

Section 11: STATE AND REGIONAL POLICY RECOMMENDATIONS

This Section focuses on State and regional policy recommendations to further implementation of water supply development and water conservation practices in the Metro Water District. These recommendations are intended for State agencies, and require no action on the part of local governments or local water providers. Implementation of these policy recommendations is intended to advance the progress towards addressing integrated water resources protection within the Metro Water District. The recommendations identify actions to be taken, the agency to lead the action, and the year for the action to begin is shown in parentheses.

POST-2035 WATER SUPPLY SOURCE PLANNING

Although this Water Supply and Water Conservation Management Plan provides for supply sources and facilities to meet the 2035 forecasted demands, planning for supply sources beyond 2035 will need to continue within the planning horizon. The Metro Water District should continue to facilitate regional water supply source planning through the existing Technical Coordinating Committee or through a sub-committee of that group. The TCC or sub-committee will be charged with identifying and advocating future water supply sources in the Metro Water District.

- Metro Water District staff should facilitate ongoing discussions on post-2035 water supply planning. (ongoing)

FACILITATE NEW WATER SUPPLY SOURCES

This Water Supply and Water Conservation Management Plan outlines several planned and potential water supply sources critical to meeting future water demands and providing needed water supply reliability within the Metro Water District. The State has recently recognized the importance of reservoir and water supply projects with the Water Conservation and Drought Relief Act, signed into law in May 2008. The law facilitates new water supplies by bringing State agencies together and providing State funding assistance for projects. The law tasks Georgia EPD with expediting permitting related to new reservoir applications and tasks the Georgia Environmental Facilities Authority (GEFA) with providing financial assistance for reservoir and water supply projects. The following recommendations should be considered by GEFA and Georgia EPD related to facilitating new water supply sources for the Metro Water District:

- Continue to financially support the construction of needed water supply sources through GEFA and other Federal and State funding sources. (ongoing)

FACILITATE WATER PERMITTING

The law creating the Metro Water District (O.C.G.A. §12-5-571) grants the Georgia EPD broad powers for issuing water withdrawal permits to water providers in the Metro Water District in accordance with the Water Supply and Water Conservation Management Plan. Regulatory permitting of water withdrawals as well as water treatment facility expansion is crucial to the implementation of the Plan.

Currently, water withdrawal permits are handled by the Water Withdrawal Permitting Program of the Georgia EPD's Watershed Protection Branch. The Drinking Water Permitting and Engineering Program is under the same branch and issues permits for public water systems, including permits for the expansion or modification of existing public water treatment plants. In addition, several programs within the Watershed Protection Branch regulate wastewater systems. While consolidation of these permits may not be practical, Georgia EPD should continue its current efforts to improve coordination and communication among the groups handling the permits in order to expedite projects included in the Water Supply and Water Conservation Management Plan. In accordance with HB342, a multi-agency Water Supply Technical Assistance Program has been established to assist communities in developing water supply projects. Recommendations for coordination and communication include the following:

- Consolidate permit cycle. The water withdrawal permit is typically issued for a ten-year period; the permit to operate treatment facilities is also typically issued for a ten-year period. It is recommended that the permit cycles for both withdrawal and treatment/operation/plant expansion be consolidated into the same cycle on the basis of river basin (same as the wastewater permits), in order to revise and refine these permits based on the updated needs in the particular basin. (2009 – 2011)
- Consolidate and standardize reporting. Reporting is required for several regulatory programs, such as the water conservation progress report. These reports can be simplified to meet multiple requirements. Revisions to permit reporting could include web-based reporting or other recommendations resulting from the Georgia Association of Water Professionals (GAWP) Watershed Streamlining Task Force. (2009 – 2010)

ENCOURAGE CONSERVATION THROUGH STATE LEGISLATION

The following State legislation should be considered to support local water conservation programs:

- Adjust the State plumbing code to reflect market maturity for higher efficiency fixtures, such as 1.28 gallon per flush HET toilets and 0.5 gallon per flush high-efficiency urinals for all new development and redevelopment projects. (2015 – 2035)
- Return local home rule to local water providers for establishing drought restrictions based on their local conditions and understanding of their water systems.
- Offer state tax credits for commercial and industrial retrofit of toilets and urinals, coin operated washers, front loading washing machines, water efficient dishwashers, instant hot water heaters, drip irrigation and advanced irrigation controllers.
- Prohibit homeowners associations (HOAs) from requiring water intensive landscaping or irrigation.

SMALL WATER WITHDRAWALS

During the recent drought conditions, small surface water withdrawals and wells have become more common to provide irrigation water to avoid drought irrigation restrictions. The cumulative impact of small surface water withdrawals and groundwater withdrawals has the potential to deplete municipal water resources. In the Metro Water District, there is a strong correlation between groundwater and surface water flows, therefore groundwater use depletes base flows in streams. Since the quantity of water withdrawn under 100,000 gpd is not required to be reported, it is difficult to quantify the impact on instream and downstream water users. The Georgia EPD should study the following policy changes and make the appropriate recommendations to the Georgia General Assembly:

- Require all withdrawals in the Metro Water District to adhere to the same drought restrictions as those on public water supplies.
- Consider requiring permits for withdrawals less than 100,000 gpd within the Metro Water District.

COMPREHENSIVE LAND USE PLAN COORDINATION

Georgia Department of Community Affairs (Georgia DCA) is responsible for overseeing required Comprehensive Land Use Plans and implementation of Part V Environmental Planning Criteria under the Georgia Planning Act.

Georgia DCA currently reviews Comprehensive Land Use Plans (CLUPs) for compliance with the Metro Water District Water Supply and Water Conservation Management Plan. The local CLUPs direct where growth will occur locally and should be coordinated with local water providers. Additionally, Georgia DCA through the CLUP review process should support protection of source water supply watersheds.

The Part V Environmental Planning Criteria include important protections for source water supply watersheds. These criteria were recently updated by Georgia DCA and Georgia EPD. Reviews of the Part V Environmental Planning Criteria will need to be more thorough as local governments have several options available for compliance with the updated criteria.

The following recommendations should be considered by Georgia DCA related to required Comprehensive Land Use Plan reviews:

- The new Comprehensive Land Use Plan review audit checklist should be updated as needed to encourage coordination between land use planning and water supply planning in accordance with this Water Supply and Water Conservation Management Plan. (2009 - 2010)
- Review and support source water supply watershed protection as outlined in Part V Environmental Planning Criteria. (2009 and ongoing)

WATER CONSERVATION PROGRAM EVALUATION

The water conservation program is a critical element of this regional Water Supply and Water Conservation Management Plan. Future water supplies and treatment capacities contained within this Water Supply and Water Conservation Management Plan are based on attaining the

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forecasted benefits of this conservation program on a regional scale. Currently there are several practical limitations to measuring progress such as inconsistent terminology, lack of available data and the need to identify practical ways of collecting data. Periodically, it will be important to assess the progress and benefit of the water conservation program. Recommendations throughout this Plan are intended to address the existing limitations to the degree practicable to develop a sound method of measuring regional progress. Examples include the use of the IWA/AWWA software in Action Item 5.6 to assess water loss following a standardized methodology.

The Metro Water District should work through the Technical Coordinating Committee and, if necessary, a sub-committee of the TCC to discuss options for collecting data and measuring progress. The Metro Water District should consider the following:

- Metro Water District staff should facilitate discussions to establish terminology and methodology for measuring progress of the water conservation program. (2009 - 2011)