



Responses to Comments on:

**Upper Oconee 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

This document provides a summary of comments and responses specific to the Upper Oconee 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

Comment: The Upper Oconee Council should re-examine population forecasts for Barrow, Jackson, Morgan, Oconee and Walton counties in light of 2010 census figures, or local governments should be made aware of shortcomings inaccuracies or limitations of the Plan's forecasts.

Response: The Upper Oconee Council discussed this comment. The Council included 2010 Census data as an addition to Table 4-1 in the Upper Oconee Regional Water Plan. The forecasts will be revisited as part of the 5-year plan update process.

Comment: The Upper Oconee plan's 2010 municipal demand forecast for Athens Clarke County appears high when compared to the County's own forecasts figures.

Response: The Upper Oconee Council discussed this comment. The plan's water demands were calculated using the 2009 USGS Water Use Report (2005 adjusted per capita) and the OPB population projections. Additionally, the plan's demands also included groundwater and self supplied, as well as municipal surface water. The forecasts will be revisited as part of the 5-year plan update process.

DRAFT Response to Public Comments on Draft Regional Water Plan

Comment: The Upper Oconee Council's recommendations do not address recovery of rare species.

Response: The Upper Oconee Council discussed this comment. The plan recommends management practices such as stream buffer protection and comprehensive land use planning that target habitat protection.

Comment: Certain water supply practices should receive lower rankings in favor of water conservation and efficiency measures in the Upper Oconee Council's plan.

Response: The Upper Oconee Council discussed these comments; no action was taken to change the plan.

Comment: The Upper Oconee plan should define conservation pricing as specifically as possible to promote rate structures that promote conservation.

Response: The Upper Oconee Council discussed this comment. While the Council's plan does not strictly define conservation pricing, management practice WC-1 recommends the elimination of declining block rate structures.

Comment: The Upper Oconee plan should include measures to encourage retrofits for water efficiency especially in residential and commercial sectors.

Response: The Upper Oconee Council discussed this comment. The Water Stewardship Act (2010) addresses incentivizing retrofits.

Comment: The Upper Oconee Council should reconsider recommending re-use in light of conservation measures and effects of pharmaceuticals, antibiotics, etc.

Response: The Upper Oconee Council discussed these comments; no action was taken to change the plan.

Comment: The Upper Oconee plan should specifically address inter-basin transfers.

Response: The Upper Oconee 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.

Comment: The Upper Oconee 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 Upper Oconee 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. The Council has recommended any required use of these practices is to only be considered as long-term actions and only after additional stakeholder input as part of the 5-year plan update process.

Comment: Upper Oconee plan should clarify for local utilities the relationship between different sets of practices

Response: The Upper Oconee Council discussed this comment. The Council adjusted plan narrative accordingly

Comment: The Upper Oconee plan should address sediment contribution of dirt roads by referencing "Georgia Better Back Roads" manual.

Response: The Upper Oconee Council discussed this comment. The Council added a reference to "Better back Roads" program.

Comment: The Upper Oconee Supplemental Documents need to include total available water supply for Morgan county and City of Madison's Final Watershed protection plan.

Response: The Upper Oconee Council discussed this comment. Morgan County and City of Madison are included as "self-supplied" in the Morgan County data.