

Public Comment Summary						
ACF Comment Number	Page	Commenter		Council(s) of Interest	General Points (Internal Use only)	Middle Chattahoochee Talking Points
		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.	The Council recognizes this work as a starting point for implementation and supports the continued regional water planning. The Council's understanding of plan updates are in Section 8.2. The Council also had concerns that the baseline surface water availability assessment did not take into account meeting all of the instream water uses as described in Section 3.2
2	13	Alabama Rivers Alliance.	Mitch Reid, Program Director	MCH	1. Recognize regional plans impact Alabama and include neighboring states and all stakeholders in the planning process. 3. Adopt a watershed planning approach 4. Set environmental flows as a baseline parameter.	The Council was concerned about the lack of Alabama input and recognized the limited Alabama input in Section 2.3. The Council recommended more collaboration as part of its recommendations to the State in Section 7.4. 3. The Council recommended creation of Water planning districts and interstate compacts and developed coordinated recommendation with neighboring councils in Section 7.4. The Council discussed instream flows at length.
5	42	Chatt. River Wardon	Roger Martin, Executive Director	MCH	1. Concerns about West Point Lake Interests not in best interest of others in the basin. 2. Council should have based plan on the current RIOP from the USACE using Hec-ResSim model. 3. Several agricultural concerns were noted. 4. Concerned about future Nutrient and phosphorus loading from upstream of basin. 5. Return rates should be monitored. 6. Need for enhanced BMPS for Sedimentation. 6. Questioned lack of gaps. 7. Need to implement proactive water conservation measure. 8. Plans do not have any metrics. Metrics need to be measured annually. 9. Several general comments	The Council discussed the issues raised by this letter at length. The Plan presents numbers based on the RIOP. Nutrient loadings shown in the plan assume current permitted discharges at current permit limits. MCH included recommendations to the State to enhance E&S Efforts. MCH identified lack of guaranteed flows and reservoir levels as "gaps" in addition to increased withdrawals. MCH discussed conservation and this was one of the priority management practices; however the Council intentionally stopped short of mandating measures. Chapter 8 of the plan contains benchmarks.
6	47	City of LaGrange	Mike Criddle, Director of Economic Development	MCH	1. West Point is not recognized for the sport fishing authorization it retains. 2. FERC guidelines should require the use of private reservoirs. 3. Consider a flood study for West Point Lake. 4. Need to differentiate uses and congressional authorized uses. 3. Lack of gap is absurd. 4. RIOP needs to be re-visited by USFWS to examine economic harm to upstream stakeholders. 5. USFWS should study the possible relocation of endangered species. 6. Chattahoochee and Flint should equally share the burden of the 5,000 cfs at the Florida Line. 7. All ACF councils question the 5,000 cfs requirement. 8. EPD should require expansion of sewer systems for building permits in urban areas. 9. During drought conditions, Bartlett's ferry should be used.	The Council extensively discussed authorized reservoir purposes, sharing of water resources, use of private reservoirs, and other issues noted. The Council incorporated consensus items such as recommending additional studies and advocating for water control manual changes.
7	51	Cobb Co.	Stephen D. McCullers, Director	ACF	1. 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 and did not review one set of best management practices that should be applied throughout the state.

9	57	GIEC	Tammy Wyles, Chair	ACF	<p>1. Reconsider the unimpaired flow regime criteria. 2. State should insist begin closing a verified streamflow gap. 3. Suggest plans note that Septic systems and LAS returns will be included in future plan updates.</p>	<p>The Council discussed the surface water availability assessment at length. The Council, in its Recommendations to the State, recommending that the State provide funding for and continue to refine the water resource assessments used in the plan.</p> <p>The MCH Council recognizes that during low flow conditions, flow stored in the Chattahoochee basin may be used to offset flow shortfalls in the Flint. During other flow conditions, flow may be available for storage in the Chattahoochee when flows in the Flint exceed downstream flow requirements. 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> <p>The MCH council encouraged groundwater development, where excess capacity is available and study of aquifer storage and recovery as options to enhance water supplies in the region. While not specifically in the recommended plan, groundwater augmentation of surface flows may have merit in some isolated areas, but the Council believes better management of existing surface water flows is the priority.</p> <p>While no quantity gaps other than increased needs were identified by the surface water assessment, The MCH council believes that the recommended regional plan begins the process of closing the gap through potential additional storage and changes to the USACOE water control manual for federal projects along the Chattahoochee.</p> <p>The MCH council discussed consumptive use at length and specifically recommended studies to determine appropriate water return ratios for septic and land application systems (WW-2). While some recent reports have been conducted, the Council does not believe that adequate studies have been performed to provide a definitive ratio for the seasonal variations and the range of geologic, land use, and vegetative cover conditions throughout the region, but is supportive of refinements to the assessments to reflect better information in the future.</p>
10	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 Council recognizes that during low flow conditions, flow stored in the Chattahoochee basin may be used to offset flow shortfalls in the Flint. During other flow conditions, flow may be available for storage in the Chattahoochee when flows in the Flint exceed downstream flow requirements. 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>

11	75	Ga Water Alliance	Katie Kirkpatrick, Vice-President	ACF	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.	The MCH council encouraged groundwater development, where excess capacity is available and study of aquifer storage and recovery as options to enhance water supplies in the region. While not specifically in the recommended plan, groundwater augmentation of surface flows may have merit in some isolated areas, but the Council believes better management of existing surface water flows is the priority.
12	80 (and 250)	Ga Water Coalition	-	ACF	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.	While no quantity gaps other than increased needs were identified by the surface water assessment, The MCH council believes that the recommended regional plan begins the process of closing the gap through potential additional storage and changes to the USACOE water control manual for federal projects along the Chattahoochee.
13	96	Metro Dist.	Boyd Austin, Chairman	ACF	LFO - State needs to implement Council's recommendation to improve water use efficiency and high priority recommendations made by the Council. 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.	MCH recommended conservation rates when refinancing, protective nutrient criteria, and recognizes the congressionally authorized navigation purpose.
14	110	M.C. Wtr Coal.	James Phillips, President	ACF	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.	MCH has discussed desires for flows and levels as suggested at length.

15	116	S. Alliance Clean Energy	Sara Barczak	ACF	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.	MCH Council has recognized that water needs for future energy production requires additional study in the future.
16	145	Nature Conservancy	Shelly Lakly, Executive Director	ACF	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 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.	The MCH council recommended further water quality studies and refinement of the water assessments conducted for future plan updates. The MCH council discussed water conservation and recommended Tier 1 and Tier 2, and encouraged returns to the river for major (greater than 1 mgd) dischargers. The MCH plan calls for study of additional storage, but focuses on better management of existing storage as the preferred priority.
17	151	Tri Rivers	Billy Turner	ACF	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.	MCH noted the need for improved information regarding projected water needs in the future. MCH also recommended enhanced water quality monitoring for future refinement of the resource assessments, including the watershed models. The noted withdrawal and discharge are included in the counties in the LFO and appear in the LFO plan.

18	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 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.</p>	<p>MCH recommended enhanced water quality monitoring for future refinement of the resource assessments, including the watershed models. MCH discussed many of the issues listed at length in crafting the plan.</p>
19	219	River Keepers	Sally Bethea	ACF	<p>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.</p>	<p>MCH noted many of the same issues regarding the resource assessments.</p>
20	227	U.C. River Keeper	Laura Hart, Water Policy Director	MCH	<p>Series of comments relate to MCH.</p>	<p>1. The Council discussed assumptions regarding the availability of Lake Lanier for water supply and made clear in the Plan that the 1989 Water Control Plan and the current RIOP are both inadequate. It is the Council's expectation that the revised Master Control manual and new IOP will put forth significant operational changes contemplated to address gaps. 2. The council discussed instream flow assumptions at length. The Council, in its recommendations to the state, encouraged State and Federal Agencies to reevaluate the scientific justification for required minimum flows and funding for additional resource assessments. Specific comments on the resource assessments and the state's responsibilities under the Clean Water Act should have been directed to EPD during its comment period on Resource Assessments. 3. The Council reviewed extensive technical materials regarding forecasting future water resource needs. The Council members were fully committed to making the best use of the best information available in developing these forecasts. The Council recommended, however, on page 7-15 that EPD designate task forces to develop improved water use forecasts that could be used in future updates of this plan. 4. The Council reviewed model assumptions that showed no gaps under current conditions. The Council was clear that other gaps for other uses remain due to the inability of the current basin operating plan (RIOP) to meet instream uses and the impacts to those uses which have occurred as detailed on page 3-10. The Council recommended that the legislature provide funding for ongoing additional data collection and the continued refinement of water resource assessments used in the development of the Plan. 5. The Council does support implementation of water conservation practices and included water conservation recommendations for all users in Section 6 of the plan. The plan also recommends benchmarks for water management practices such as Conservation in Section 8.</p>

21	236	West Point Lake Coal.	Dick Timmerberg, West Point Lake Coalition	MCH	Series of comments relate to MCH.	The MCH Council took exception to the surface water availability assessment as the current federal operating rules do not fully support all of the desired water resources needs, particularly flows at certain key river locations and reservoir levels. The MCH Council extensively discussed authorized reservoir purposes, sharing of water resources, use of private reservoirs, and other issues noted, and incorporated consensus items such as recommending additional studies and advocating for water control manual changes.
22	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 are also considered by DCA during developments of regional impact reviews. The Council discussed but did not make a recommendation for additional or revised classifications of waters within its boundaries. The MCH council discussed implementation of additional stormwater management practices in its deliberations. The council recommendations included several management practices in its plan, including two practices related to improving/increasing stream buffers, requiring adoption of the Georgia Stormwater Management manual to reduce nonpoint source pollution, enhancing best management practice utilization, and improving water quality monitoring to provide more data on conditions. The Council devoted a significant amount of its time discussing the appropriate balance of requirement versus encouragement for each of the recommended practices.
23	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.
27	265	Indian H. NA	Brad Moore	MCH	1. Concerned about the projection for increased nutrient levels coming from metro Atlanta point sources over the next 10 years.	The MCH council is concerned with nutrient levels and recommended additional water quality monitoring as suggested and recommended nutrient criteria be established for all areas. The MCH Council also recommended the continuing refinement of the resource assessments to enable better permitting and decision making in the future.
28	271	-	Wm. Moore	MCH	Commented that MCH does not appear to be negatively impacted by Metropolitan North Georgia Water Planning District	The MCH Council took exception to the surface water availability assessment as the current federal operating rules do not fully support all of the desired water resources needs, particularly flows at certain key river locations and reservoir levels.
32	-	-	Ken Clark	MCH	Copy of a proposal to study the building of Kinchafoonee for water supply	The MCH Council recommended that additional storage in the ACF system be studied and implemented.