

Public Comment Summary						
Comment Number	Page	Commenter		Council(s) of Interest	General Points (Internal Use only)	Lower Flint Reference
		Organization(s)	Author			
1	10	Association County Commissioners of Georgia	Ross King, Executive Director	ACF	1. Concerns with implementation of plans. 2. Concerns with unimpaired flows.	1. The Council recognizes this work as a starting point and supports continued regional water planning. The Council also had concerns with the data used in the surface water availability assessment, and it believes that the data used in the baseline assessment did not reflect actual conditions and resulted in an overestimation of flow shortfalls in the Flint River Basin, as described in Section 3.2. The Council shares concerns over how the results of the assessment models will be used in permitting and recommends against modification of any permitting practices based on the assessments at this time in Section 5.4. 2. The Council supports continued regional planning and funding for implementation of the regional plans. Recommendations can be found in Section 7.4. The Council also recommends the collection of better information for future assessments.
2	22	Flint Riverkeeper & American Rivers	ner for American Rivers & Gordon Rogers, Flint Riverkeeper	UFL & LFO	1. Water Use planning should be conducted for a range of growth scenarios. 2. Aggressive water efficiency was not explored as a viable source of water supply. 3. Conservation should be prioritized as a high priority management practice, should be conservation targets, water users should adopt recommendations of GCIP, should be more state funding. 4. Conduct a triple-bottom line analysis for reservoirs. 5. Recommended that the state should adopt New Mexico's "per capita water use" indicator 6. Need to diversify Council representation. 7. Need to change planning nodes. 8. Emphasis on capture and control is unbalanced, jump to	1. The growth scenarios considered were presented to the Council by EPD's contractor. The Council members considered how actual growth might vary from projected in their deliberations. 2. Water use efficiency was considered as a primary tool for water quantity management in the region. For more detail, see the Water Conservation Technical Memo included in the Supplemental Materials. 3. The Council reviewed the WCIP in developing its recommendations, and it cites the WCIP and the State Water Plan's conservation elements in its plan. The Council recognizes that all tools -- conservation, storage, augmentation -- must be considered to address quantity concerns in the Flint River Basin. The Council does recommend an assessment of the potential water savings from agricultural water conservation in the region through establishment of a baseline survey of existing conservation measures. Details on conservation measures are provided in the Conservation Technical Memo which is a part of the supplemental materials to the plan. The plan cites other sources for conservation measures and goals (cites the State Water Plan for municipal/industrial, cites the WCIP for agricultural). 4. The Council made its recommendation regarding the need to assess potential storage very carefully after considering all options and the assessment results. The

			<b>Jenny Hoff</b>		<p>conclusion of "additional storage". 9. Energy uses are trivialized. 10. Landscape changes are not accounted going forward. 11 Water Quality Issues are poorly analyzed. 12. Concerns about EPD continuing to Permit</p>	<p>assessment results cannot be fully addressed unless all options are included in the effort to address shortfalls identified by the model. Conservation is critical, but alone, it cannot close the identified shortfalls. To clarify in response to the comment about withdrawals for storage above Montezuma, upstream diversions for storage in the Flint were assumed to be much larger in the assessment model than permitted, and that contributed to an overestimate of the flow shortfall. See Section 3.2 of the plan and Supplemental Document 8. #5., 7. , and 10. Comments on the methods for per capita water use and the selection of nodes should be directed toward EPD. 6. Comments on Council membership should be directed to appointing authorities. 8. See above response regarding need to include all approaches to address the large shortfalls identified by the model. 11. The plan makes several water quality recommendations and suggestions for improved data collection in the future. The late availability of water quality data in the planning process was a challenge, but the Council did fully consider the information when it became available. 12. The Council recommends funding for and implementation of the Flint River Drought Protection Act.</p>
3	31 (and 260)		<b>Brad Currey</b>	<b>LFO</b>	<p>Ag needs to implement conservation to reduce the gap to reduce reliance on Chattahoochee for flows at the Florida line.</p>	<p>Table 6-1 lists management practices -- all directed at addressing the "gap" including conservation , augmentation, and storage. Plan also makes many recommendations for improving the information base for planning, including refinement of the resource assessment models, inputs, and targets to support better planning in the future. Agriculture does already implement water conservation to a great extent in the region. The Council recognizes this importance of existing conservation measures and calls for increased implementation and the attainment of substantial goals for water conservation from agriculture. Recommendations concerning conservation from other uses (citing the State Water Plan) are included in the LFO plan. Addressing the shortfalls identified by the model will require the use of all possible tools.</p>

4	51	Cobb Co.	Stephen D. McCullers, Director	ACF	Metro's Water conservation best management practices should be applied throughout the state	The Council selected demand management practices to address their specific vision and goals and gaps.
5	54	Ga. Farm Bur.	Zippy Duvall, President	UFL and LFO	Concern about cost of switching from surface to groundwater withdrawal; supports incentives and cost-share for this practice.	With regard to the conversion of surface water withdrawals to groundwater withdrawals, the Council also supports incentives and cost-share opportunities to support implementation of this practice.
6	57	GIEC	Tammy Wyles, Chair	ACF	1. Reconsider the unimpaired flow regime criteria. 2. State should insist on begin to close a verified streamflow gap. 3. Suggest plans note that Septic systems and LAS returns will be included in future plan updates.	<p>The Council discussed the surface water availability assessment at length. The Council, in its Recommendations to the State, recommends that the State provide funding for and continue to refine the water resource assessments used in the plan. Specific comments on the resource assessments should be directed to EPD. The Council considered and questioned the inputs, assumptions, and targets of the surface water availability model. In its plan, the Council calls for a better understanding of the implications of the flow targets (and not meeting them) for downstream users and instream uses.</p> <p>These issues were discussed between the MCH, UFL, and LFO councils and a set of joint recommendations was made which included recognizing the need for more storage in the basin to offset low flows, improving the resource assessments, and reevaluating minimum downstream flow requirements. The Council did address the full "gap" as identified by the surface water assessment model, though it questioned the results, too. The Council includes a full range of recommended practices, including conservation, augmentation, alternative supplies, and storage to "close the gap". However, the Council also notes the need to better understand the meaning of the gap and its implications for downstream users and in-stream needs because complete closure of the Bainbridge gap will require such a significant response and could have drastic impacts to the regional economy.</p>

7	65	Ga. Power	Tanya Blalock, Environmental Manager	ACF	<p>1. The Plans do not consistently anticipate water needs for energy past 2020. 2. The Plans anticipate future short-term energy production consumptive use declines ,but long term this may not continue. 3. Potential to create varying standards across the state for permitting 4. Plan fail to recognize permittees follow water conservation and drought contingency plans as part of the permitting process. 5. Actual water use in lieu of permitted use may yield unreliable results. 6. Water is vital to Georgia Power. 7. EPD should require a flexible approach. 8. EPD should clarify the future role of regional water management councils. 9. Naturally occurring water quality conditions should be accounted. 10. EPD Should insist on the same definitions of key terms. 11. Should acknowledge that only the Tier One water demand management practices are mandatory. 12. MCH - Table 2-1 should be revised, Dissolved oxygen modeling has not been conducted, Page 3-9 footnote 6 is inaccurate, edit on page 3-6 and 4-8.</p>	<p>The LFO plan (Section 4.4) recognizes that future energy production in the state will require water supply, but the location of future production capacity is not known at this time. In response to the comment about the use of actual vs. permitted use levels, the Council addresses several specific areas in its plan where actual use levels will increase the accuracy of surface water availability assessments, including agricultural water use (support for metering program) and withdrawals for upstream storage in the Flint (modeled withdrawals lead to a substantial overestimate of the "gap" under maximum conditions, see Section 3.2.1 and Supplemental Document 8). The Council agrees with the preference for a flexible approach; this is reflected in its conservation recommendations.</p>
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8	75	Ga Water Alliance	Katie Kirkpatrick, Vice-President	ACF	<p>1. Need for clarity on the implementation of regional water plans. 2. Use of unimpaired flows. 3. Regional water councils should be reconstituted. 4. Each Regional plan should establish reasonable benchmarks. 5. EPD needs to develop a plan on how to implement the plans.</p>	<p>The Council also had concerns that the data used in the surface water availability assessment, and it believes that the data used in the baseline assessment did not reflect actual conditions and resulted in an overestimation of flow shortfalls in the Flint River basin as described in Section 3.2 and Section 5. The Council shares concerns over how the results of the assessment models will be used in permitting and recommends against modification of any permitting practices based on the assessments at this time in Section 5.4. The Council supports continued regional planning and funding for implementation of the regional plans. The Council also recommends the collection of better information and reliance on more actual conditions data in future assessments. Recommendations can be found in Section 7.4. The plan lists numerous benchmarks for plan implementation; see Section 8. With regard to "gap" closure, the Council did aim to address the full "gap" as identified by the surface water assessment model, though it also questioned the results. The Council includes a full range of recommended practices, including conservation, augmentation, alternative supplies, and storage to "close the gap". However, the Council also notes the need to better understand the meaning of the gap and its implications for downstream users and in-stream needs because complete closure of the Bainbridge gap will require such a significant response. Additionally, many of these issues were discussed between the MCH, UFL, and LFO councils and a set of joint recommendations was made which included recognizing the need for more storage in the basin to offset low flows, improving the resource assessments, and reevaluating minimum downstream flow requirements.</p>
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9	80 (and 250)	Ga Water Coalition		ACF	<p>1. Suggest changing public input format for next iteration. 2. Need to empower and fund Council and make more legislatively binding, especially with regard to conservation. Many plans failed to include "serious water conservation and efficiency tools" in their Recommendations to the State. 3. Need for better planning boundaries. 4. Need for better timing and quality of information. 5. Concerned about the EPD oversight and modifications of the Regional Plans. 6. Improper assumption in energy forecasts. 7. Need to have a range of growth scenarios. 8. Had concerns with some scientific assumptions such as 7Q10 and the need for an alternative minimum instream flow. 9. Failure to include out of state water uses.</p>	<p>1. Many opportunities for public comment were provided. 2. It should be noted that the Council recommended implementation of SB 370 conservation requirements in its recommendations. The Council included water conservation recommendation for all users in Section 6 of the plan. Water use efficiency was considered as a primary tool for water quantity management in the region. For more detail, see the Water Conservation Technical Memo included in the Supplemental Materials. The Council reviewed the WCIP in developing its recommendations, and it cites the WCIP and the State Water Plan's conservation elements in its plan. The Council recognizes that all tools -- conservation, storage, augmentation -- must be considered to address quantity concerns in the Flint River Basin. 4. The Council reviewed extensive technical materials in its meetings. Some information came late in the process, but Council members were fully committed to considering the best information available in developing its plan. The Council makes several recommendations related to future information needs in Section 7.4 of the plan. 5. The Council fully supports the content of its recommendations and management practices in the May draft released for public comment. 7. The growth scenarios considered were presented to us by EPD's contractor. There was an opportunity to comment on the growth projections, and the Council could consider how actual growth might vary from projected in their deliberations. The per capita use rates, adjusted to reflect expected water savings due to plumbing code savings, were a baseline estimate for water demand. The Council does support implementation of water conservation practices and included water conservation recommendation for all users in Section 6 of the plan. Water use efficiency was considered as a primary tool for water quantity management in the region. 8. The Council also had concerns about assumptions and targets in the resource assessments, described in Sections 3 and 5 of the plan, and the Council made several recommendations regarding information needs to improve future regional water planning (see Section 7.4). Specific comments on the resource assessment should be directed to EPD. With regard to the modeling limit of 40 feet of drawdown for the groundwater assessment, it was not the metric that drove the model results for the Floridan Aquifer, Dougherty Plain.</p>
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10	96	Metro Dist.	Boyd Austin, Chairman	ACF	<p>LFO - State needs to implement Council's recommendation to improve ag water use efficiency and high priority recommendations made by the Council.</p> <p>MCH - Recommends conservation-oriented rate structures to be required of all local utilities, Releases from Federal Reservoirs should not be made to dilute wastewater discharges, 9 foot navigation channel as envisioned in 1946 is not feasible, Recommend comparable levels of treatment and BMPS throughout the basin. UFL - Water use efficiency should be required for all users and the State should include storage in the Flint River Basin to offset agriculture use as a very high priority.</p>	<p>Comments are supportive of the Council's plan. Council notes, however, that the Bainbridge "gap" also includes the effect of assumptions that maximized upstream withdrawals for storage in the Flint, well above actual levels, and not only the impacts of consumptive water use. The Council recognizes that all tools -- conservation, storage, augmentation -- must be considered to address quantity concerns in the Flint River Basin.</p>
11	110	M.C. Wtr Coal.	James Phillips, President	ACF	<p>1. Provided flows that should be maintained. 2. States congressionally authorized purposes of the five reservoirs should become an integral part of any plan developed.</p>	<p>MCH reviewed flow targets and lake levels for Chatt in detail.</p>

12	116	S. Alliance Clean Energy	Sara Barczak	ACF	<p>1. Significant overestimation by EPD of the amount of water the state needs to set aside for electricity generation. 2. Failure to provide a low-water consuming energy scenario. 3. EPD omitted key non-utility energy industry players. 4. Information about utility energy water forecast was kept undisclosed. 5. Some of the draft regional water plans draw erroneous conclusions. 6. Outside Georgia power plants. 7. Did not include the potential for possible future groundwater use.</p>	<p>Council has recognized that water needs for future energy production requires additional study in the future.</p>
13	145	Nature Conservancy	Shelly Lakly, Executive Director	ACF	<p>1. EPD should ensure that the models are fully verified and validated before the second round of planning begins. 2. EPD should effectively utilize the Scientific and Engineering Advisory Panel for this purpose. 3. Instream flow policies need to be scientifically based and protective of resources. Adopt the following in Recommendations to the State: Evaluate minimum instream flow and unimpaired flow assumptions in the Surface Water Availability Resource Assessment. Consider pilot site-specific instream flow studies in the "X" basin (at locations predicted to have instream flow shortage). In combination with a low flow monitoring program and an agricultural</p>	<p>The Council recommended further studies and refinement of the water assessments conducted for future plan updates. The Council does include Tier 3 (as well as Tier 4) conservation practices in its recommendations (not mandatory). It also considered the issue of increasing returns to the stream. The Council supports full evaluation of potential storage projects, as recommended in its plan. Conducting a detailed evaluation of a specific storage project was not within the scope of the planning process.</p>

					<p>use metering program, confirm the magnitude and frequency of predicted gaps. Updated Surface Water Availability and Surface Water Quality Resource Assessment models based on the results of the studies for future Regional Water Plan update." 4. EPD should act quickly to address LFO's data request. 5. EPD should develop a watershed-based permitting framework using the resource assessment and Council recommendations, making every effort to coordinate upstream and downstream plans within a watershed. 6. All regional water planning councils should include Tier 3 water conservation management practices. 7. All council should include in their plans the maximization of returning clean water to streams and rivers before constructing water supply reservoirs. 8. Councils should detail how they followed the comprehensive water supply reservoir policy.</p>	
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14	151	Tri Rivers	Billy Turner	ACF	<p>1. Withdrawal of 27 mgd and discharge of 21 mgd not included in Mid Chatt plan. 2. The need for water to support existing and future industry is not adequately recognized in the currently recommended plan. 3. Table 6-1 should include navigation as a purpose.</p>	<p>LFO noted the need for improved information regarding projected water needs and water quality in the future. LFO also recommended enhanced monitoring for future refinement of the resource assessments. The noted withdrawal and discharge are included in the counties in the LFO and appear in the LFO plan.</p>
15	171	USFWS	Sandy Tucker	ACF	<p>1. Recommend more data and discussion on natural flow. 2. Plans fail to ensure management practices are incorporated in water planning will protect species listed under ESA or State Wildlife Protection Act. 3. Regional water plans do not include conservation savings in calculations of future water demands. 4. Plans do not evaluate large-scale interbasin transfer on water resource in the donor basin. 5. Plans do not emphasize minimizing impacts of upstream activities that increase sediment-loads in the river. 6. Language in goals needs to be stronger and more proactive. 7. Downstream uses are not fully considered 8. Recommend plans prioritize those management</p>	<p>The Council raised its own questions about the resource assessments and targets used in the assessments, and it did not rely wholly on the resource assessments as it developed its plan. Some questions may be answered in the forecasting technical memo (supplemental material to the plan) and in the resource assessment reports (cited in the plan), and comments on the resource assessments should be directed to EPD. The Council considered listed species in its discussions, and it also received input from wildlife agency personnel (USFWS, WRD) during the planning process. Conservation savings are addressed in the Conservation Technical Memorandum (supplemental material to the plan). The plan includes several recommendations that are designed to address nonpoint sources of pollution, including sediment. The Council carefully considered which management practices to recommend as mandates, which to recommend as voluntary measures, and where more information is needed. The management practices of highest priority are indicated in the plan. The Council raised concerns over its inability to evaluate the management targets used in terms of the impacts on downstream users. More information on these impacts is needed to support more refined planning and management in the future. MPs DM6, DM7 (via low flow requirements for new</p>

					practices that will achieve water conservation as soon as possible. 9. Plans should have more drought contingency planning. 10. Recommended certain practices before reservoirs are considered. 11. More emphasis on education. 12. Recommend all the basin plans be modified to incorporate an awareness of the interrelationship of surface water, ground water and water quality.	permits), SF1 and SF3 address drought conditions. The council recommends (in SF1) that the consideration of additional storage in the region should include an assessment of environmental factors. The surface water availability and groundwater availability resource assessments both included evaluation of the relationship between groundwater and surface water. (Surface water availability assessment estimated impacts of groundwater withdrawals on the Flint in the Floridan-Dougherty Plain; groundwater availability assessment included as an evaluation metric the impact of groundwater withdrawals on stream baseflow.) The Council discussed this connectivity extensively in its planning process and addresses this in the plan. The Council was briefed on the 5000 cfs target in relation to listed species. The Council's plan was developed with specific consideration of concerns for listed species. Council members were briefed by USFWS and held follow-up meetings with the USFWS. The Council's recommendation regarding a possible HCP was developed based on discussions of this issue.
16	219	River Keepers	Sally Bethea	ACF	1. Lack of integration among assessments. 2. Deficiencies of surface water availability assessments. 3. Deficiencies of ground water availability assessments. 4. Deficiencies of assimilative capacity assessments.	The surface water availability and groundwater availability resource assessments both included evaluation of the relationship between groundwater and surface water. (Surface water availability assessment estimated impacts of groundwater withdrawals on the Flint in the Floridan-Dougherty Plain; groundwater availability assessment included as an evaluation metric the impact of groundwater withdrawals on stream baseflow.) Comments on the resource assessments should be directed to EPD. The Council raised its own questions about the resource assessments and targets used in the assessments, and it did not rely wholly on the resource assessments as it developed its plan. The Council supports further refinement of the resource assessments to improve the information base on which planning is conducted in the future.

17	239		Jack Gleason	ACF	1. Designate ACF as Regionally Important Resource. 2. Incorporate more measures for Stormwater management plans. 3. Impose strict implementation and enforcement on buffers.	Flint River basin and Southwest Georgia water resources have been designated Regionally Important Resources, and plans exist with recommendations for local governments, which were also considered by DCA during developments of regional impact reviews. The Council discussed implementation of additional stormwater management practices in its deliberations. The council recommendations included several water quality management practices in its plan, with one emphasizing the need for improved nonpoint source controls. The Council devoted a significant amount of its time discussing the appropriate balance of requirement versus encouragement for each of the recommended practices.
18	244	GA Industry Environmental Coalition	Deborah Phillips	All	Series of comments relate to 7Q10.	Comments on 7Q10 calculation -- Council also had concerns about model inputs and target. Recommended improvements in data and models for better planning in future. Specific comments on resource assessments should be directed at EPD, which had a public comment period on the resource assessments. Council agrees with the need to coordinate across regions.
19	256		Bryan Tolar	LFO	Agreed with Council on major points.	Supportive comments for Council's plan
20	258	Tall Timbers	Neil Fleckenstein	LFO	1. Disagree with the recommended "High Priority Management Practice" of reservoir storage options. 2. Regional Water Planning should continue. 3. Ochlockonee could benefit from additional studies.	Agree on high priority of innovation for conservation, the need to better understand "gaps", and continuation of the planning process. Council does not believe it can take storage out of the "toolbox" if it is to address the gap identified by the model. Need all approaches -- conservation, augmentation, and storage -- to address the "gap". Management practices apply to Ochlockonee as well as rest of region. More information to support planning and management is helpful.

21	261		J. McClatchey	LFO	<p>1. Challenged Council Gap Discussion. 2. Believes Ag Water use is understated. 3. Recommendations to address Ag Water Use</p>	<p>The Council did have significant questions about the planning targets, assumptions, and inputs used in the resource assessment models. The Council's plan makes many recommendations for improving the information base for planning, including refinement of the resource assessment models, inputs, and targets to support better planning in the future. Table 6-1 lists management practices -- all directed at addressing the "gap" including conservation, augmentation, and storage. Agriculture does implement water conservation to a great extent in the region. The Council recognizes the importance of existing conservation measures and calls for increased implementation and the attainment of substantial goals for water conservation from agriculture. Recommendations concerning conservation from other uses (citing the State Water Plan) are included in the LFO plan. Addressing the shortfalls identified by the model will require the use of all possible tools. The large difference in net consumptive use in the LFO vs Metro is in part a result of the assumption that ag water use is 100% consumptive, an assumption that the Council questioned, but accepted as necessary to proceed with planning due to a lack of information. Groundwater permits are not currently issued in an unlimited fashion. In fact, they are issued according to the Flint Plan of 2006, which manages issuance based on impacts on surface water flows. The council's plan cites the 2006 plan and supports its continued implementation. New ag withdrawal permits are subject to mandatory conservation requirements. MPs DM6, DM7 (via low flow requirements for new permits), SF1 and SF3 address drought conditions. The Council did address the full "gap" as identified by the surface water assessment model. The Council includes a full range of recommended practices, including conservation, augmentation, alternative supplies, and storage to "close the gap". However, the Council also notes the need to better understand the meaning of the gap in terms of its impacts on downstream and instream uses.</p>
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