

## Section 13: IMPLEMENTATION PLAN

### INTRODUCTION

The implementation actions for the Water Supply and Conservation Management Plan are a blueprint for State, regional and local water providers in the 15-county Metro Water District to follow. Performing these actions will lead towards achieving the goals established for the Water Supply and Water Conservation Management Plan.

### ROLES

The Water Supply and Water Conservation Management Plan involves participation by citizens and many levels of government for implementation. The broad roles for these are summarized below:

#### Local Jurisdictions

- Own and operate local water systems that manage water supply, treatment, distribution and water conservation programs;
- Plan and construct water supply infrastructure for water supply (Note: projects required pursuant to a federal or State court order will take precedence over the recommendations contained in this plan);
- Participate in the Metro Water District including coordination with the Wastewater Management Plan and Watershed Management Plan;
- Implement programs to improve water system interconnections; and
- Participate in regional efforts for water resources management related to implementation of this Plan.

#### Metro Water District

- Promote inter-jurisdictional collaboration for water resources management;
- Serve as a forum and clearinghouse for regional issues, such as water conservation;
- Present a regional voice for water resources management;
- Provide local jurisdictions with support and guidance for implementing this Water Supply and Water Conservation Management Plan; and
- Monitor development of the Comprehensive Statewide Water Management Plan and its impact on the Metro Water District members.

### Georgia Environmental Protection Division

- Issue water withdrawal permits in accordance with this Water Supply and Water Conservation Management Plan;
- Continue regulatory functions over water supply; and
- Support regional planning.

### Georgia Environmental Facilities Authority

- Support the Water Supply and Water Conservation Management Plan through increased funding participation.

## IMPLEMENTATION SCHEDULES

Three separate implementation schedules are included in this Section, one for local water providers, one for the Metro Water District, and one for State agencies. It should be noted that local water providers are only responsible for implementing management measures identified on the local implementation schedule and are not responsible for Metro Water District or State-level tasks. Local water providers should use this implementation schedule in combination with Appendix B, County-Level Summaries, which provides greater detail on new water supply development and new facility construction or expansion projects. The implementation schedules in this Section outline the programmatic requirements of this Water Supply and Water Conservation Management Plan.

The reference page numbers provide the location of the full description of each measure in the Water Supply and Water Conservation Management Plan where additional implementation guidance may be found. New program implementation or creation of a program is indicated differently than ongoing implementation in the implementation schedule. The distinction provides a quick snapshot for the level of intensity of implementation on an annual basis.

Tasks in the implementation schedule are outlined individually for the first few years of the Water Supply and Water Conservation Management Plan, considered the short-term. The action items for implementation in the calendar years 2012 to 2015 are considered medium-term and the action items for the 2015 to 2035 time-frame are considered long-term recommendations. The schedule for medium-term and long-term tasks may be adjusted during updates every 5 years, following an adaptive management approach.

TABLE 13-1  
Local Water Provider Implementation Schedule

| Category  | #    | Implementation Action Item   | 2009       | 2010       | 2011       | 2012 - 2015 | 2015 - 2035 | Ref. Pages    |
|---|------|--|------------|------------|------------|-------------|-------------|---------------|
| Water Conservation Program  | 5.1  | Conservation pricing (Irrigation meter pricing established by 2010)  | .....      | ██████████ | .....      | .....       | .....       | 5-2 to 5-4    |
|   | 5.2  | Replace older, inefficient plumbing fixtures   | ██████████ | .....      | .....      | ██████████  | .....       | 5-5 to 5-6    |
|   | 5.3  | Pre-rinse spray valve retrofit education program   | .....      | .....      | .....      | .....       | .....       | 5-7 to 5-8    |
|   | 5.4  | Rain sensor shut-off switches on irrigation systems  | .....      | .....      | .....      | .....       | .....       | 5-9           |
|   | 5.5  | Require sub-unit meters in new multi-family buildings  | .....      | .....      | .....      | .....       | .....       | 5-10          |
|   | 5.6  | Assess and reduce water system leakage   | .....      | .....      | .....      | .....       | .....       | 5-11 to 5-13  |
|   | 5.7  | Conduct residential water audits   | .....      | .....      | .....      | .....       | .....       | 5-14          |
|   | 5.8  | Distribute low-flow retrofit kits to residential users   | .....      | .....      | .....      | .....       | .....       | 5-15 to 5-16  |
|   | 5.9  | Conduct commercial water audits  | .....      | .....      | .....      | .....       | .....       | 5-17 to 5-18  |
|   | 5.10 | Implement education and public awareness plan (component of action item 12.1)  | .....      | .....      | .....      | .....       | .....       | 5-19 to 5-20  |
|   | 5.11 | Install HETs and high efficiency urinals in government buildings   | .....      | .....      | .....      | .....       | ██████████  | 5-21          |
|   | 5.12 | Require car washes to recycle water  | .....      | ██████████ | .....      | .....       | .....       | 5-22          |
| Reuse   | 7.1  | Return reclaimed water to Lakes Lanier and Allatoona for future indirect potable reuse                                     | ██████████ | ██████████ | ██████████ | ██████████  | ██████████  | 7-8           |
| Planned Water Supply Facilities   | 8.1  | Construction of 6 new water supply reservoirs  | ██████████ | ██████████ | ██████████ | ██████████  | ██████████  | 8-2           |
|   | 8.2  | Construct 6 new water treatment plants   | ██████████ | ██████████ | ██████████ | ██████████  | ██████████  | 8-3           |
|   | 8.3  | Expand 28 existing water treatment plants  | ██████████ | ██████████ | ██████████ | ██████████  | ██████████  | 8-3 to 8-4    |
| Local Planning Recommendations  | 9.1  | Develop local water master plans, update every 5 years   | .....      | .....      | .....      | .....       | .....       | 9-2 to 9-4    |
|   | 9.2  | Develop or update local emergency water plans  | .....      | .....      | .....      | .....       | .....       | 9-5 to 9-8    |
|   | 9.3  | Source water supply watershed protection   | ██████████ | .....      | .....      | .....       | .....       | 9-9 to 9-10   |
|   | 9.4  | Water system asset management  | ██████████ | ██████████ | ██████████ | ██████████  | .....       | 9-11 to 9-12  |
| Education and Public Awareness  | 12.1 | Develop and implement a local education and public awareness program (action item 5.10 is a component of this action item) | .....      | .....      | .....      | .....       | .....       | 12-8 to 12-10 |
| ██████████ Active Implementation <span style="float: right;">..... Ongoing Implementation/ Program Maintenance</span> |      |  |            |            |            |             |             |               |

Note: Additional implementation items related to each county are included in Appendix B, County Level Summaries.

TABLE 13-2  
Regional Agency Implementation Schedule

| Category   | Implementation Action Item   | 2009  | 2010  | 2011  | 2012 - 2015 | 2015 - 2035 | Ref. Pages   |
|--|--|-------|-------|-------|-------------|-------------|--------------|
| Post-2035 Water Supply Planning  | Facilitate post-2035 water supply planning with the TCC  | ..... | ..... | ..... | .....       | .....       | 11-1         |
| Water Conservation Program Evaluation  | Continue discussions on evaluating a method for evaluating the water conservation program                                    | ..... | ..... | ..... | .....       | .....       | 11-4         |
| Program Assistance   | Assist with program design, coordinate implementation as needed, monitor and report compliance and revise program as needed. | ..... | ..... | ..... | .....       | .....       |              |
| Education and Public Awareness   | Continue to support education efforts with regional education programs   | ..... | ..... | ..... | .....       | .....       | 12-6 to 12-8 |
|  | Investigate enhancing existing water conservation messages with new recommended topics                                       | ..... | ..... | ..... | .....       | .....       | 12-6 to 12-7 |
| <span style="background-color: black; color: black;">██████████</span> Active Implementation ..... Ongoing Implementation/ Program Maintenance |  |       |       |       |             |             |              |

TABLE 13-3  
State Agency Implementation Schedule

| Category  | Implementation Action Item  | 2009  | 2010  | 2011  | 2012 - 2015 | 2015 - 2035 | Ref. Pages |
|---|---|-------|-------|-------|-------------|-------------|------------|
| <b>State of Georgia</b>   |   |       |       |       |             |             |            |
| Facilitate New Water Supply Sources   | Financially support the construction of needed water supplies through GEFA and other State and Federal funding sources  | ..... | ..... | ..... | .....       | .....       | 11-1       |
| Encourage Conservation  | 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 | ..... | ..... | ..... | .....       | ■           | 11-2       |
|   | Return local home rule for drought water restrictions stricter than State drought response  | ..... | ■     | ■     | .....       | .....       | 11-2       |
|   | Offer state tax credits for commercial and industrial retrofit with water-efficient fixtures  | ..... | ■     | ■     | .....       | .....       | 11-2       |
|   | Prohibit HOAs from requiring water intensive landscaping or irrigation  | ..... | ■     | ■     | .....       | .....       | 11-2       |
| <b>Georgia Environmental Protection Division (Georgia EPD)</b>  |   |       |       |       |             |             |            |
| Facilitate Water Permitting   | Consolidate permit cycles   | ■     | ■     | ..... | .....       | .....       | 11-2       |
|   | Consolidate and standardize reporting   | ■     | ■     | ..... | .....       | .....       | 11-2       |
| Small Water Withdrawals   | Require all withdrawals in the Metro Water District to adhere to the same drought restrictions as those on public water supplies  | ■     | ■     | ..... | .....       | .....       | 11-3       |
| <b>Georgia Department of Community Affairs (Georgia DCA)</b>  |   |       |       |       |             |             |            |
| Comprehensive Land Use Coordination   | Update the Comprehensive Land Use Plan audit checklist to be consistent with this plan  | ■     | ■     | ..... | .....       | .....       | 11-3       |
|   | Review and support source water supply protection as outlined in the Part V Environmental Planning Criteria   | ■     | ..... | ..... | .....       | .....       | 11-3       |
| <span style="display: inline-block; width: 15px; height: 10px; background-color: black; vertical-align: middle;"></span> Active Implementation <span style="display: inline-block; width: 15px; border-bottom: 1px dotted black; vertical-align: middle;"></span> Ongoing Implementation/ Program Maintenance |   |       |       |       |             |             |            |

## IMPLEMENTATION COSTS

Cost estimates for the Water Supply and Water Conservation Management Plan are subdivided into three distinct categories: the water conservation measures, infrastructure costs, and programmatic expenses. These cost estimates are shown in Table 13-5.

The water conservation implementation costs are an output of the DSS model used to forecast the water savings, and subsequent monetary savings, of the selected water conservation program. These costs reflect the cost to the local water provider in establishing and managing these water conservation programs as well as the cost to the water customer of upgrading or installing technologies. As with estimated water savings, the conservation measure implementation costs will vary based on the specific conditions within each county.

Water infrastructure costs include water supply reservoirs, new water treatment plants and expansion of existing water treatment facilities.

The cost of reservoir storage is variable and site-specific, making it difficult to provide typical costs for reservoir projects. The costs can vary significantly depending on location, land and relocation costs, siting and permitting, engineering requirements, environmental impacts and mitigation, difficulty of construction, and the type of reservoir constructed (on-stream vs. pumped storage).

A recent report by GEFA “Georgia Inventory and Survey of Feasible Sites for Water Supply Reservoirs” dated October 31, 2008 estimated reservoir cost indicated costs ranging approximately 4 to 10 million dollars per MGD. Using this range, an estimated cost of the proposed reservoirs would be \$824 million. A telephone survey in March 2009 by Metro Water District staff to local water systems to obtain costs for recently constructed reservoirs and proposed reservoirs in or near the Metro Water District showed a range from a low of 0.64 million dollars per MGD to a high of 7.5 million dollars per MGD, with an average cost per MGD of 2.42 million dollars. Using the actual estimates available from this survey and a unit cost of 4 million dollars per MGD where project estimates were not available, the total cost estimate of the proposed reservoirs would be \$389 million dollars. This range is included in the Table 13-4 with the higher of the range included in the total.

National information was used for estimating the costs of treatment plant facilities, both for new construction and expansions of existing plants, which reflects the actual costs for dozens of facilities constructed throughout the U.S. Different unit costs were used for plants categorized as small or large. The basis for water treatment infrastructure costs is provided in Table 13-4.

**TABLE 13-4**  
**Unit Cost Estimates for Water Supply Treatment Facilities**

| Type of Project  |       | Cost per MGD of Capacity<br>(in Million \$) |
|------------------|-------|---|
| New Construction | Large | \$4   |
|                  | Small | \$8   |
| Expansions       | Large | \$4   |
|                  | Small | \$6   |

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Infrastructure costs were calculated by multiplying the unit costs and the county-level facility plans outlined in Appendix B of the Water Supply and Water Conservation Management Plan.

Programmatic expenses such as local planning, state and regional policy, and educational program costs were developed based on cost data provided by communities within the Metro Water District and the Metropolitan North Georgia Water Planning District. The programmatic costs also vary based on population, level of service, local challenges, and other parameters. As these costs are more region specific, local costs were used, as opposed to national costs.

**TABLE 13-5**  
**Estimated Annual Water Supply and Water Conservation Management Plan Implementation Cost by Program Category**

| Action Number  | Description   | Estimated Costs (Note 1)       |
|--|---|--------------------------------|
| <b>5.0 Water Conservation Program (Note 2)</b>                 |   | <b>Cost in million dollars</b> |
| 5.1  | Conservation pricing  | \$48.6                         |
| 5.2  | Replace older, inefficient plumbing fixtures                        | \$131.6                        |
| 5.3  | Pre-rinse spray valve education program                             | \$9.6                          |
| 5.4  | Rain sensor shut-off switches on new irrigation systems             | \$21.7                         |
| 5.5  | Require sub-meters in new multi-family buildings                    | \$102.5                        |
| 5.6  | Assess and reduce water system leakage                              | \$161.8                        |
| 5.7  | Conduct residential water audits                                    | \$4.2                          |
| 5.8  | Distribute low-flow retrofit kits to residential users              | \$19.5                         |
| 5.9  | Conduct commercial water audits                                     | \$39.6                         |
| 5.10   | Implement education and public awareness plan                       | \$36.2                         |
| 5.11   | Install high efficiency toilets and urinals in government buildings | \$16.6                         |
| 5.12   | Require car washes to recycle water                                 | \$3.3                          |
| <b>SUB-TOTAL</b>   |   | <b>\$595.3</b>                 |
| <b>8.0 Planned Water Supply Facilities (Note 3)</b>            |   | <b>Cost in million dollars</b> |
| 8.1  | Construct six new water supply reservoirs                           | \$389 - \$824                  |
| 8.2  | Construct six new water treatment plants                            | \$308                          |
| 8.3  | Upgrade 28 existing water treatment plants                          | \$2,272                        |
| <b>SUB-TOTAL</b>   |   | <b>\$3,403</b>                 |
| <b>9.0 Local Water Planning (Note 3)</b>                       |   | <b>Cost in million dollars</b> |
| 9.1  | Develop local master plans  | \$2.25                         |
| 9.2  | Develop local emergency plans                                       | \$1.58                         |
| 9.3  | Source water supply watershed protection                            | \$1.35                         |
| 9.4  | Water system asset management                                       | \$1,490                        |
| <b>SUB-TOTAL</b>   |   | <b>\$1,495</b>                 |
| <b>11.0 State and Regional Policy Recommendations (Note 3)</b> |   | <b>Cost in million dollars</b> |
| 11   | State and Regional Policy   | \$0.20                         |
| <b>12.0 Education and Public Awareness (Note 3)</b>            |   | <b>Cost in million dollars</b> |
| 12.1   | Local education program   | \$2.3                          |
| 12.1   | Regional education program  | \$1.2                          |
| <b>SUB-TOTAL</b>   |   | <b>\$3.5</b>                   |
| <b>Totals</b>  |   |                                |
| Local water providers and governments                          |   | \$4,672                        |
| Metro Water District   |   | \$1.3                          |
| Georgia EPD  |   | \$0.1                          |
| <b>TOTAL</b>   |   | <b>\$4,673.8</b>               |

Notes:

1. Costs for planning period based on local and regional project cost data.
2. Water conservation costs based on the DSS model and includes both utility and community cost, presented in year 2008 dollars.
3. Based on year 2008 dollars.

### IMPLEMENTATION FUNDING

Successful implementation of the Metro Water District Water Supply and Water Conservation Management Plan hinges on each local water provider's ability to fund the implementation actions. All local governments should develop a stable funding mechanism that will provide for complete implementation of the Water Supply and Water Conservation Management Plan. The funding methods outlined in this Section are divided into primary and secondary funding methods. The only primary funding method appropriate for funding implementation of the required action items is water rates. There are a number of secondary funding methods, however, that may help augment primary funding methods for specific projects or programs. A blend of funding methods is recommended to support implementation of the Metro Water District Water Supply and Water Conservation Management Plan.

### WATER RATES

Like other public utilities, local water providers charge customers for services associated with water capacity, production, and distribution. Water rates provide a stable and dedicated revenue source for implementation of the Action Items in this Water Supply and Water Conservation Management Plan. Water rates should be based on a local rate study and designed to provide a sufficient revenue stream to support program costs and facility maintenance.

### GENERAL APPROPRIATIONS (GENERAL FUND)

Revenues from local taxes typically comprise the "General Fund" which funds most activities performed by local governments. Annually, the local government divides the general fund based on local priorities into budgets for police, fire, transportation and other activities. The General Fund is an existing funding source that may be used to augment local water rates for special projects, such as development of a new water supply or construction of a treatment facility. The General Fund is not commonly used to fund water supply and water conservation programs in the Metro Water District.

### LOANS/BONDS

Loans and bonds allow immediate expenditures on water supply and treatment projects beyond readily available local funds. Bonds are not a revenue source, but rather are a means of borrowing money for a specific purpose. Funds are typically paid over a 15-year to 20-year period with interest charges, similar to a home mortgage. Despite interest charges, loans and bonds are often a financially sound method for funding capital improvement projects. For some capital improvement projects, such as water treatment plant upgrades and water line rehabilitation, the upfront expenditure may be less than the long-term expense of damage or the cost of water loss due to procrastination.

Typically loans and bonds are used for capital improvement projects that cannot wait until local funds are available; loans and bonds are not recommended for routine operations. Repayment schedules for loans and bonds can be developed to smooth out peaks and valleys in revenue requirements and thus reduce the need for sporadic large rate increases.

**General Obligation and Revenue Bonds** – Debt financing of capital projects can be accomplished by issuing general obligation bonds, revenue bonds, or a combination of the two. General obligation bonds are issued based on the "taxing powers" of the local government therefore no assets are required as collateral. Revenue bonds are issued based on revenues generated by a specific revenue-generating entity such as special service fees, special assessments, or water rates. Because revenue bonds typically exclude property tax revenues, the interest rate on revenue bonds is typically higher.

Bonds require voter approval in a referendum and are subject to local administrative policy regarding debt ceilings. Most bonds are financed over a 15-year period with interest payments based on the community's bond rating.

**Georgia Environmental Facilities Authority Loans** – The Georgia Environmental Facilities Authority (GEFA) provides low-interest state loans to assist local governments across the state with a number of environmental-related efforts. Loan programs administered by GEFA cover water, wastewater, solid waste, and land conservation projects. Low interest loans are available for a maximum timeframe of 20 years with population-based limits on loan amounts. GEFA loans require that a community has a good payment history for previous GEFA loans, the project has identified and secured 100% of the total project funds, and the minimum debt service coverage is 105%. There are two GEFA loans capable of supporting implementation of this Water Supply and Water Conservation Management Plan; the Georgia Fund and the Drinking Water State Revolving Fund.

- The Georgia Fund is a state loan program administered through GEFA for water, wastewater and solid waste infrastructure projects. The Georgia Fund provides loans to local governments for projects such as water treatment plants, water and sewer lines, pumping stations, wells, water storage tanks and water meters.
- The Drinking Water State Revolving Fund (DWSRF) is a federal loan program administered by GEFA for drinking water infrastructure projects such as, the implementation of security measures, enhanced filtration/disinfection treatment, complying with standards and regulations, rehabilitating aging infrastructure and developing water supply sources.

Communities in the Metro Water District that apply for a GEFA loan must demonstrate through a Georgia EPD audit that they are in compliance with this Water Supply and Water Conservation Management Plan, as well as the Wastewater Management Plan and the Watershed Management Plan.

**WaterFirst** – Although typically considered a voluntary recognition program, communities designated by the Georgia DCA as “WaterFirst” communities receive discounts on GEFA loan interest rates. The WaterFirst Community Program is a voluntary partnership sponsored by the Georgia Department of Community Affairs (Georgia DCA) to increase the quality of life in communities through the wise management and protection of water resources. The award program recognizes local governments that make the connection between land use and water quality, and requires thinking beyond political boundaries to recognize the inextricable links created by shared water resources. Becoming a WaterFirst community demonstrates the desire to be responsible stewards of water resources for both environmental and economic benefits today and in the future.

### SERVICE FEES

Local governments have the authority to establish special taxes or service fees to address specific local challenges. Service fees include SPLOST funds, impact fees, special assessments/tax districts, in-lieu of construction fees, and mitigation banks as outlined below.

**SPLOST Funds** – A Special Purpose Local Option Sales Tax (SPLOST) can be voted on and approved by communities for the purpose of funding the building and maintenance of public facilities. Cities and counties are allowed to add up to a 1% sales tax levied against the sale of goods and services with a SPLOST. A SPLOST is recommended by an elected body and voted upon by residents generally during a scheduled election. A SPLOST expires at the end of six years. If additional funds are still needed, they must be voted upon and approved again by the citizens of the community. Counties and school

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systems are required to provide an independent accountants' report, examining the way the funds were allocated and verify that the system receiving the funds managed those funds appropriately. SPLOST revenues are generated from sales tax versus property tax, therefore are attractive in communities with significant commercial centers or high tourism rates. SPLOST funds are often helpful for large, community-supported capital projects such as the construction of a new drinking water supply reservoir and/or water treatment plant.

**Development Impact Fees** – Local governments may legally assess new development projects an impact fee within a proposed local water supply service area. The impact fee is calculated based on expenses incurred to provide the additional public capacity needed to serve the new growth and development and not based on the benefits received. Development impact fees to pay for water supply projects are not common in Georgia, because the burden of proof is on the local government to accurately demonstrate the cost of the impact.

Development impact fees related to local services, including tap fees and/or plan review fees, are common in the Metro Water District. These are generally one-time fees with revenues used specifically to fund salaries for personnel needed to perform the reviews and inspections required for the new development projects. These fees may be paid directly to the local water provider or to the local government depending on the plan review process for each community.

**Community Improvement Districts (CIDs)** – A unit of government with the power to provide governmental services and facilities. CIDs are similar to authorities that are often created by special tax districts. The benefit of the CID is that they may issue tax-exempt special assessment bonds to finance facilities that provide essential governmental functions, such as water supply- and water conservation-related projects. The debt is supported by the assessment power of the CID and not by the local government. CIDs are often used to support economic development activities.

**In-Lieu Construction Fees** – Local governments may elect to construct larger regional drinking water treatment facilities that provide benefit to new development areas as well as existing areas through a local Capital Improvement Plan. If regional drinking water treatment facilities are designed to handle supplies to new developments, local governments may charge developers an in-lieu fee for their portion of the drinking water treatment capacity. Alternatively, developers may pay a connection fee to cover the cost of extending drinking water supply infrastructure to the development. This strategy may support economic development, especially in redevelopment and infill development areas where drinking water supply requirements are hard to address on an individual lot basis.

### GRANTS

A grant is a form of federal or state financial aid that does not need to be repaid and is typically based on demonstrated need. Grants typically require a local match but are a good way to leverage existing funds. While grants are helpful to extend locally-available funds, they typically are awarded on a competitive basis and involve a long lead time to secure funds. Most grants will not fund completed projects.

**Georgia Water Supply Competitive Grant Program** – GEFA will distribute \$40 million in the State of Georgia as grant funds to support water supply and reservoir projects to make supplies more resistant to periods of drought. These funds are intended to augment the GEFA loan programs. Communities must be a “Qualified Local Government” with Georgia DCA, have a DCA-certified Service Delivery

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Strategy, and within the Metro Water District demonstrate compliance with the Water Supply and Water Conservation Management Plan, Wastewater Management Plan, and Watershed Management Plan.

**Community Development Block Grants (CDBG)** – The CDBG grant program provides funding for projects that substantially benefit low and moderate income persons. Eligible water-related projects could include waterline replacement, additional water tank storage, water meter calibration and replacement, water conservation retrofit assistance, and other projects with a distinct benefit to low and moderate income persons. CDBG funds are distributed within the Metro Water District in two different manners depending on the county.

- **CDBG Entitlement Communities** receive their funds directly from the US Department of Housing and Urban Development (HUD). Jurisdictions in the Metro Water District that are currently entitlement communities include; Clayton, Cobb, DeKalb, Fulton, and Gwinnett Counties and the cities of Atlanta, Gainesville, Marietta, and Roswell. Entitlement communities develop their own programs and funding priorities. HUD determines the amount of each entitlement grant by a statutory dual formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas. There are a number of local requirements for communities to receive their annual funding allocations.
- **CDBG Non-Entitlement Communities** receive funds on a competitive grant basis from the Georgia Department of Community Affairs (Georgia DCA) with approximately \$36 million available for the annual competition. Counties that participate in the state-wide competitive grant process in the Metro Water District include Bartow, Cherokee, Coweta, Douglas, Fayette, Forsyth, Hall, Henry, Paulding and Rockdale.

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