

Section 13: FUTURE PLAN EVALUATION

INTRODUCTION

The Wastewater Management Plan was updated in compliance with the minimum planning elements identified in O.C.G.A. §12-5-583. The legislation identifies the need to periodically assess regional progress towards implementation of the specific actions identified in the Wastewater Management Plan and towards meeting the long-term goal of comprehensive water resources management.

The O.C.G.A. specifically states the following Plan requirements:

“[E]stablishment of short-term and long-term goals to be accomplished by the plan and measures for the assessment of progress in accomplishing such goals and plan.”

“The District shall review ...management plan(s) and (their) implementation annually to determine whether there is a need to update such plan(s) and shall report to the director the progress of implementation of its goals...”

“...the District shall prepare updated ...management plan(s) no less frequently than every five years...”

The short and long-term wastewater management goals are summarized in Section 12 in the implementation schedule and the county level summaries in Appendix B. The wastewater action items provide the framework for evaluating implementation of this Wastewater Management Plan. This section provides an overview of the required plan reviews and plan updates.

PLAN REVIEWS AND UPDATES

There are two types of plan reviews and updates: annual reviews and plan updates that occur every five years. The reviews and updates are an important component of the adaptive management approach for all three of the Metro Water District’s long-term management Plans (wastewater, water supply and water conservation and watershed).

Adaptive management is a type of natural resource management in which decisions are made as part of an ongoing science-based process. Adaptive management involves testing, monitoring, and evaluating applied strategies, and incorporating new knowledge into management approaches that are based on scientific findings and the needs of society. Results are used to modify management policy, strategies, and practices. (USGS)

This adaptive management approach recognizes the limitations of current knowledge regarding future situations and the inevitability of change. These Plans provide a big-picture context for specific actions based on best available data, and will need to be adjusted as better information or new conditions arise. By design, the short-term management measures are outlined in greater detail than the long-term

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management measures. Recommendations for the first 5 years are reasonably firm, whereas those beyond 20 years are expected to be refined several times before they are implemented.

ANNUAL REVIEWS

The purpose of the annual plan review is to identify and discuss implementation challenges to determine if there is a need for plan amendments. The evaluation process provides stakeholders an opportunity to discuss concerns about a particular element of the Wastewater Management Plan. The annual reviews are a reminder that the Plans are adaptable, dynamic, and flexible.

PLAN UPDATES

Plan updates occur at least every 5 years and take a more holistic look at changed conditions and implementation actions since the last Plan Update. Evaluations of changed conditions for Plan Updates may include:

- Population forecasts and trends
- Wastewater management issues
- Identify additional wastewater treatment facilities needed to address demands
- County level summaries located in Appendix B

Undoubtedly, other issues will emerge that merit in-depth consideration in the future. As with existing efforts, future planning work should be open and inclusive, involving all Metro Water District members and stakeholders.

RECOMMENDED ANNUAL REVIEWS AND UPDATES

Table 13-1 displays key items for the Metro Water District to consider in its annual reviews and 5-year updates. It is essential that an updated Plan be prepared no less frequently than every 5 years in order to allow for appropriate adjustments.

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TABLE 13-1

Summary of Plan Elements to be Reviewed and Updated Regularly by the Metro Water District

Key to Actions: ● = Required ◐ = Recommended ○ = Desirable * = Automatic Plan Review Trigger

Plan Elements	Annual Reviews		Five-Year Update	
	Review	Update	Review	Update
Metro Water District Plan recommendations	●	○	●	◐
Education & Public Awareness Programs	●	◐	●	◐
Watershed mandatory local management measures	●	◐	●	◐
Local conservation pricing	●		●	
Local water conservation programs	●	◐	●	◐
Recommended Metro Water District actions	●	◐	●	◐
Recommended actions for state agencies	○		●	
Related Metro Water District and State Plans (Water Supply/ Wastewater/ Watershed, etc)	○		●	◐
Local sewer system operation and maintenance programs	○		●	
New population and demand forecasts			●	●
Funding trends	●		●	
Special Triggers for Plan Reviews				
<i>Note: Any of these actions should trigger an automatic review of their implications for Metro Water District Plans, and needed Plan modifications. Additionally, the status of any of these pending actions should be monitored routinely.</i>				
State-wide Comprehensive Water Management Plan resource assessments or guidance	*	○	●	●
Georgia EPD policy or permit requirement changes	*	○	●	●
Georgia EPD guidance on ACF and ACT basins modified	*	○	●	●
Georgia EPD permit action on water withdrawal, reservoir or discharge (issued/denied/modified)	*	○	●	●
Court rulings on general standards or district-specific cases (e.g. discharges to Lake Lanier)	*	○	●	●
Legislative action relevant to Plans	*	◐	●	●
Major policy action by Metro Water District Board	*	○	●	●
New reservoir permit actions	*	○	●	●
Major change in Georgia DHR regulations on septic systems	*	◐	●	●
Major change in Georgia EPD policies or regulations	*	◐	●	●
Major change in GEFA or federal funding levels or policies	*	○	●	●

PLAN ACCOUNTABILITY

Municipalities have a high level of accountability for implementing the Wastewater Management Plan's required action items through the Georgia EPD audit process. Georgia EPD auditors conduct a thorough review of the local programs and procedures to determine consistency with the Metro Water District Wastewater Management Plan. Communities must substantially comply with the Metro Water District plan provisions in order to modify or obtain new wasteload allocations, water withdrawal permits, GEFA loan funding, or the renewal of MS4 stormwater permits. Overall, this system has worked well to ensure implementation of the provisions of all three Metro Water District plans.

ANNUAL PLAN SURVEY AND REPORTING

The Metro Water District performs an annual survey of local jurisdictions to appraise overall progress towards implementing the Wastewater Management Plan. A summary of these survey results are published annually in the Metro Water District's *Annual Activities and Progress Report*.

Information that will be collected as part of the annual survey and evaluation of progress will include:

- **Sewer System Inspection and Maintenance Programs** – status of asset management program, collection system inspections, maintenance and rehabilitation programs, and capacity certification programs
- **Emergency Overflow Response and Grease Management** – status of local program development and implementation
- **Local Wastewater Master Planning** – reporting of status of master plans (or updates)
- **Septic Systems** – status of planning for and acceptance of septage disposal including land applied septage and applicable restrictions on acceptance, planning future sewer versus unsewered areas
- **Decentralized Systems** – status of local ordinance for decentralized systems
- **Education and Awareness** – collect data on local education and public awareness activities

As additional metrics for measuring progress are developed by the Metro Water District and TCC (see Section 10), they will be included in the annual survey and progress report.

CONCLUSIONS

While the performance will be reported annually by the responsible entities, the final measure of implementation success will be the longer term, demonstrable trends of:

- Development of local wastewater master plans that are consistent with this Wastewater Management Plan
- Planned indirect potable reuse of reclaimed water
- Heightened public awareness and community support through an effective public education and awareness program
- Availability of adequate funding of infrastructure intended to meet the growth needs of the Metro Water District
- Progress on improving surface water quality