than the stick, and the discussion recognizes this, but in the end all that appears to be recommended is a bigger stick. I hope the opportunity for innovative incentive programs is not overlooked in this plan. With regard to water quality trading, this is a valuable potential tool. Procedures for trading have been established and tested by EPA, and these ensure there are no "hot spots", but that overall and in each stream segment water quality is maintained or improved. I do not believe that a potential tool should be left out of this plan based upon unfounded concerns that have already been addressed by EPA rules and guidance.</p>	<p>The first part of the comment concerns implementation activities to be undertaken after adoption of the state water plan. The second concerns provisions regarding pollutant allocation trading; these provisions have not been revised.</p>
<p>Steve Williams</p>	<p><i>10/30/2007 11:45:41 PM SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>Local utilities need to do a better job enforcing their laws on erosion as well as research new technologies on erosion control. Local utilities need to research storm water cleaning technologies and MAINTAIN them properly to keep trash and debris out of the sewers. On site treatment BMP's of stormwater using biomimicry techniques such as swales and pervious concrete should be promoted and rewarded. Stormwater utilities should be implemented statewide based on the local environmental issues and geology. Remove exemptions for farm, mining and foresting practices for E & S controls and water usage.</p>	<p>This comment highlights several practices that can be considered in regional planning. It also suggests actions that would require statutory change and so, are beyond the scope of the state water plan.</p>

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<p>Joe Cook Coosa River Basin Initiative</p>	<p><i>10/31/2007 SECTION 13: ENHANCED POLLUTION MANAGEMENT PRACTICES</i></p> <p>I would recommend that the section on Potential New Tools for Pollution Management be struck from the plan all together. Water quality trading is not currently a viable option for protecting water quality in Georgia because of our lack of funding for water quality monitoring. To insure that nutrient trades are working, extensive water quality monitoring is essential. Currently, our state lacks the funding and resources to conduct such monitoring. Furthermore, in areas of the Upper Coosa River Basin where nutrient trading is already taking place, the manner in which it is taking place leads me to believe that this system will be abused by private companies to extort money from public water providers. Based on our experiences here, EPD should step very, very, very cautiously into the world of nutrient or water quality trading.</p>	<p>Pollutant allocation trading and watershed permitting are among the water management practices described in the draft plan would require further definition, investigation, and regulatory approval prior to implementation. These practices, if not prohibited by Georgia law, should not be excluded from the plan because additional definition and investigation might be required before they could achieve regulatory approval and active use within the context of a regional water plan. If there are impediments to use of these practices, the proper place for these issues to surface and to be challenged is in the regulatory approval process, not by excluding such potential practices from the plan itself.</p>
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<p>james scarbrough gwinnett water resources</p>	<p><i>9/28/2007 10:36:38 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>This section should be a concise compilation of policy statements and directions to the Board of Natural Resources on rule and guidance development to be used to implement the policies. The existing second draft of the plan has much more detail than is needed and these details should be in rules. Planning Councils: Local government elected officials and their staff must be major players in the development of the plans because these are the people who will have to implement the plans and their rate payers and citizens will have to pay for the plan implementation.</p>	<ul style="list-style-type: none"> • As noted above, the Water Council has chosen a different approach, providing additional detail so the intent and potential implications are clearer than would be provided in a document limited to background and policy statements. The current draft, however, recognizes Board rule making authority and proposes the specifics for consideration by the DNR Board. • The provisions regarding water planning councils have been revised to specify an process for appointment by the Governor, Lt. Governor, or Speaker. Revisions also state that each council will be broadly representative of water-related interests, with representation tailored to reflect the differing economic and resource needs in differing regions.
<p>wilbert</p>	<p><i>10/9/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their oportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	<p>Repeated comment: See above for response.</p>

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<p>James H. Newsome Warren County Board of Education</p>	<p><i>10/19/2007 6:11:54 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I have followed the water woes of the state and I am aware that an effort was made a few years ago in the General Assembly to allow inter-basin transfer of water. If this legislation had passed, overdeveloped areas such as Atlanta could have tapped into the water resources across the state and piped water into the metro area. Now that we are in the midst of an historic drought the upcoming state water plan will be debated in this year's General Assembly. At stake will be Rural Georgia fighting to protect our limited water resources against efforts from the metro's strong group of legislators who feel they must have more water to sustain growth. Today there are already two Georgias and if Rural Georgia loses this fight unrestricted growth will continue at the expense of what's left of our rural landscape, and our future growth will be greatly restricted. Historically, across this state and nation, development of communities has been directly related to an available water supply. Metropolitan areas do not have a God-given right to infringe on the water supply of agricultural areas no more than those agricultural or rural areas have a right to demand a part of a metropolitan area's natural resources. It is time for development in areas of our state other than Atlanta. It is time for Atlanta to manage and develop conservation resources to stretch their water supply if they want a future. If development doesn't like the picture in Atlanta, then let them look to other areas of our vast state for sites to develop. Rural Georgia is ready for some growth of our own. I encourage you to develop a plan that will allow Rural Georgia counties to strongly protect the water resources that are part of our communities. James Newsome 98 Buena Vista Avenue Warrenton, Georgia 30828 706-465-2693 home 706-414-1180 cell</p>	<ul style="list-style-type: none"> • The Water Council considered revisions to the 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. • • The resource assessments and regional water plans proposed in the plan will provide information on water availability, and will to inform local decisions about growth and development.
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<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Matt Blum</p>	<p><i>10/20/2007 10:14:49 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>I think we need to look at desalination. They are very successful with this process in the middle east. We have the Atlantic Ocean off to the east. Lets take advantage of this resource!!</p>	<p>Desalination is referenced in the plan as practice that may help meet Georgia's long-term water needs, and may be considered for inclusion in regional water development and conservation plans.</p>

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<p>Kellie Bowen</p>	<p><i>10/21/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The drought is sadly the last straw that broke the camels back. Unbridled growth in the entire state, especially Atlanta, was not matched by adequate water supply. Water authorities and managers cannot allow explosive growth and alarming numbers of water meters to be hooked up to the system without having the supply to handle the demand. Drought conditions should be planned for and that lack of planning is nothing more than rolling the dice and hoping there won't be a drought or any other situation for that matter that will cause a crisis such as the one we are facing right now. Lake Lanier is not growing and even if there was adequate rainfall the lake cannot keep up with the growing demand. There has been a collective failure at all levels of government agencies that allowed the entire state to end up in this crisis. Our livelihoods are at stake, our economy is at stake, and our environment is at stake all because of poor planning and the lack of foresight to plan for a drought. Effective water conservation is not achieved by ordering a total water ban that puts Georgians in the Urban Agriculture Industry out of business while failing to address other industries and businesses that consume huge quantities of water. Urban Agriculture is responsible for \$8 billion in sales yearly and a total water ban is nothing more than a band aid that is unable to heal the wound called "a water crisis". My message that everyone must not ever forget is that poor planning and unbridled growth is the root of the crisis. The drought is merely a symptom of the total failure of the state to be prepared for any situation that could threaten all Georgians.</p>	<p>Repeated comment: See above for response.</p>
<p>A. Caldwell</p>	<p><i>10/24/2007 10:53:57 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The EPD-designated water planning councils should serve as stakeholder advisers. The actual plans should be written by Natural Resource professionals that would manage resources for sustainability instead of short-term gain. Strong leadership based on the resource and not a politicians re-election or the greed of large corporations that will leave the area once resources are depleted. The "Tragedy of the Commons" (i.e., the status quo) will continue as long those planning resource use have a vested interest in short-term gains at the expense of</p>	<p>The intent is that regional water development and conservation plans will be prepared by water resource professionals in concert with regional leaders from multiple sectors. Plans will also follow guidance from EPD, including the assessments of</p>

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	long-term sustainability. EPD is unfortunately headed by political appointees with incentives to continue the status quo.	resource capacities outlined in Section 6 of the draft plan.
Sara Barczak Southern Alliance for Clean Energy	<p><i>10/29/2007 5:37:39 PM 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.</p>	Revisions to the December 5 th draft include links to the State Energy Strategy in the guiding policy statements and in the provisions for regional planning.
Julie Mayfield Georgia Water Coalition	<p><i>10/30/2007 11:51:29 AM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Regional water planning will be a crucial part of the implementation of any statewide water management plan, and the GWC generally supports the proposals here. Regional planning will require significant funding from the Georgia General Assembly, which the GWC will be working to secure. The Water Council should also advocate for this funding. Statewide water management policies will be largely meaningless without taking the next step to organize and implement regional planning. The GWC agrees that each region of Georgia is different and that no one-size-fits-all policy is appropriate for many aspects of water management. We note some confusion between the charge to the Board of Natural Resource to develop rules pertaining to regional planning in paragraph (1) of the implementation actions, and the rest of the implementation action paragraphs which require action from the EPD Director. If it is the Water Council’s intent that paragraphs (3)-(8) be reflected in the rules passed by the Board, this intent needs to be made clear. In Paragraph (3)(a) of the implementation actions, the plan should delete “county-based” as a qualifier for</p>	<ul style="list-style-type: none"> • In the December 5th draft, this section has been revised to define the state service delivery regions as regional planning areas, with the exception of counties that are part of the Metro District. That is the only exception provided the Metro District, and additional language has been added or revised to clarify the plan’s applicability to the Metro District, including the 2008 revisions of the District’s plans. • Rulemaking by the Board of Natural Resources, following

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	<p>water planning regions, since the term's definition addresses the boundaries. The GWC has an ongoing concern about the draft plan's treatment of the MNGWPD. Paragraph (6)(d) of the implementation actions appears to explicitly exempt the current 2008 revision of the District's plans from being subject to any part of the statewide water plan. If that is not the intent, then this language should be clarified. Furthermore, as to future District plan revisions, this paragraph states only that "guidance" for the District will be "similar " to that provided to other planning regions, without defining what that means. The plan should be clear that the guidance developed pursuant to the statewide plan should apply to the District in the same way it does to the other regional water planning areas. Although EPD has already added new language on this point, that language continues to sow confusion about how the District relates to the plan. The statewide water plan must unite Georgia, not divide it. The plan should also address how other regional water planning efforts, such as the Lower Flint management plan and the coastal management plan, will be integrated into the regional planning process and subject to the new policies.</p>	<p>adoption of the state water plan, will provide an arena in which to address other issues raised here.</p> <ul style="list-style-type: none"> • The plans for the lower Flint and for the coast are not comprehensive regional plans. In preparation of water development and conservation plans, these plans will certainly have to be considered, along with existing local and multi-jurisdictional water or wastewater plans. The regional plans proposed in the draft state plan, however, are intended to be the comprehensive plans whose provisions will guide EPD permitting, once the regional plans are adopted.
<p>Virginia Holton Packaging Corporation of America</p>	<p><i>10/30/2007 12:19:57 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Section 14 Regional Water Planning There is a glaring omission in the make-up of the Water Planning Councils, and that is omission of the regulated community as participants in WPC activity in all of the various discussions. For example, as noted earlier in comments for Section 8, the overall lack of understanding of industrial processes is very apparent in the Water Plan, and without that kind of knowledge, the planning process will be fatally flawed. The regulated community also includes the municipal water providers and treatment plant operators, businesses, industrial and agricultural interests, local governments and community representatives. This is where the knowledge about water needs, plans for growth, and current and future capabilities to provide adequate water resides, and they must be integral part of the planning process as members of the</p>	<ul style="list-style-type: none"> • The December 5th draft includes more detail on the proposed process for nomination and appointment of members of the regional water planning councils. That language calls for the councils to be broadly representative, with specific references to industry and local governments, among the members of the regulated community who

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	<p>various Water Planning Councils. Another major flaw is the current plan for yearly review process. This is overly ambitious and totally unnecessary as a general rule. In locations where there is already a severe water supply problem such as the Coastal Counties or the metro-Atlanta area, more frequent assessments may be needed until the situation is under control, but a five –year review cycle is far more reasonable and workable as the normal cycle. And lastly, Water Planning Councils meetings and decisions must be transparent and open. Meetings should be open to the public with proper notice of impending milestones and decision points; policies and procedures that will become binding Memorandum of Agreement must be public information prior to the WPC commitment with opportunity for public input, and any decision on adoption of regional water development and conservation plans should have a minimum public notice of 45 days to allow public review and comment. Any specific regulatory requirements for the regulated community that may come out of the plan must be adopted by DNR through EPD. Otherwise, the WPC will usurp rulemaking authority that rightly belongs to EPD along with the due process that comes with the rulemaking process.</p>	<p>are to be represented.</p> <ul style="list-style-type: none"> • Language has been added to clarify the process for review and revision of the regional plans on a five-year cycle. • Language has been added to specify additional public review and comment steps during preparation and review of water development and conservation plans.
<p>Glenn Page Cobb County-Marietta Water Authority</p>	<p><i>10/30/2007 5:21:19 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>Care will need to be taken by EPD to ensure that "competition" for water resources is minimized between the established regions. In other words, EPD will have to balance the competing interests between the water planning councils.</p>	<p>Language has been added to the December 5th draft to emphasize EPD's role in coordinated water planning between different water planning councils.</p>
<p>Estelle Ford Williamson</p>	<p><i>10/30/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>If this plan as outlined were to be successful, then it would be clear that the model of the Metropolitan North Georgia Water Planning District has worked. It has not. We are in the middle of a very serious drought right now that threaten's the Region's drinking water, not to mention water for commerce. There needs to be a water AUTHORITY, and there need to be policies set and met, such as requiring recycling gray water for personal use for lawn and garden maintenance,</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>

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	including vegetable gardens. This is just a start. There needs to be a statewide policymaking board that has input but not veto power on the local level. The time for planning alone is over; we've got to start using strong conservation policies for which there are penalties for noncompliance.	
Steve Williams	<p><i>10/30/2007 11:42:51 PM SECTION 14: REGIONAL WATER PLANNING</i></p> <p>One way to help deal with the problems is to start looking at geographic boundary for political boundaries instead political gerrymandering as currently practiced. The first measure would be to change the US and State Representative boundaries and make them more reflective of the states environment. Next would be to start funding education and advertising water conservation methods and programs by providing a line item of a small percentage (1-3% \$\$\$ after researching a realistic amount for this) of each project into a fund specifically for water issues and spend on a district wide area in all media. Cheeping out is a waste of money. The problem has been neglected for years and the governor has done no better in setting an example by underfunding this plan as well. All promotions promoting growth on a state and local level should have a percentage used for solving the growth problems, i.e. Brand Atlanta Another concept would be to have water management regulations should be decided on and implemented geographic district level instead of through political districts.</p>	This comment does not clearly suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.
Crista Carrell GACDS	<p><i>10/31/2007 SECTION 14: REGIONAL WATER PLANNING</i></p> <p>The Georgia Association of Conservation District Supervisors (GACDS) recommends the appointment of soil and water conservation district supervisors to the regional water planning councils. For seventy years, conservation district supervisors have worked to protect Georgia's natural resources through local involvement and education. We ask that EPD consider the supervisors' expertise in natural resource management as the regional councils are created.</p>	The provisions regarding water planning councils have been revised to specify an nomination and appointment process. Revisions also state that each council will be broadly representative of water-related interests, with representation tailored to reflect the differing economic and resource needs in differing regions. It is expected

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		that district supervisors would be among the nominees that would be considered for appointment.
Stephen Loftin Regional Business Coalition of Metro Atlanta	<i>10/31/2007 SECTION 14: REGIONAL WATER PLANNING</i> In Implementation Actions: Item (5)(e), add a sentence to read “However, any water planning pursuant to this section that would impact those counties lying within the Metropolitan North Georgia Water Planning District shall be consistent with the Metropolitan North Georgia Water Planning District Act O.C.G.A. 12-5-570 et seq.” Item (7)(b), delete “state’s” and insert “regions”. Also, add “or through supplementation” after “within the water resources’ capabilities.” Item (7), add a new paragraph (d) to read as follows: “Plans developed by the Metropolitan North Georgia Water Planning District shall be consistent with the Metropolitan North Georgia Water Planning District Act, O.C.G.A. 12-5-570 et seq.”	<ul style="list-style-type: none"> • Paragraphs 1-5 in the implementation actions have been substantially revised, which partially addresses this comment. • Other elements of the comment raise issues that may be considered in rulemaking by the Board of Natural Resources or in development of guidance for regional planning, following adoption of the state water plan.
Vernon R. Harris Bear Mountain Scientific	<i>11/5/2007 SECTION 14: REGIONAL WATER PLANNING</i> Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.	Repeated comment: See above for response.
Brenda Rashleigh	<i>10/12/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i> It is unclear how the new policies and rules contained in the draft plan will apply to the Metro North Georgia Water Planning District. The new policies and rules contained in the statewide plan, including those on water conservation, inter basin transfers and reservoirs, should apply to the 2008 and all future revisions for the Metro District, so that the Metro District does not plan according to different, much less stringent rules than the rest of the state will follow.	<ul style="list-style-type: none"> • In the December 5th draft, this section has been revised to define the state service delivery regions as regional planning areas, with the exception of counties that are part of the Metro District. That is the only exception provided the Metro District, and additional

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		language has been added or revised to clarify the plan's applicability to the Metro District, including the 2008 revisions of the District's plans.
Paula D. Minor	<p><i>10/17/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>In another posting the poster wrote about a using a pipeline to get water from Tennessee. Why couldn't we build a pipeline and a desalinating plant from the Savannah area and pump water from the Atlantic Ocean to the Atlanta area to serve all of GA? Of courses this will not help us today or in the near future, however it will help for future use and the continued growth of the state.</p>	Desalination is referenced in the plan as practice that may help meet Georgia's long-term water needs, and may be considered for inclusion in regional water development and conservation plans.
Rae Sikora	<p><i>10/19/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	Repeated comment: See above for response.

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<p>Eddie Brock</p>	<p><i>10/23/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>Very, very important that water transferred through interbasin transfers be returned to the point of origin!--not just the basin of origin. Thanks for the opportunity to comment.</p>	<p>The Water Council considered revisions to the 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>
<p>Bryan Hager</p>	<p><i>10/30/2007 10:21:25 AM IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>While watershed based planning is very important it must be integrated into the state mandated comprehensive planning process. The comprehensive planning process is the means by which local governments and regional agencies resolve conflicts between resources and demands, different agencies and varied community values and goals. There is totally inadequate coordination between this water planning process and the local and regional comprehensive planning process. This watershed planning process will put a great burden on small local governments, especially ones that include more than one water planning area. The plan must provide technical and financial resources to enable small local governments to effectively participate. The failure of the state government to complete its part of the comprehensive planning process (coordination of regional plans, adoption of state goals and direction of state investments) should not place additional burdens on local governments to comply with new state mandates.</p>	<ul style="list-style-type: none"> • Georgia's comprehensive planning process is administered by the Department of Community Affairs (DCA). Following adoption of the final statewide water plan, DCA intends to revise its planning guidance to address coordination with the statewide water plan and regional water development and conservation plans. Those revisions will ensure that future updates of regional and local government comprehensive plans will be consistent with and supportive of statewide and regional water planning provisions. • The comment also raises issues that will have to be addressed

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		during implementation of the statewide water plan.
Stephen Loftin Regional Business Coalition of Metro Atlanta	<p><i>10/31/2007 IMPLEMENTATION OF REGIONAL WATER PLANNING</i></p> <p>The sixth paragraph, the first sentence, add “and economic interconnections” to the end of the sentence. This is consistent with the language included in item (3)(a) of the Implementation Actions of Section 14 - Regional Water Planning. Also, for consistency, in paragraph seven, the last line should read “EPD will also consider existing infrastructure, surface groundwater interactions, the extent of the geographic area that may impact a water source, common economic interests, and other factors.” The eighth paragraph, the last sentence, delete “most affects” and insert “relies on most.” The tenth paragraph, add a sentence to read “However, any water planning pursuant to this section that would impact those counties lying within the Metropolitan North Georgia Water Planning District shall be consistent with the Metropolitan North Georgia Water Planning District Act O.C.G.A. 12-5-570 et seq.”</p>	In the December 5 th draft, the regional planning material has been revised to define boundaries for regional planning and to detail a process for nomination and appointment of members of the Water Planning Councils. Revisions further clarify applicability of the plan to the Metropolitan North Georgia Water Planning District, as consistent with the District’s enabling legislation.
wilbert	<p><i>10/9/2007 ASSESSMENT OF RESOURCE CAPACITY</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their opportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	Repeated comment: See above for response.
Rae Sikora	<p><i>10/19/2007 ASSESSMENT OF RESOURCE CAPACITY</i></p> <p>I would like two areas to be addressed in the water planning for this region. When</p>	Repeated comment: See above for

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	<p>we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>response.</p>
<p>Genevieve L. Frazier voter and resident of Georgia</p>	<p><i>10/19/2007 ASSESSMENT OF RESOURCE CAPACITY</i></p> <p>Preference should not be given to Atlanta simply because of its population. Atlanta historical and even today poorly manages the Chattahooche River (it is filthy) and does not force conservation of water. North Georgia should stop being forced to suffer because Atlanta does not control its growth; water consumption nor the quality of its water and rivers. NORTH GEORGIA SHOULD BE PROVIDED THE AUTONOMY TO PREVENT ATLANTA FROM TAKING ITS WATER WHEN ATLANTA IS NOT FORCED TO RETURN IT TO THE ETOWAH; NOR TO CONSERVE; NOR TO CLEAN IT.</p>	<p>This comment raises a number of issues to be considered in preparation of regional water development and conservation plans.</p>
<p>Kevin Colburn American Whitewater</p>	<p><i>10/30/2007 3:47:17 PM ASSESSMENT OF RESOURCE CAPACITY</i></p> <p>Hydrologic models cannot predict recreational flow needs. The accepted methodology for determining recreational instream flow needs is described in detail in "Flows and Recreation: A Guide to Studies for River Professionals," by Doug Whittaker, Bo Shelby, and John Gangemi. You can learn more about this publication and download or request a copy at: http://www.hydroreform.org/hydroguide/recreationalflows The definition of resource capacity must include the capacity of a river to support boating, fishing, and other warer based recreation.</p>	<p>The issue of flows needed to support recreation, like other uses, will be addressed partly through the resource assessments described in Section 6 and partly through regional planning. Water quantity resource assessments will be based in part of flow targets that will presumptively support a range of historical uses, including recreation. Regional water plans,</p>

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		then, will provide an opportunity for additional provisions addressing the water users and uses specific to individual regions.
Robert B. O'Neill	<p><i>10/30/2007 8:32:19 PM ASSESSMENT OF RESOURCE CAPACITY</i></p> <p>Immediate implementation of this legislation is critical. As a State we must take ownership for our actions to prepare or not to prepare for draught situations like we currently find ourselves in. We must MANAGE growth, not stop it but MANAGE it. Water usage needs to be part of the equation involved in a developer's initial proposal for approval. In good rainfall times the impact seems minimal, however, in low rainfall times it brings the problem to a head sooner due to the increased usage of a lesser supply. Canton in the Hickory Log Creek Reservoir project should be praised for having foresight and taking the action to do something about it. ACTION speaks louder than words. Politics has no place in this matter, we need to do what needs to be done and do it now. Thank you for listening to my comments.</p>	This comment does not suggest a specific revision that is within the scope of the statewide plan, and no action was taken as a result.
wilbert	<p><i>10/9/2007 WATER PLANNING COUNCILS</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their opportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	Repeated comment: See above for response.
sheila mccoey	<p><i>10/18/2007 WATER PLANNING COUNCILS</i></p> <p>Water planning councils need to include diverse interests, not only urban but also rural, especially farmers. Politics must not decide water policies or we will be stewards with nothing to manage--too corrupt to manage for ourselves or our</p>	<ul style="list-style-type: none"> • The regional planning section of the plan specifies diverse representation on the water planning councils, including

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	<p>children's future. Also, is there a need to include some provision for security/supervision of water resources, especially in terms of raw water catchment sites, etc. or perhaps that already is addressed in law-enforcement policies? or, best-case scenario, will that not be an issue? thanks for your time, sheila mccoey</p>	<p>agriculture. • The statewide plan builds on the framework of Georgia's current state water management programs. As such, the provisions of the plan supplement many ongoing programs that are not explicitly addressed, including water security programs.</p>
<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 WATER PLANNING COUNCILS</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 WATER PLANNING COUNCILS</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>

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<p>Bryan Tolar Georgia Agribusiness Council</p>	<p><i>10/29/2007 3:55:22 PM WATER PLANNING COUNCILS</i></p> <p>We applaud the interest in providing balance to the formation of the regional water councils. Such balance must also be shared with the economic reality that agriculture represents Georgia's largest industry and that such economic and environmental interest should ensure that agriculture representatives serve on all regional water councils and planning committees.</p>	<p>While the provisions regarding water planning councils have been revised they still state that each council will be broadly representative of water-related interests, with representation tailored to reflect the differing economic and resource needs in differing regions.</p>
<p>Steve Williams</p>	<p><i>10/30/2007 11:49:31 PM WATER PLANNING COUNCILS</i></p> <p>Include regular meetings with adjoining states on common basins</p>	<p>Language regarding coordination with neighboring states has been added to the December 5th draft.</p>
<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 WATER PLANNING COUNCILS</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>Repeated comment: See above for response.</p>
<p>wilbert</p>	<p><i>10/9/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their opportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	<p>Repeated comment: See above for response.</p>

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<p>JC Corcoran Simply Enough</p>	<p><i>10/19/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Animal Agriculture places THE largest demand on water resources and is THE number one contributor to water pollution. How can you implement a water plan that leaves Animal Agriculture out??? We have to reduce the enormous subsidies to this industry or tax these largely unhealthy commodities! Only when animal products carry their fair share of the burden of water use and pollution WILL cleaner and more abundant water be available and obesity and incidences of chronic disease WILL be reduced. It is truly a WIN - WIN situation!</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>STEVEN ROBERTS</p>	<p><i>10/26/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>I am employed by the green industry and it angers me that the media places a bulk of the blame on landscapers and outdoor water usage. Do you know who is being punished and not being able to use water - landscapers - the very same people who are preventing erosion, introducing new vegetation to barren developed land, and ultimately helping the environment more than any other industry in agriculture. Outdoor water use only accounts for 20% of all water usage (on an annualized basis). Not to mention, this industry has suffered while pressure washing companies, car washes, and other industry has not been banned</p>	<p>The comprehensive statewide water plan is intended to guide long-term planning for Georgia's water resources and is not intended to guide responses to extreme conditions, like drought or the emergency circumstances that may result. The comprehensive statewide water plan will be</p>

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	<p>from using water. So if we are going to conserve water the playing field needs to be leveled. Residential water use only accounts for 50% of total water use, we need to make the large industries that do not produce a food commodity change the way they do things - voluntary cutbacks are not going to work, if you think they will you need to wake up.</p>	<p>implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide responses to drought or other emergency circumstances.</p>
<p>Bryan Hager</p>	<p><i>10/30/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>This planing process makes no mention of the state mandated comprehensive planning process. Comprehensive plans are required to look at these same issues though not in the same detail that may be required in this process. The water planning process should compliment the comprehensive planning process, not replace it. The other fundamental flaw in this section is that it is population driven. There are some areas of the state that we should be steering people away from whehter for watershed protection or other environmental reasons, because the local populace doesn't want change or because of the total lack of infrastrucutre to support additional people. Past trends in population are not accurate predictors of the future, and as a sentient species you would think that we would want to guide our future not just react to it. The water planning sections should be totally rewritten to better dovetail with the comprehensive planning process and to factor in resource contraits and community goals for population projections and water use demand.</p>	<ul style="list-style-type: none"> • Coordination with the comprehensive planning process is addressed to the extent possible under current statutes in <i>Section 13: Enhanced Pollution Management Practices</i>. The Department of Community Affairs also intends to revise its planning guidance to address coordination with the statewide water plan following its adoption. • The resource assessments and regional water plans proposed in the plan will provide information on water availability, and will to inform local decisions about growth and development.

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<p>Paul Petersen</p>	<p><i>10/30/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>There are several undeniable truths in life. One is: "Excrement runs downhill." Another is "Pvote with their wallets and their feet." The water plan will show another truism. People will concerve water at home by stopping washing clothes in their home washer and taking their laundry to the local laundromat. When the laundromat uses up its allocation of water, it's loyal customer base who have no washers and dryers at home will have no place to do their laundry. It will beome a stinking mess.</p>	<p>This comment does not suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.</p>
<p>Marnie Paul</p>	<p><i>10/30/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>We need to put a moratorium on new development until we know the carrying capacity of our water resources. The legislature should require that all old houses have low-flo plumbing as a condition of sale. Cities must be forced to put in sewer systems, with State aid. All owners using well water should fall under the same restrictions and regulations as those using public sources. Sprinkler systems should be banned from use by individual homeowners. Make it legal to install gray water systems and provide incentives for people to do so. Have some State agency help businesses develop water saving and "green" techniques. Illinois does some of this and businesses save money. Make regulations Statewide rather than by county or city. Greatly increase water rates for big users and apply those savings to habitat conservation. We need permanent longt-term solutions not just more reservoirs. Stop pressuring Washington for an exemption from the Endangered Species Act. Any change would set a dangerous precedent.</p>	<ul style="list-style-type: none"> • The resource assessments and regional water plans proposed in the plan will provide information on water availability, and will inform local decisions about growth and development. Placing a moratorium on development is beyond the statutory authority and scope of the statewide plan. • The December 5th draft has been revised to include provisions regarding consideration of grey water use as an element in water conservation in the municipal and industrial sectors and to reference DNR technical assistance with water conservation. • The comment suggests several other actions that are beyond the statutory authority and scope of the statewide plan.

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Estelle Ford-Williamson	<p><i>10/30/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Again, if we depend on the process used for the Metropolitan North Georgia Planning District to solve the problem of developing water resources, we will be following a failed model. We are in a water crisis, and leadership needs to come forward to take a more serious approach. The Western states have such authorities; they know they have a water problem. Much of this report shows ongoing denial of the problems we have.</p>	This comment does not clearly suggest a revision that is within the scope of the statewide plan, and no action was taken as a result.
Steve Williams	<p><i>10/31/2007 12:00:10 AM WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Implementation through state minimum requirements and incentives.</p>	This statement of principle is generally consistent with the approach taken in the current draft.
Ben Gandy Scapes, LLC	<p><i>10/31/2007 2:02:45 PM WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Create plumbing standards that allow for the recapture of gray water for non-potable water use, such as landscape irrigation. Initiate tax incentives for developers who invest in water reclamation construction practices.</p>	The December 5 th draft has been revised to include provisions regarding consideration of grey water use as an element in water conservation in the municipal and industrial sectors, and to highlight reuse (i.e., use of reclaimed water) as a practice to consider in regional planning.

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<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 WATER DEVELOPMENT AND CONSERVATION PLANS</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>Repeated comment: See above for response.</p>
<p>Rae Sikora</p>	<p><i>10/19/2007 INFORMATION NEEDS, TIMETABLE, AND BUDGET DEVELOPMENT</i></p> <p>I would like two areas to be addressed in the water planning for this region. When we built our home here in Georgia recently, we were told we could not pass inspection if we had a grey water system. Not only should each home be allowed to have a grey water system, but it should be mandatory to have a system and use it for all outdoor watering. There should also be more education on water catchment systems for collecting and storing water from rooftops. Secondly, I do not see animal agriculture addressed anywhere in the plan. Animal agriculture is not only using more water than residential areas, but the waste and runoff coming from animal agriculture facilities is polluting our precious water resources. Animal agriculture is also the number one cause of global warming and is a luxury we can no longer afford to support.</p>	<p>Repeated comment: See above for response.</p>
<p>Don Cope Dalton Utilities</p>	<p><i>10/30/2007 5:45:42 PM INFORMATION NEEDS, TIMETABLE, AND BUDGET DEVELOPMENT</i></p> <p>(3rd paragraph) Water resource assessments, to be initiated in 2008, will provide an opportunity to build on and improve the available information. These assessments will also require periodic updates, allowing incorporation of additional data and information for areas where the current information base has gaps or weaknesses. Additional information will be needed to refine foursix types of analysis: forecasts of water and wastewater needs, water quantity resource assessments for surface water sources, water quality resource assessments for</p>	<p>The comment calls for an increased emphasis on augmentation of water supply. This issue will be addressed in regional planning, based on the water quantity resource assessments and forecasts of future</p>

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	<p>water produced by desalination of sea water and water quality resources assessments for water produced from augmentation from the Tennessee River, water quantity resource assessments for groundwater sources, and water quality resource assessments. (4th paragraph) A comprehensive monitoring plan will be needed to address generally acknowledged weaknesses in the information base available for these analyses. One weakness is the paucity of information on the quality of waters throughout Georgia. Assessing the future assimilative capacities of our streamwater resources, and designing management practices that will allow sustainable use of those capacities, will depend largely upon collecting the data needed to characterize stream conditions. A second weakness is a lack of information on surface water flows, groundwater levels, and the water use that these can support in a sustainable manner. These weaknesses can be partially addressed by establishing a more comprehensive statewide network of surface water and groundwater monitoring stations. More monitoring sites are needed to ensure the data are available to assess the capabilities of water resources, and to assess the impact that increased use in some areas might have on those who share the resource.</p>	<p>demand. For those regions that do not have sufficient water supply, resources that have not historically been used for water supply should be investigated during preparation of regional water development and conservation plans. To support this aspect of regional planning, the December 5th draft has been revised to more clearly define a state role in provision of financial and technical support for multi-jurisdictional water supply projects identified in water development and conservation plans.</p>
<p>Nina Lovel Coosa Valley Technical College</p>	<p><i>10/30/2007 INFORMATION NEEDS, TIMETABLE, AND BUDGET DEVELOPMENT</i></p> <p>Clearly, the success of this planning process and its implementation depends on thorough, accurate and ongoing information collection and analysis. The cost of this information must be planned and provided for by annual appropriations from the General Assembly of at least \$10 million per year for three years. This need, including the dollar amount, should be specifically requested in the plan</p>	<p>Language regarding state funding has been added to the December 5th draft (at the end of the section titled <i>Implementation of Regional Planning</i>). This language addresses funding over multiple years, however, and as a result, does not include specific figures.</p>
<p>Vernon R. Harris Bear Mountain Scientific</p>	<p><i>11/5/2007 INFORMATION NEEDS, TIMETABLE, AND BUDGET DEVELOPMENT</i></p> <p>Please visit the NASA web site below and view the last invention submission entry on the page. The invention could have a major impact on drinking water consumption.</p>	<p>Repeated comment: See above for response.</p>

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<p>Arlene</p>	<p><i>10/8/2007 ACKNOWLEDGEMENTS</i></p> <p>The first part of of any fair plan of depriving water to residents, would be to stop the issuing of permits to build new homes that would need the water we are using. The more homes that are built the less water there will be for the residents who already live here.</p>	<p>The resource assessments and regional water plans proposed in the plan will provide information on water availability, and can inform local decisions about growth and development. Placing limits on permits for new homes is beyond the statutory authority and scope of the statewide plan.</p>
<p>wilbert</p>	<p><i>10/9/2007 ACKNOWLEDGEMENTS</i></p> <p>Among these august people who helped with the writing and implementation of these ideas, hopefully there are many who will see that "business as usual" as defined by golf courses and resorts, construction and landscapers, cannot be allowed to continue. Even the City of Atlanta has turned off the spigots for the huge tourist attraction of the dancing waters in Centennial Oark, in deference to the shortage and extreme drought facing us currently. Please read my comment, and help us "civilians" use what water we have to save what we already have....the trees of Georgia. Golf courses and landscapers are nonvalid users of Georgia's precious water. Not only are they abusing their oportunity to drench their acres of greens and newly-installed sod, the run-off from their use of chemicals continues to pollute our streams and waterways. Please include NO exemptions for them on watering bans.</p>	<p>The comprehensive statewide water plan is intended to guide long-term planning for Georgia's water resources and is not intended to guide responses to extreme conditions, like drought or the emergency circumstances that may result. The comprehensive statewide water plan will be implemented in conjunction with the State Drought Management Plan, the Flint River Drought Protection Act, and other statutes and regulations that guide responses to drought or other emergency circumstances.</p>