



**Responses to Comments on:**

**Savannah-Upper Ogeechee 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 Savannah-Upper Ogeechee 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\\_EPDCenteredPublicComments.php](http://www.georgiawaterplanning.org/pages/regional_water_planning/EPD_Responses_to_EPDCenteredPublicComments.php)

**Comment:** The Savannah-Upper Ogeechee Council's plan contains conclusions about groundwater availability that are wrong since groundwater use is currently impacting springs and stream flows in Burke County around Waynesboro.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Although most of the Floridan Aquifer in Burke County is not connected to surface water, USGS has mapped aquifer outcrops along Brier Creek near Waynesboro. In outcrop areas, withdrawals from the Floridan Aquifer may effect springs and surface water flows. Future iterations of the Plan could adjust evaluation from a region level to more specific local conditions if deemed a priority in future planning.

**Comment:** The Savannah-Upper Ogeechee Council's plan should fully consider impact of inter-basin transfers on donor basins.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's plan includes a goal that promotes the development of an evaluation process that protects donor basins.

**Savannah-Upper Ogeechee Regional Water Planning Council**  
**Posted January 6, 2012**  
**DRAFT Response to Public Comments on Draft Regional Water Plan**

**Comment:** The Savannah-Upper Ogeechee Council's plan recommendations on page 7-5 regarding drought management are unclear. Suggest Council support for programs similar to the Flint River Drought Protection Act.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** The Savannah-Upper Ogeechee Council's plan draws erroneous conclusions about the role of the Georgia Public Service Commission in utility energy planning and needs to be corrected.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Language in the Council's plan has been changed to clarify the role of the Georgia Public Service Commission.

**Comment:** The Savannah-Upper Ogeechee 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 basin.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** Commenter expressed concern that the Savannah-Upper Ogeechee Council's plan included Management Practice recommendations influenced by EPD that were not supported by Council members

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council unanimously approved the Management Practices in the Council's plan before being submitted to EPD.

**Comment:** The Commenter expressed support for the Savannah-Upper Ogeechee Council's welcoming environment for public comment. The Governor should continue regional water planning. Some future council meetings should be dedicated to presenting information and gathering public input.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Public involvement will remain a key element of the regional planning process.

**Comment:** The Savannah-Upper Ogeechee Council's plan lacks information about future water needs for planned construction of power generating facilities.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Forecasts of water needs for power generation included existing and known planned facilities through 2020. Beyond 2020, the location of power generating facilities is not known.

**Savannah-Upper Ogeechee Regional Water Planning Council**  
**Posted January 6, 2012**  
**DRAFT Response to Public Comments on Draft Regional Water Plan**

**Comment:** Conservation is something that people should make a personal decision whether to do or not do. Conservation should not be the linchpin of our water planning. System interconnection and increased treatment capacity are best.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** The Savannah-Upper Ogeechee Council's plan is missing water conservation measures from the Final Recommendations to the State, though they were discussed by the Council.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's plan identifies water conservation as a priority practice and identifies specific water conservation measures. Recommendations to the State are actions the Council recommends to support implementation of the plan.

**Comment:** The only topic left in the Savannah-Upper Ogeechee Council plan's Final Recommendations to the State concern management of the water in Clark Hill Lake. One could conclude a lot of time was spent on this topic and that is not true.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** While the Savannah-Upper Ogeechee Council spent time discussing inter-basin transfers, the plan only mentions them in Section 1 and the Final Recommendations to the State does not mention this topic.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's discussions on inter-basin transfers resulted in language contained in the second Goal in Section 1 of the plan. Recommendations to the State are actions the Council recommends to support implementation of the plan.

**Comment:** The Commenter expressed concern that enforcement of rules written as a result of the Savannah-Upper Ogeechee Council's plan will be burdensome on local governments.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. 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.

**Comment:** The Savannah-Upper Ogeechee Council's plan should encourage governments that do a good job managing water and waste-water to use water so more water will be returned to the stream.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Many municipalities treat wastewater to a high standard and return to the stream much of the water withdrawn. However, encouraging water use so more water can be returned to the stream does not promote water conservation as a statewide priority water quantity management practice.

**Savannah-Upper Ogeechee Regional Water Planning Council**  
**Posted January 6, 2012**  
**DRAFT Response to Public Comments on Draft Regional Water Plan**

**Comment:** People need to get off this fear of transferring water where you need it. Water is just a natural resource, like wood, natural gas, and others.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** The Savannah-Upper Ogeechee Council needs to start thinking more regionally (not basin regionally) when it comes to water supply, we need more aggressive plans to use what we have and encourage interconnections and regional cooperation.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** The Savannah-Upper Ogeechee Council's plan became much too technical as the process evolved

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. No changes to the plan were recommended.

**Comment:** The Savannah-Upper Ogeechee Council's plan needs to further examine exactly how much water we have compared to what we use. All uses of water, whatever they may be, are a collective drop in the bucket compared to what we have available to us. Let the public know this.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's plan provides information on where water is abundant and where there are shortfalls in instream flows during dry periods. This information can be used in developing long-term water management strategies.

**Comment:** The Savannah-Upper Ogeechee Council's plan should request further effort in regards to how the Corps of Engineers manages the federal reservoirs inside and on our state borders. Drinking water and other public uses must be the first priority.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's plan provides recommendations to the state regarding water management by the Corps of Engineers.

**Comment:** The Savannah-Upper Ogeechee Council should remember that this Council (in their Goals) raised a flag of concern about inter-basin transfers

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. The Council's plan includes language regarding inter-basin transfer language in the second Goal in section 1.

**Comment:** The Savannah-Upper Ogeechee Council's plan is another well documented work of suggestions, guidelines and benchmarks for monitoring. Unclear what agencies will implement. Lacks clear legislative recommendations.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. Sections 7 and 8 of the Council's plan provide information on the implementing entities.

**Savannah-Upper Ogeechee Regional Water Planning Council**  
**Posted January 6, 2012**  
**DRAFT Response to Public Comments on Draft Regional Water Plan**

**Comment:** The Savannah-Upper Ogeechee Council's plan recommendations to "Study Human Impacts on Water Quality" and "Monitor and Address NPS Nutrient Loading" do not appear to be eligible for Clean Water SRF funding.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. GEFA has been removed as a potential funding source for these Management Practices.

**Comment:** The Savannah-Upper Ogeechee Council's plan recommendations to "Monitor Streamflow" and "Conduct Instream Flow Studies" would likely not qualify for GEFA financing.

**Response:** The Savannah-Upper Ogeechee Council discussed this comment. GEFA is identified as a potential responsible party in Table 7.1 only for portions of projects that may be eligible for funding.