

SECTION 7.4

RECOMMENDATION: Delete the 3rd (full) bullet point on page 7-18

- The inclusion of this bullet point was an error.
- It is the old version of the bullet point directly above it.
- The Council voted to change the language of this bullet point to the language provided in the 2nd (full) bullet point on the page at CM10.

SECTION 6 – DM2 (see page 22 of packet)

EPD: Page 6-4, DM2, and subsequent references to DM2: The current wording of DM6 is not consistent with current state law, which obligates the Director to require involuntary suspension of irrigation under certain circumstances. Consider revising to read “primarily through voluntary means” or other wording that reflects the Council’s intent but is consistent with state law.

RECOMMENDATION: Suggest to Council to move this management practice to the Recommendations to the State section since it is a recommendation for modification of current policy, which does allow for involuntary suspension. While implementation of the recommendation would not require a statutory change, it does set preferences for how current law and policy are implemented (e.g., avoid involuntary suspension).

CONSERVATION (see pages 23 & 24 of packet)

RESPONSE:

- Specific conservation practices are clearly listed in the description column of Table 6-1 for Management Practices **DM3, DM5, DM6, and DM7**.
- The selection process, key points, calculations, and decisions are described in **the Water Conservation Technical Memorandum** (Supplemental Document 15).
- The Council states in DM6 on page 6-6 that “A focus on desired performance outcome will support increased conservation while allowing farmers to select what practices will work best for their own operations.”
- The DM6 description lists conservation practices that might be used to meet the stated conservation benchmark.

CONSERVATION

RESPONSE (cont.):

- Page 1 of the Water Conservation Technical Memorandum explains the heavy focus on agricultural uses:
 - Table 1 shows the current (2005) and forecast future (2050) water withdrawals in the region. Agriculture is the largest water use sector. Much of the Council's discussion focused on this sector, but other sectors were also discussed, and management practices were included in the plan to address all sectors.
- While the Council focused most heavily on agricultural uses due to their predominance, it addresses conservation for **non-farm uses (municipal, industrial, energy) in DM3 and DM4**. Specific practices from the DNR Rules, State Water Plan, and Water Stewardship Act are cited in the description column of Table 6-1 for these management practices. The plan also addresses the need for information on baseline implementation of these practices by non-farm uses in the Recommendations in Section 7.4.

CONSERVATION

RESPONSE (cont.):

- Cost information considered is given in **Table 7-2**. Estimates are largely based on the Supplemental Guidance on costs, with several modifications and corrections made in discussions with the contractor that developed that document.
- It was not possible to estimate total costs for many practices because the extent of current implementation is unknown. The need for baseline implementation information is described in the plan, and the plan includes recommendations to address this information need. The costs of irrigation suspension are estimated in the Water Conservation Technical Memo (Supplemental Document 15).
- Calculating water savings for the practices listed in Table 6-1, DM3 and DM4, would be very rough estimates, given the lack of available baseline implementation information. Some would also be limited by the qualitative nature of the practices (e.g., submittal of conservation plans by withdrawal permittees).

CONSERVATION

RECOMMENDATION: Add the following to the Water Conservation Technical Memorandum in Section 2:

Costs for demand management practices and other types of management practices are estimated in Table 7-1 of the plan. Cost estimates are for broad categories of practices, but allow for some cost comparison. The total costs of implementation were not possible to estimate because of the lack of baseline implementation information. The Council recommends the assessment of baseline implementation of conservation practices in Section 7.4 of the plan. Cost is an important factor in selecting management practices, but the Council did not use this information to set a preference for one type of practice over another, because the Council recognizes that all types of management practices will be needed in the region.

Furthermore, for agriculture, the Council recognizes that costs for management practice implementation can vary widely depending on location specific conditions, and therefore the Council recommends benchmark performance targets for agricultural water conservation rather than calling for the use of specific practices. Selection of the most appropriate, specific practices for agricultural water conservation is left to the farmer.

CONSERVATION

RECOMMENDATION: Add a new last paragraph on page 1 on the Water Conservation Technical Memorandum as follows:

In Section 3, this memorandum calculates water savings to the extent possible for several conservation management practices listed in Section 2. Water savings estimates are focused on those areas where the best information to support estimates was available. However, the Council's plan includes management practices that address all water use sectors, and it addresses the need for better information on baseline implementation of conservation practices and the effectiveness of those practices.

CONSERVATION

RECOMMENDATION: Add new water savings estimates for selected non-farm water conservation practices to the Water Conservation Technical Memorandum.

SECTION 3

RECOMMENDATION: To address some of the public comments, need to clarify in the notes to Figures 3-1 through 3-4 (page 3-2) and 4-1 and 4-2 (page 4-6) that demand estimates and forecasts are for the planning region, not to a specific watershed.

EXECUTIVE SUMMARY

(see pages 20 & 26 of packet)

EPD:

- (1) In the table titled “Resource Assessment Results – UF Region”, for Surface Water Quality under the column titled “Summary of Model Results”, it states that “results indicated decreasing availability of assimilative capacity in streams as discharge flows increase.” It should be noted here ***that in certain segments of the Flint watershed the model indicates that no assimilative capacity is left.***
- (2) In the column titled “Council Plan to Address Results”, suggest wording could be change: “Collect more complete information to confirm model results and to support the targeting of management practices for water quality in the future.”

RECOMMENDATION: Adopt these suggested changes.

SECTION 3 (see pages 20 & 21 of packet)

RECOMMENDATION: Adopt suggested changes. For page 3-8, modify the last paragraph as follows:

Figure 3-5 shows the in-stream dissolved oxygen (DO) model results for current discharges given critical low flow (7Q10), high temperature conditions. Stream segments that were predicted by the model to have exceeded the available assimilative capacity are shown in red. Streams that are at the allowable DO levels are shown in pink, and those predicted to have DO levels in excess of state water quality standards are shown in blue. ~~Naturally low DO waters (below 5.0 mg/L in the summer) are typically in the yellow to red range.~~ It is important to note that some streams are naturally low in DO, but these streams cannot necessarily be discerned from in Figure 3-5 because the map indicates the effects of discharges as well as natural conditions for all streams. Assimilative capacity appears to be available for stream reaches in the region based on dissolved oxygen modeling results. The number of stream miles where assimilative capacity was exceeded or unavailable under current conditions in the model was 8.80 miles in the Flint River Basin (as a whole) and 13.77 miles in the Ochlockonee River Basin.

SECTION 5 (see page 22 of packet)

EPD: The estimated 2050 groundwater withdrawal numbers for the Cretaceous Aquifer in Table 5-1 (page 5-3) should be 267-303 mgd (and the equivalent cfs numbers should be adjusted accordingly).

RECOMMENDATION: Make this correction.

EPD: Page 5-4, last paragraph in Section 5.2, modify 1st sentence as follows:

As discussed in Section 3, the sustainable yield results for the Upper Floridan aquifer in the Dougherty Plain were determined based upon the impact of groundwater withdrawals on groundwater contributions to stream baseflows, surface water flows, rather than on the condition of the aquifer itself.

RECOMMENDATION: Adopt suggested change.

SECTION 5

EPD: Page 5-5, Figure 5-1, in the table that compares current and future assimilative capacity, the “at assimilative” and “exceeds assimilative capacity” stream segments are added together so it appears things get worse in the future. In several 2050 models there is a decrease in segments that “exceed assimilative capacity.” ***Recommend adding a column to the table to show “at” and “exceed” as separate categories.*** Also note, ***the 2050 model represented the scenario whereby all the facilities had permit limits adjusted so as not to exceed the assimilative capacity of the streams into which they discharged*** - which resulted in no red zones.

RECOMMENDATION: Adopt suggested changes.

SECTION 7 (see page 23 of packet)

GEFA: In Table 7-2 (on page 7-7), the Council should consider adding the Georgia Land Conservation Program as a responsible party for item WQ-2 (Improve Implementation of Nonpoint Source Controls).

RECOMMENDATION: Adopt suggested change.

SECTION 4 (see page 22 of packet)

RECOMMENDATION: Delete “for EPD by CDM, Inc.” so that the 1st sentence of Section 4.4 reads: “Forecasts of water use in thermoelectric power production were made ~~for EPD by CDM, Inc.~~, with the guidance of an advisory panel that included power industry representatives and the Georgia Environmental Facilities Authority.”

SECTION 7 (see page 23 of packet)

1) Table 7-2: Footnote “b” is used in a number of places that do not seem to fit with the concept of cost per million gallons saved. Please review and delete where needed or clarify note b.

RECOMMENDATION: Delete the word “saved” in first line of note (b). It applies to both “saved” and “yielded”, and if so described, the note is appropriately placed throughout the table.

SECTION 8

2) P. 8-4:

In the 2nd to last row of the table, "triennial" should actually be "biennial."

RECOMMENDATION: Adopt suggested change.

FORMATTING AND PRESENTATION

(see page 25 of packet)

RECOMMENDATION: Planning contractor will incorporate suggested changes and corrections into final plan. Planning contractor will review document for consistency with style templates.

PUBLIC COMMENTS

1. Ross King, Association of County Commissioners
2. Jenny Hoffner and Gordon Rogers, Flint Riverkeeper and American Rivers
3. Stephen McCullers, Cobb County Water System
4. Zippy Duvall, GA Farm Bureau
5. Tammy Wyles, GA Industry Environmental Coalition
6. Tanya Blalock, GA Power
7. Katie Kirkpatrick, GA Water Alliance
8. GA Water Coalition
9. James Phillips, Middle Chattahoochee Water Coalition
10. Sara Barczak, Southern Alliance for Clean Energy
11. Shelly Lakly, Nature Conservancy
12. Billy Turner, Tri Rivers Waterway Development Association
13. Sandy Tucker, U.S. Fish and Wildlife Service
14. Sally Bethea on behalf of several GA Riverkeepers
15. Jack Gleason
16. Deborah Phillips, GA Industry Environmental Coalition
17. Bryan Tolar, GA Agribusiness Council
18. Randall Starling
19. William Moore

PUBLIC COMMENT THEMES

- Implementation concerns
- Continuation of regional planning
- Resource assessment data, approach, targets
- Forecasts (growth scenarios, energy)
- Conservation priority
- Storage concerns
- Gap closure
- Council membership
- In-stream flow needs
- Water quality concerns