



**Responses to Comments on:**

**Coosa-North Georgia Regional Water Planning Council's  
Regional Water Plan**

As provided in the Comprehensive Statewide Water Management Plan, before taking action to adopt any regional water development and conservation plan, the Director shall provide public notice of the recommended plan and a comment period of at least forty-five days. EPD provided this comment period from May 9, 2011 to June 23, 2011.

Comments were received via EPD's interactive comment collection website, via e-mail, fax and mail. All comments received are available on Georgia's water planning website here: [http://www.georgiawaterplanning.com/documents/CombinedComments8-22-11\\_000.pdf](http://www.georgiawaterplanning.com/documents/CombinedComments8-22-11_000.pdf)

This document provides a summary of comments and responses specific to the Coosa-North Georgia Regional Water Planning Council's plan received during the public comment period. The summary of comments and responses directed to EPD or that apply to multiple plans can be found here:

[http://www.georgiawaterplanning.org/pages/regional\\_water\\_planning/EPD\\_Responses\\_to\\_EPDCentered\\_Public\\_Comments.php](http://www.georgiawaterplanning.org/pages/regional_water_planning/EPD_Responses_to_EPDCentered_Public_Comments.php)

**Comment:** The meaning of the Coosa North Georgia Council's recommendation for new agricultural permit requirements should be clarified.

**Response:** The Coosa North Georgia Council discussed this comment. The agricultural permitting recommendations referenced in the Council Plan are part of the 2010 Water Stewardship Act requirements.

**Comment:** The Coosa North Georgia Council's recommendation to develop nutrient management guidelines should include consultation with farmers when guidelines are developed.

**Response:** The Coosa North Georgia Council discussed this comment. The Council added the following language on page 7-24: "Ensure input of farmers when developing regional nutrient management guidelines addressing fertilizer/nutrient management, cropland management, and animal waste management for major agricultural sectors in CNG region."

**Comment:** Implementation of the 14 water conservation management practices recommended in Coosa North Georgia Council's plan is supported by commenter.

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**Response:** The Coosa North Georgia Council discussed this comment. Thank you for your comment and your interest in the Coosa North Georgia Regional Water Plan.

**Comment:** The Coosa North Georgia Council's recommendations about 1) evaluating a requirement of variable rate irrigation is costly and may be problematic for some farmers, and 2) developing regional recommendations and model stream buffer protection ordinances that go beyond minimum state standards creates additional restrictions on private property.

**Response:** The Coosa North Georgia Council discussed this comment. The Council recognizes that management practices to address water quality (such as riparian buffers) and water supply (variable rate irrigation) have costs associated with them, and these costs were included in the Council's discussions. The Council has recommended that these practices should be encouraged, rather than required.

**Comment:** Regarding water conservation management practices in the Coosa North Georgia Council's plan, stronger language should be used (E.g. "require" vs. "encourage.") and rain harvesting should be listed as a separate practice.

**Response:** The Coosa North Georgia Council discussed these comments; no action was taken to change the plan.

**Comment:** Regarding water supply management practices in the Coosa North Georgia Council's plan, expansion of existing reservoirs should be a priority above construction of new reservoirs.

**Response:** The Coosa North Georgia Council discussed this comment. The Council prioritized expansion of existing reservoirs above creating new ones. The Council also included development of new reservoirs as a possible practice to be evaluated for future water supply where storage may be needed.

**Comment:** Regarding water supply management practices in the Coosa North Georgia Council's plan, more research is needed on Aquifer Storage and Recovery before proceeding as a management practice.

**Response:** The Coosa North Georgia Council discussed this comment. The Council included Aquifer Storage and Recovery in the plan with the language "Evaluate feasibility of aquifer storage and recovery," to allow use where economically and environmentally feasible.

**Comment:** Regarding wastewater management practices in the Coosa North Georgia Council's plan, commenter supports septic tank pumping.

**Response:** The Coosa North Georgia Council discussed this comment. Thank you for your comment and your interest in the Coosa North Georgia Regional Water Plan.

**Comment:** Regarding Water Quality practices in the Coosa North Georgia Council's plan, caution is urged when considering water quality credit trading.

**Response:** The Coosa North Georgia Council discussed this comment. The Council feels that water quality credit trading is an important tool to address water quality impairments,

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and has selected a trading feasibility study as a Nonpoint Source Implementation project, funded by Section 319(h) funds.

**Comment:** The Coosa North Georgia Council's plan should specifically address inter-basin transfers.

**Response:** The Coosa North Georgia Council discussed this comment. The Council's plan does not preclude or encourage inter-basin transfers and recognizes that this tool should be carefully considered. The Council considers the Tennessee River a potential source of water and does not want to eliminate possible future scenarios.

**Comment:** The Gaylesville, New England and Chickamauga gaps in the Coosa North Georgia Region are not expected to impact the Metropolitan North Georgia Water Planning District.

**Response:** The Coosa North Georgia Council discussed this comment. Thank you for your comment and your interest in the Coosa North Georgia Regional Water Plan.

**Comment:** The discussion regarding changes in operation of federal reservoirs to meet 2050 demands recommended in Coosa North Georgia Council's plan the should involve the Metropolitan North Georgia Water Planning District.

**Response:** The Coosa North Georgia Council discussed this comment. The Council agrees the involvement of interested and affected parties will be important in future planning efforts as appropriate.

**Comment:** Coosa North Georgia Council's plan should ensure a level playing field in regard to management practice implementation by all stakeholders to address nutrients for point and non-point sources.

**Response:** The Coosa North Georgia Council discussed this comment. The Council selected management practices to address nutrients and non-point sources. Implementers in the region can select from this list to implement practices to address water quality issues specific to their areas.

**Comment:** Coosa North Georgia Council's recommended water quality management practices to address 303d listed streams and nutrients are supported by commenter.

**Response:** The Coosa North Georgia Council discussed this comment. Thank you for your comment and your interest in the Coosa North Georgia Regional Water Plan.

**Comment:** Coosa North Georgia Council's plan does not mention North Carolina Department of Environment and Natural Resources as an implementation partner regarding the impairments that could be addressed cooperatively in the Hiawassee and Little Tennessee basins.

**Response:** The Coosa North Georgia Council discussed this comment. The Council added the following language to the Regional Plan on page 7-2: "Finally, it is important to seek out opportunities for implementation across state lines with partners to address impairments and improvements to inter-state waters."

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**Comment:** Coosa North Georgia Council's plan should encourage use of the Chickamauga Creek in Walker County which runs north to Chattanooga, TN. as a water source for Georgia residents.

**Response:** The Coosa North Georgia Council discussed this comment. The Council's plan encourages EPD to explore opportunities for Georgia to expand the use of the Tennessee River as a water supply source.

**Comment:** The current and future water demand and wastewater assimilation of the Upper Chattahoochee River located in parts of Dawson, Habersham, Lumpkin, and White Counties in the Coosa North Georgia Region do not appear to have an appreciable negative impact on the Metropolitan North Georgia Water Planning District.

**Response:** The Coosa North Georgia Council discussed this comment. Thank you for your comment and your interest in the Coosa North Georgia Regional Water Plan

**Comment:** Coosa North Georgia Council's plan should be revised with regard to the water consumption narrative on page 4-10.

**Response:** The Coosa North Georgia Council discussed this comment. The Council added the following language on page 4-10: "The process of generating the forecasted water demands and wastewater returns for thermoelectric power generation is documented in the supplemental document titled Statewide Energy Sector Water Demand Forecast, which is available on the Council website. It should be noted that the future water demands and returns decrease in 2030, which is attributed to the increase in available capacity of less water-withdrawal-intensive power generation and relatively stable capacity factors."

**Comment:** Coosa-North Georgia Council's plan does not adequately consider Alabama's needs.

**Response:** The Coosa North Georgia Regional Council and EPD invited representatives from other states to the kick-off, joint and water planning council meetings, and worked with representatives who attended. EPD senior staff also held conferences calls and meetings with representatives from Alabama and other neighboring states to discuss the Regional Water Plans. It is anticipated that subsequent rounds of regional water planning will benefit from continued coordination and improved water use data from other states.

**Comment:** The Metropolitan North Georgia Water Planning District recommends the use of comparable high treatment limits for future wastewater discharges to protect shared water resources of all stakeholders.

**Response:** The State Water Plan states that regional water plans will guide decisions regarding permitting. Although the regional water plans will provide valuable regional perspectives, they will be one of several sources of information that EPD will use in permitting and the plans themselves will not result in new rules. EPD permitting program carefully evaluates discharge permits to ensure water quality standards are not exceeded for any receiving water body.