



Responses to Comments

on the

Metropolitan North Georgia Water Planning District's

Water Resource Management Plan

June 2017

PUBLIC REVIEW

Providing complete and timely public notice of planning activities is central to the Metro Water District public involvement strategy. The Metro Water District offered multiple public review and comment opportunities during the plan update process.

A. PUBLIC NOTICE

The Metro Water District solicited public review and comment on its draft water resource management plans from April 1, 2017 through April 30, 2017. The 30-day public review and comment period was noticed on March 31, 2017 in the *Fulton County Daily Report* (see Appendix A for publisher's affidavit) and via email to the Metro Water District mailing list (see Appendix B for full email text). Public review and comment opportunities were also advertised on the Metro Water District Web site throughout the period.

B. PUBLIC MEETINGS

The Metro Water District hosted three open-house style public meetings during the 30-day public review and comment period to provide information on the draft water management plan and the overall planning process. Only three citizens attended the three public meetings held on the following days and locations:

- **Tuesday, April 18, 2017, 3:00 p.m. – 5:00 p.m.**
Clayton County Water Authority Headquarters
1600 Battle Creek Road, Morrow, GA 30260
- **Wednesday, April 19, 2017, 3:00 p.m. – 5:00 p.m.**
Georgia Association of Water Professionals
1655 Enterprise Way, Marietta, GA 30067
- **Monday, April 24, 2017, 3:00 p.m. – 5:00 p.m.**
Spout Springs Library
6488 Spout Springs Road, Flowery Branch, Georgia 30542

C. PUBLIC COMMENT RECORD

The public comment record is included in Appendix C.

Attachment A – Notarized Legal Ad in the *Fulton County Daily Report*

ANNOUNCEMENT OF PUBLIC REVIEW AND COMMENT PERIOD AND PUBLIC MEETINGS FOR DRAFT WATER RESOURCES MANAGEMENT PLAN

The Metropolitan North Georgia Water Planning District was created to develop plans and policies to protect water quality and public water supplies, protect recreational values of rivers and lakes and minimize the adverse impacts of development on waters in and downstream of the 15 county area that includes Bartow, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Gwinnett, Hall, Henry, Paulding and Rockdale counties.

The Metro Water District has released the DRAFT Water Resources Management Plan for public comment. The Metro Water District is seeking public review and comment on the draft plan from **Saturday, April 1, 2017 to Sunday, April 30, 2017**. Three public meetings on the draft plan will be held in April 2017. The draft plan, instructions on how to submit comments and a detailed schedule of dates and locations of the public meetings are available on the Metro Water District website at <http://northgeorgiawater.org/plans-manuals/>.

Additional information can be requested at **PlanUpdate@northgeorgiawater.com** or 404-463-3256.
#0000211419:3/31-1km

PUBLISHER'S AFFIDAVIT

STATE OF GEORGIA
COUNTY OF FULTON

Before me, the undersigned, a Notary Public, this day personally came the undersigned who, being duly sworn, according to law, says she is an agent of ALM Media, LLC., publishers of the **Daily Report**, the official newspaper published in Atlanta, GA, in said county and state, and that the publication, of which the annexed is a true copy, was published in said newspaper as provided by law on the following dates: 03/31/2017.





Subscribed and sworn to before me this March 31, 2017



Attachment B –Emailed Notice for Public Comment

From: [Danny Johnson](#)
To: [Danny Johnson](#)
Bcc: [Hidden Recipients](#)

Subject: Released for Public Comment - Draft 2017 Water Resource Management Plan
Date: Monday, April 3, 2017 8:52:00 AM

Good Morning Metro Water District Stakeholders,
The Metropolitan North Georgia Water Planning District has released the Draft 2017 Water Resource Management Plan for Public Comment. The public comment period will run from April 1 to April 30, 2017. Information related to downloading the document and submitting comments may be found on our website: <http://northgeorgiawater.org/plans-manuals/>

Daniel E. Johnson, P.E | Manager | Metropolitan North Georgia Water Planning District |
www.northgeorgiawater.org | 40 Courtland Street NE, Atlanta, GA 30303 | O: 404.463.3260 | M:
404.683.2003 | djohnson@atlantaregional.com

Attachment C – Public Comments and Responses for Posting

Public Comments on the April 2017 Draft Water Resources Management Plan

Comment	Response
Appendix B, Paulding County, Change Dallas plan numbers to three for 2025 and 4 1/2 for 2050.	Change will be made as requested.
Page 3-23, Under Non-Potable Reuse, change to say: "Northwest Cobb WRF, The Northwest Cobb WRF conducts non-potable reuse. It is permitted to discharge 12 MGD to Allatoona Lake or direct a non-potable reuse side stream effluent to Cobblestone Golf Course, Acworth Sports Complex and Kenworth Park for reuse as irrigation water (31.6 MG used for reuse for 2014). The treatment facility provides advanced nitrogen and phosphorus removal, filtration and UV disinfection before discharge to Allatoona Lake.	Change will be made as requested.
Page 3-23, Under Planned Indirect Potable Reuse, change to say: "Noonday Creek WRF and Northwest Cobb WRF, Cobb County has two facilities that provide for indirect potable reuse through returns of highly treated wastewater to Allatoona Lake. The lake is a major water supply for portions of Cobb, Bartow, Paulding and Cherokee Counties. The Noonday Creek WRF has a capacity of 20 MGD and it performs biological phosphorus removal, filtration and UV disinfection before discharging to Noonday Creek, a tributary of Allatoona Lake. The Northwest Cobb WRF has a capacity of 12 MGD and provides advanced nitrogen and phosphorus removal, filtration and UV disinfection before discharge to Allatoona Lake. Cobb County-Marietta Water Authority has contracted with the U.S. Army Corps of Engineers for water supply storage in Allatoona Lake. Georgia EPD has exercised its authority to allocate the made inflows from both treatment facilities to Cobb County-Marietta Water Authority	Change will be made as requested.
In line 5 above, make sure to remove the "D" from MGD in the parenthesis.	Change will be made as requested.
Action Item 11 - I would like to recommend the language be revised to include only local governments with biota impaired waters or local governments with EPD approved Watershed Protection Plans. The language now says each local government. City of Sandy Springs has a MOU with Fulton County to monitor Macroinvertebrate Bioassessment for its biota impaired streams. Thank you for your consideration.	The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
Appendix B	
Fulton County Wastewater - Summary of Needs	
Within the Summary of Needs Chart, I request adding a flow from Fayette County (from the Town of Tyrone) of 0.4 MGD pursuant to an Agreement between Fulton County and the Town of Tyrone. I also request the following comment be added under the heading of "Basin Considerations" below the Summary of Needs Chart to read as follows: "Tyrone (in Fayette County) will continue to pump effluent from the Flint Basin to the Chattahoochee Basin." I am also sending an independent email to Danny Johnson at djohnson@atlantaregional.com.	Flow from Tyrone will be added into Appendix B. The Basin Considerations note will be changed to say "Tyrone (in Fayette County) will continue to discharge to the Chattahoochee Basin."
Appendix B	
Fayette County Wastewater - Summary of Needs	
Within the Summary of Needs Chart, I request adding a flow to Fulton County (from the Town of Tyrone) of 0.4 MGD pursuant to an Agreement between Fulton County and the Town of Tyrone. I also request the following comment be added under the "Capital Projects" heading below the Summary of Needs Chart: "Fairburn and Fulton County will continue to provide wastewater treatment to Tyrone through agreements." I also request the following comment to be added under "Basin Considerations": "Tyrone will continue to discharge to the Chattahoochee Basin." I am also sending an independent email to Danny Johnson at djohnson@atlantaregional.com.	Flow from Tyrone will be added into Appendix B. Under the "Capital Projects" heading, the following note will be added, "Fairburn and Fulton County will continue to provide wastewater treatment to Tyrone through agreements." The Basin Considerations note will be changed to say "Tyrone (in Fayette County) will continue to discharge to the Chattahoochee Basin."
2.1 Planning Principals for the 2017 Plan Update •We appreciate the specificity added to side bar regarding "Non-potable reuse policy" (i.e. "assimilative capacities") and "Reuse Flows..." (i.e. Allatoona Lake and Lake Lanier). •Indirect potable reuse is an environmentally sound water supply strategy. However, return credit enables permittees to increase their withdrawals upstream with no assurance the returns will be made in a way to minimize downstream impacts. We suggest the District add a requirement that downstream impacts—on water quality, waste assimilation and aquatic life—will be taken into account prior to pursuing a return credit policy. •"Made inflow" policy: We would prefer to see the District and the state focus on establishing a permanent instream flow policy to manage existing flows, withdrawal requests, and discharge requests as opposed to creating a new category of "made inflows."	The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
Table 3-1 Existing Permitted Surface Water Supply Withdrawals in the District •Revisions to totals noted and appreciated.	The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
3.2.4 Non-Municipal Permitted Withdrawals •On a process note, excluding water withdrawals (and returns) for the power generation sector from the Water Resource Management Plan, regardless of the stated "non-consumptive" nature of the withdrawals for cooling purposes, represents a departure from full water budgeting and the spirit of integrated water resources management.	The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.

Comment	Response
<p>3.2.5 Water Conservation</p> <ul style="list-style-type: none"> •We are pleased to see the District revise Figure 3-2, “District Annual Per Capita Water Usage.” During and after the 2008 Plan review, CRK expressed repeated concerns about flawed water demand, population and employment projection data—particularly for 2006 baseline data—to make an argument that the District’s water conservation goals did not go far enough. After ten years, we are pleased the District agreed that previous data was inaccurate and has corrected the record. The previous and current data is graphed below. •The District has made strides in water conservation while Atlanta’s population has grown. As CRK has noted in previous comments, the District may have a messaging challenge ahead as the per capita water use increases in the future as the district has projected. The 2013 per capita data point—an admirably low 97 gallons per capita day (gpcd)—is presented without critical context. Most notably, 2013 was a year that received significantly more rainfall than normal—66.02 inches according to the National Weather Service’s Atlanta station. What does this mean? In 2013, the metro Atlanta region received nearly 20 inches more rainfall than the thirty year average. In 2013, with more rain falling from the sky, fewer customers were watering outdoors—which is among a household’s highest water use activities and can account for 30 to 50 percent of household water use. We predict that additional per capita per day data for 2014 and beyond will sketch out an upward trend line, particularly given the state’s slow response to drought and implementation of outdoor water use restrictions in 2016 when annual rainfall in Atlanta was 38.7 inches and the reports of high volume outdoor water use by end users. •Reduction in per capita alone is not the same as a reduction in overall water use. Why was Section 3.4.4 Net Water Use and Table 3-13 Net Water Use in the District removed? More current data is available from Georgia EPD. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.</p>
<p>Table 3-8 Existing Permitted Wastewater Treatment Facilities in the District</p> <ul style="list-style-type: none"> •Formatting observation: The table wraps onto page 3-8 and contains no data. 	<p>Formatting change will be made to Table 3-8.</p>
<p>3.4.3 Existing Interbasin Transfers</p> <ul style="list-style-type: none"> •Table 3-12 represents an improvement over previous reports in portraying a “Summary of Interbasin Transfers.” EPD has previously published an excellent graphic showing the direction of existing IBT flows. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.</p>
<p>3.4.4 Net Water Use and Table 3-13 Net Water Use in the District</p> <ul style="list-style-type: none"> •Why was Section 3.4.4 Net Water Use and Table 3-13 Net Water Use in the District removed? More current data is available from Georgia EPD. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.</p>
<p>5.1 Integrated Water Resource Management Action Items</p> <ul style="list-style-type: none"> •We support the District’s intent to encourage the Return of Highly Treated Wastewater to the Chattahoochee River Basin below Buford Dam and in the Flint River Basin. From CRK’s perspective, this is particularly important because the U.S. Army Corps of Engineers explicitly warns in the Apalachicola-Chattahoochee-Flint River Basin, Water Control Manual and Final Environmental Impact Statement (December 2016) that water quality in the Chattahoochee River will be adversely effected below Buford Dam, downstream of Peachtree Creek, and to West Point Lake. According to the Corps, basin operations will result in degraded water quality under the new Manual, and will lead to some degree of adverse impacts on total phosphorous, total nitrogen and dissolved oxygen (DO). [See FEIS, 5-47; Executive Summary 30-31, 39-40] Furthermore, the District should be advised that the Georgia Environmental Protection Division (EPD) is no longer maintaining a critical monitoring station on the Chattahoochee River. Our greatest concern is that even if there are water quality violations as a result of the lower flows as proscribed in the new Manual, they will never be discovered. In the past, EPD operated a single dissolved oxygen (DO) monitoring station in Metro Atlanta at Highway 92 and Capps Ferry Road, to monitor water quality. However, EPD has discontinued operations of the real-time monitor. [See Letter from Richard E. Dunn, Director, Georgia Environmental Protection Division, to Colonel James DeLapp, U.S. Army Corps of Engineers, Mobile District, 11/9/2016. (“EPD’s past requests and monitoring have relied, at least in part, on a real-time monitor at Capps Ferry. Please note that this observation site has been discontinued due to resource constraints.”)]] 	<p>The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.</p>
<p>I-1 Coordinated Actions</p> <ul style="list-style-type: none"> •We continue to support this action item and agree that further specificity regarding sub-task responsibility is appropriate. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<ul style="list-style-type: none"> •We continue to support the District’s requirement that local water providers develop local water master plans, and include Climate Resiliency assessments and planning sections in those plans. •We agree that an evaluation of existing interbasin transfers is also an appropriate addition. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<ul style="list-style-type: none"> •We continue to support the District’s requirement that local water providers develop and update local emergency water plans. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<p>I-4 Local Wastewater Master Plans</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local wastewater providers develop local wastewater master plans, and include Climate Resiliency assessments and planning sections in those plans. •We support added language regarding consideration of the relationship between septic system use, stream baseflow, and pollutant loading in areas where return flows would enhance water quality and supply. 	<p>The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.</p>
<p>I-5 Connection to Public Sewer</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments and wastewater providers formalize policies that will address the conversion of septic systems to sewer service in order to return flows to the basin of origin where feasible and appropriate. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<p>I-6 Source Water Assessment and Protection Program</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local water providers develop Source Water Protection Plans. •We are pleased that the District included our recommendation that local water providers also consult the Georgia Environmental Protection Division’s “Hazardous Site Inventory” when completing “an inventory of potential sources of contamination.” 	<p>The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.</p>

Comment	Response
<p>I-7 Water Supply Watershed Protection</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement for local governments with a source water supply watershed within their jurisdiction to adopt water supply watershed buffers as required by the Part V Environmental Planning Criteria. •The District has a vested interest in supporting any Georgia General Assembly effort to consistently measure, establish and enforce stream buffer protections on state waters, and we look forward to the District’s participation in a Joint Study Committee on Stream Buffers in Georgia (SR 152) to make sure that Sound Science is incorporated into the Committee’s report, which must be completed by December 31, 2017. 	<p>The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.</p>
<p>I-8 Septic System Planning</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments develop a plan that identifies where and under what conditions septic systems are appropriate. •We support added language regarding consideration of WWTP capacity, and the relationship between septic system use, stream baseflow, and pollutant loading in areas where return flows would enhance water quality and supply 	<p>The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.</p>
<p>I-9 Septic System Critical Area Management</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments identify and provide enhanced management of septic systems in critical areas. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<p>I-10 Septic System Septage Disposal</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments develop septage disposal plans and collaborate with County Board of Health departments to improve collection of data regarding septage disposal, including septage manifest documentation. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<p>I-11 Septic System Maintenance Education</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments shall offer ongoing septic system maintenance education. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<p>I-12 Private Decentralized Wastewater Systems Ordinance</p> <ul style="list-style-type: none"> •We continue to support the District’s requirement that local governments shall adopt and maintain local ordinances regarding decentralized wastewater systems. 	<p>The Metro Water District Governing Board Working Group has reviewed the comment and appreciates the support for the referenced Plan item.</p>
<ul style="list-style-type: none"> •We support the District’s requirement that wastewater providers return flows to the basin of origin where feasible and appropriate. •The District uses the term “highly treated wastewater” throughout the Plan. What is the District’s definition of “highly treated wastewater?” We understand the intention of this Action Item, recognize the complexity of the issue as noted in the Implementation Guidance subsection, and appreciate the Georgia Environmental Protection Division’s role as the permitting authority. Does “highly treated wastewater” mean meeting minimum requirements, implementing the best available technology, or something else? •Indirect potable reuse is an environmentally sound water supply strategy. However, return credit enables permittees to increase their withdrawals upstream with no assurance the returns will be made in a way to minimize downstream impacts. We suggest the District add a requirement that downstream impacts—on water quality, waste assimilation and aquatic life—will be taken into account prior to pursuing a return credit policy. This is particularly important because the U.S. Army Corps of Engineers explicitly warns in the Apalachicola-Chattahoochee-Flint River Basin, Water Control Manual and Final Environmental Impact Statement (December 2016) that water quality in the Chattahoochee River will be adversely effected below Buford Dam, downstream of Peachtree Creek, and to West Point Lake. According to the Corps, basin operations will result in degraded water quality under the new Manual, and will lead to some degree of adverse impacts on total phosphorous, total nitrogen and dissolved oxygen (DO). [See FEIS, 5-47; Executive Summary 30-31, 39-40] Furthermore, the District should be advised that the Georgia Environmental Protection Division is no longer maintaining a critical monitoring station on the Chattahoochee River. Our greatest concern is that even if there are water quality violations as a result of the lower flows as proscribed in the new Manual, they will never be discovered. In the past, the EPD operated a single dissolved oxygen (DO) monitoring station in Metro Atlanta at Highway 92 and Capps Ferry Road, to monitor water quality. However, EPD has discontinued operations of the real-time monitor. [See Letter from Richard E. Dunn, Director, Georgia Environmental Protection Division, to Colonel James DeLapp, U.S. Army Corps of Engineers, Mobile District, 11/9/2016. (“EPD’s past requests and monitoring have relied, at least in part, on a real-time monitor at Capps Ferry. Please note that this observation site has been discontinued due to resource constraints.”)] •“Made inflow” policy: Made inflow, as defined in rule, will affect Georgia’s regulated riparian rights system. Currently, the state must manage state waters for the benefit of all water users and uses. Made inflow will alter that system by authorizing the generation of flows and addition of volume to any federal reservoir. Excluding made inflow from storage contracts and crediting users for made inflow is bad accounting for users downstream of a federally operated reservoir. By avoiding a full accounting of made inflow from storage contracts, water withdrawal permit holders and Georgia effectively capture more water supply from federal reservoirs that will not be available for other users or downstream needs in Georgia and neighboring states. We would prefer to see the District and the state focus on establishing a permanent instream flow policy to manage existing flows, withdrawal requests, and discharge requests as opposed to creating a new category of “made inflows.” •We ask the District to support and advocate for a U.S. Army Corps of Engineers feasibility study to evaluate the possibility and costs necessary to raise Lake Lanier’s full-pool by two feet. The Atlantic Division of the Corps has advised CRK that such a study would cost approximately \$3,000,000. Furthermore, the federal government and state of Georgia can enter a cost-share agreement to fund such a study, and the state of Georgia has set a precedent for cost-sharing in Corps projects. For example, the state of Georgia has committed \$266,000,000 in state dollars for the Savannah Harbor Expansion Project. Additionally, the state of Georgia has expressed explicit support for a Lake Lanier study. In a 2016 comment letter regarding the Apalachicola-Chattahoochee-Flint River Basin Water Control Manual Draft Environmental Impact Statement, the state of Georgia requested “that the Corps raise the elevation of Lake Lanier at full pool as part of its water management plan” because “of the strong ACF Basin support for raising the elevation of Lake Lanier.”[Apalachicola-Chattahoochee-Flint River Basin, Water Control Manual and Draft Environmental Impact 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item. - Section 5.3.3, Second paragraph, After "...is the responsibility of Georgia EPD." add the following two sentences, "When this Plan uses the term “highly treated wastewater” it means water meeting the facility-level treatment limits as determined by Georgia EPD. The Plan does not presuppose or require any specific level of treatment, including tertiary treatment." - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<p>I-14 Encouraging the Return of Highly Treated Wastewater to the Chattahoochee and Flint</p> <ul style="list-style-type: none"> •We support the long-term sustainability of water use from the Chattahoochee River Basin below Buford Dam and the Upper Flint Basin by encouraging, where feasible, returns of highly treated wastewater to these basins. •The District uses the term “highly treated wastewater” throughout the Plan. What is the District’s definition of “highly treated wastewater?” Does “highly treated wastewater” mean meeting minimum requirements, implementing the best available technology, or something else? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item. - See second bullet in the cell above.

Comment	Response
<p>5.2.1 Expanded and New Water Conservation Measures</p> <ul style="list-style-type: none"> •We support the District’s decision to apply water conservation measures that were added to the plan in 2010 that applied only to the Chattahoochee and Lanier basin to now apply to the entire District. We encourage the District to support further expansion and application of, and provide technical assistance to implement, these conservation measures outside of the District, particularly in the Apalachicola-Chattahoochee-Flint River basin. •We are pleased to see language reiterating and clarifying that the District incorporates “water saved from conservation measures” in the planning process. •The District’s Utility Climate Resiliency Study (December 2015) does consider “contributing factors” to explain the differences in water use between 2007 and 2013. The study does not explain why the selected data set was “assumed to be representative of the District as a whole.” [pp. 3-1; 4-1; and Appendix C] What population data did the District use: the same two data sets used in previous “District Annual Per Capita Water Usage” tables, or the data set used to create the same table in the current draft? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<p>5.2.2 Surface Water Supply Sources by River Basin: 2014 to Planned 2050</p> <ul style="list-style-type: none"> •Please double check the totals listed in Table 5-2, specifically for the Flint River Basin. 	<p>Table 5-2 will be updated with the corrected total for Flint River Basin.</p>
<p>5.2.3 2050 Planned Reservoirs</p> <ul style="list-style-type: none"> •We are pleased that the District no longer recommends blanket “support” of construction of water supply reservoirs. The District elected not to include in this plan a proposed action item to construct 5 new water supply reservoirs: Glades, Bear Creek (South Fulton), Etowah, Ocmulgee, and Cedar Creek Reservoirs. [per the “Preliminary Summary: Implementation Actions for Local Communities,” July 30, 2015] •We recommend that the District require any utility, municipality, or authority seeking to build a new water supply reservoir demonstrate consistent improvement in their Georgia Water Stewardship Act required annual water loss audits. For example, entities must demonstrate a data validity score of 71 or greater, an above average reduction in non-revenue water (NRW), and an improvement in the Infrastructure Leak Index (ILI) based on performance indicator values found in the US Environmental Protection Agency’s Best Practices to Consider When Evaluating Water Conservation and Efficiency as an Alternative for Water Supply Expansion. [https://www.epa.gov/sites/production/files/2016-12/documents/wc_best_practices_to_avoid_supply_expansion_2016_508.pdf, page 21] •There is a typo in this section: second paragraph, 6th line has two periods after “supply.” 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The typo will be corrected.
<p>WSWC-1 Water Conservation Program</p> <ul style="list-style-type: none"> •We continue to support this action item to provide sufficient funding and staffing to implement the required water conservation measures in this plan. •We continue to support the implementation and collection of a “commercial water efficiency fee” as a mechanism to fund the retrofit of fixtures, facilitate commercial water audits, and implement other necessary commercial water efficiency programs. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.
<p>WSWC-2 Conservation Pricing</p> <ul style="list-style-type: none"> •We continue to support this action item requiring implementation of appropriate conservation pricing and rates for commercial, multi-family, industrial and institutional customers. •We appreciate the District’s clarification that this requirement enables a local water provider to meet the requirement to develop a drought surcharge, given that the surcharge was not widely supported during development of EPD’s Drought Management Rule. •We agree with the Metro District’s position to ‘discourage’ non-potable reuse for irrigation with the goal to enhance “instream water quality and downstream uses.” •We support the District’s strong language to “not allow” the use of declining block rate structures. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.
<p>WSWC-3 Billing Cycles and Billing System Functionality</p> <ul style="list-style-type: none"> •We continue to support this action item requiring implementation of billing systems to communicate with customers on a monthly basis and provide regionally consistent consumption data, and agree on the use of gallon-based units. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>WSWC-4 Private Fire Lines Metering Requirement</p> <ul style="list-style-type: none"> •We support the requirement for local governments to adopt an ordinance or policy to meter private fire lines in commercial buildings. •Why was the sub-task included in the Draft Water Resources Management Plan (December 2016) requiring meters on existing fire lines in buildings undergoing renovation removed? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - Sub-task 2 will be added back in as “Adopt an ordinance or policy by January 1, 2019 to require private fire lines supplying any commercial building that is undergoing a substantial renovation to have full flow meters or double detector checks.” - After “...and can be improperly categorized” the following paragraph will be added back in “Each local government shall determine what constitutes substantial renovation thereby triggering the requirement that meters or double detectors checks be installed on existing commercial buildings. However, the threshold for substantial renovation should be at such a level that it will be reasonable to expect that new meters or double detector checks will be installed in at least some existing commercial buildings each year.”
<p>WSWC-5 AMI Benefit and Feasibility Studies</p> <ul style="list-style-type: none"> •We continue to support the requirement that local water providers evaluate the benefits and feasibility of Advanced Metering Infrastructure (AMI), and where feasible, implement an effective AMI program. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.

Comment	Response
<p>WSWC-6 Toilet Replacement Program</p> <ul style="list-style-type: none"> •We continue to support the requirement that local water providers implement and manage toilet replacement programs for single-homes and multi-family housing. •We recommend these programs be expanded to require commercial customers—including private educational institutions, non-profits (including churches) and small businesses—to comply. •The District has previously considered implementation of a toilet retrofit on reconnect or resale requirement. We recommend the District reconsider and implement this measure now. •Given the regulatory state’s uncertain direction and speculation regarding cuts to the US Environmental Protection Agency’s budget, if the EPA eliminated the WaterSense program, then can we expect the District to amend the Plan to create a new standard? •There is a typo in “Implementation Guidance,” the last bullet, in the second sentence: “...including BUT not limited...” 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The current standard gallons per flush is called out under Implementation Guidance and will hold as the standard should the WaterSense program be eliminated. - The typo will be corrected.
<p>WSWC-7 Ultra-High-Efficiency Toilets and Urinals in Government Buildings</p> <ul style="list-style-type: none"> •We continue to support the requirement that local water providers and governments replace toilets and urinals that achieve greater efficiencies and are WaterSense labeled. •Given the regulatory state’s uncertain direction and speculation regarding cuts to the US Environmental Protection Agency’s budget, if the EPA eliminated the WaterSense program, then can we expect the District to amend the Plan to create a new standard? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The current standard gallons per flush is called out under Implementation Guidance and will hold as the standard should the WaterSense program be eliminated.
<p>WSWC-8 Commercial Water Use Assessments</p> <ul style="list-style-type: none"> •We continue to support this recommendation. •We support the District’s intent to provide technical and administrative support for implementation of this action item. •We are disappointed the District elected not to follow through with a proposed action item (per the “Preliminary Summary: Implementation Actions for Local Communities,” July 30, 2015) to develop an inventory of all cooling towers AND require towers to run at 6 or more cycles of concentration. This is an area where further investment in research, data collection and a pilot program can demonstrate what is possible and quantify water savings. •I think there is a formatting error: are there supposed to be two subtasks? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support and feedback for the referenced Plan item. - Formatting for SubTask 2 to be corrected.
<p>WSWC-9 Pre-rinse Spray Valve Replacement Program</p> <ul style="list-style-type: none"> •We continue to support the requirement that local water providers implement a replacement program for pre-rinse spray valve replacement, and the inclusion of a data tracking mechanism. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>WSWC-10 Outdoor Watering Requirements for Large Landscapes</p> <ul style="list-style-type: none"> •We support the Outdoor Watering Requirements for Large Landscapes and recommend the following: When implemented, this action item and requirement should apply to large landscapes on single-family properties; and when implemented, this action item should include a requirement for inspections every-other year; this should not be reduced to a “consideration for enhanced implementation.” •Maintenance of systems should be required. •We support the creation of a regional incentive program to facilitate the installation of smart irrigation controller technologies. •This Action Item lack “Sub-Tasks.” Why? •Why was the requirement for “Dedicated sub-meters for new irrigation systems” as originally proposed in the Draft Water Resources Management Plan (December 2016) shifted to a “Consideration for Enhanced Implementation”? This is interesting in the context of the Florida v. Georgia case, where the District was recognized by the Special Master for wise water stewardship, and Georgia’s farmers, producers and regulators were targets for unwise water management. There is evidence that not all agricultural permit holders are properly metering and measuring their water use. If Georgia is moving in a direction of aggressive agricultural metering while the District is moving in the opposite direction for large landscape metering, then the inequity will be obvious. Outdoor landscapes may have a greater difficulty claiming agricultural exemptions from water conservation and efficiency best management practices in the future. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - Only one action is required, therefore subtasks are not required. - All water supplied to irrigation systems is already metered making this sub-task redundant.
<p>WSWC-11 State Water Conservation Requirements</p> <ul style="list-style-type: none"> •We continue to support this action item as a general statement to remind local governments and water providers of what state laws and regulations they are required to comply with. •Why was a requirement to adopt an ordinance limiting outdoor water use as originally proposed in the Draft Water Resources Management Plan (December 2016) removed? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - This requirement is generally covered by state law, and localities handle this in a variety of ways, from contract terms and conditions, ordinances etc.
<p>WSWC-12 Require Car Washes to Recycle Water</p> <ul style="list-style-type: none"> •We continue to support this action item and the reminder to local governments that new conveyor car washes are already required to recycle a minimum of 50 percent of water used per 391-3-31 Rules for Water Conservation Best Management Practices and Certification. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>WSWC-13 Water Waste Policy</p> <ul style="list-style-type: none"> •We continue to support this action item requiring each local government to adopt a water waste ordinance or policy to reduce outdoor water waste. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>WSWC-14 Water System Asset Management</p> <ul style="list-style-type: none"> •We continue to support this action item requiring development of an asset management program that ensures proper management of the water system. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>WSWC-15 Water Loss Control and Reduction</p> <ul style="list-style-type: none"> •We continue to support this action item to develop and implement a program to identify and reduce real water losses, and appreciate the respect new language for providers to set “individualized goals.” 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.

Comment	Response
<p>WSWC-16 Local Public Education Program</p> <ul style="list-style-type: none"> •We continue to support this action item to develop and implement a local water efficiency and conservation education program to reduce indoor water use AND the expansion to include outdoor landscapes. •While we are glad to see a requirement to promote the US Environmental Protection Agency’s WaterSense New Homes, we are disappointed the District elected not to follow through with a proposed action item (per the “Preliminary Summary: Implementation Actions for Local Communities,” July 30, 2015) to develop “New Home Green Building Standards.” 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<p>5.3.1 Wastewater Infrastructure Plan</p> <ul style="list-style-type: none"> •We continue to support the utilization of wastewater treatment facilities that treat wastewater to the highest quality which is technologically available before returning water to its original surface water source, as compared to septic and land application. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>5.3.3 Wastewater Treatment Standards</p> <ul style="list-style-type: none"> •As the volume of treated wastewater discharges increases with population, wasteloads in the receiving waterbodies will be of increasing concern. Given the conclusions of the District’s Utility Climate Resiliency Study regarding the potential intersection of decreased stream flows and increased waste loads, the Plan should recommend as new plants are built or existing plants are expanded, that they are built to treat to the highest possible quality and not to just meet existing wasteload allocations. •The District uses the term “highly treated wastewater” throughout the Plan. What is the District’s definition of “highly treated wastewater?” We recognize the complexity of the issue as noted in previous Action Items and the Georgia Environmental Protection Division’s role as the permitting authority. Does “highly treated wastewater” mean meeting minimum requirements, implementing the best available technology, or something else? 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - Section 5.3.3, Second paragraph, After "...is the responsibility of Georgia EPD." add the following two sentences, "When this Plan uses the term “highly treated wastewater” it means water meeting the facility-level treatment limits as determined by Georgia EPD. The Plan does not presuppose or require any specific level of treatment, including tertiary treatment."
<p>WW-6 Capacity Certification Program</p> <ul style="list-style-type: none"> •Sewer system capacity—both at the treatment plant and in the delivery system—is a major concern as the region continues to grow. A number of sewer and trunk delivery lines in the region are already near full capacity during base flow conditions. Because these systems are near full capacity at base flow, they have no buffering capacity to account for infiltration/inflow (I/I) and experience frequent spills during rain events. The Plan should address capacity of individual sewer-sheds and account for I/I in capacity calculations. Any sewer-shed that cannot account for peak sewer flow and I/I should place a moratorium on future connections until capacity is increased. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<p>Section 5.4 Watershed Management Action Items</p> <ul style="list-style-type: none"> •Possible typo: fifth paragraph: "...water quality DATA[?] collected by..." [page 5-100] 	<p>Section 5.4, fifth paragraph, the word "data" will be added following "quality"</p>
<p>WS-1 Post-Development Stormwater Management</p> <ul style="list-style-type: none"> •Implementing a runoff reduction-based ordinance should be mandatory under this section. The Model Post-Development Stormwater Management Ordinance should be revised to require developments and re-developments to retain or infiltrate at least the first inch of each storm event. <p>WS-2 Construction Erosion and Sedimentation Control</p> <ul style="list-style-type: none"> •We appreciate the corrections made to this section in response to our previous comments. <p>WS-3 Floodplain Management</p> <ul style="list-style-type: none"> •We support this action item and agree with the new language in the Considerations for Enhanced Implementation regarding “buy-out” programs. <p>WS-4 Stream Buffer Protection</p> <ul style="list-style-type: none"> •The District has a vested interest in supporting any Georgia General Assembly effort to consistently measure, establish and enforce stream buffer protections on state waters, and we look forward to the District’s participation in a Joint Study Committee on Stream Buffers in Georgia (SR 152) to make sure that Sound Science is incorporated into the Committee’s report, which must be completed by December 31, 2017. <p>WS-7 Promoting a Green Infrastructure Approach Control [Jason needs to read the new version of the plan to make sure they are correct.]</p> <ul style="list-style-type: none"> •We continue to support the implementation of development and land use policies or practices to encourage the protection of greenspace and/or the use of green infrastructure within the community. <p>WS-9 Ongoing Stormwater System Management</p> <ul style="list-style-type: none"> •We continue to support this action item and consolidation, and we agree these requirements “should be implemented in combination to form a basic stormwater management program.” •We support and encourage local government to implement stormwater utility fees to “provide dedicated funding to support stormwater” system management and maintenance. Local governments should be strongly encouraged to adopt a stormwater utility within this section. <p>WS-10 Long Term Ambient Trend</p> <ul style="list-style-type: none"> •We support the new Consideration for Enhanced Implementation suggesting that local jurisdictions work with community groups to monitor water quality and land use in the District’s watersheds. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan. - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the support for the referenced Plan item.
<p>Section 5.5 Public Education</p> <p>5.5.4Key Public Messages and Target Audiences</p> <ul style="list-style-type: none"> •While we support the District’s key messages, and appreciate new language that articulates the need for “regular inspections and maintenance to extend” water efficiency benefits and savings, we remain concerned that data has been previously presented in ways that call conclusions into question. As noted above, during and after the 2008 Plan review, CRK expressed repeated concerns about flawed water demand, population and employment projection data—particularly for 2006 baseline data—to make an argument that the District’s water conservation goals did not go far enough. After ten years, we are pleased the District agreed that previous data was inaccurate and has corrected the record. Furthermore, the District has made strides in water conservation while Atlanta’s population has grown. As CRK has noted in previous comments, the District may have a messaging challenge ahead as the per capita water use increases in the future as the district has projected. We predict that additional per capita per day data for 2014 and beyond will sketch out an upward trend line. This could be particularly true given the state’s slow response to drought in 2016. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.

Comment	Response
<p>Section 6 Plan Implementation and Future Plan Evaluation</p> <ul style="list-style-type: none"> •We appreciate the inclusion of an “abbreviation” list at the beginning of the Water Resource Management Plan. <p>6.4.3 Relevant Loan and Grant Program Descriptions</p> <ul style="list-style-type: none"> •I see a typo in 1(d): “From 2009 to 2015...” <p>6.5.1 Plan Reviews and Updates</p> <ul style="list-style-type: none"> •We support the Plan’s reminders to local governments and water providers of what state laws and regulations they are required to comply with. <p>However, we also remain confused: why does the District continue to include implementation dates for items that have been in the plan for years? To more accurately track implementation of this plan, the District should mandate completion of an improved and more robust Plan Implementation Review survey and post the results for public review. And the Georgia Environmental Protection Division should provide more transparency regarding results to the auditing process.</p>	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The typo will be corrected. - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the feedback for the referenced Plan section. No action will be made to change the Plan.
<p>Appendix A River Basin Profiles</p> <ul style="list-style-type: none"> •Page 1, first paragraph, second sentence, after “land use” insert comma •Page 4, in “Land Use,” first paragraph, last sentence, after “activities” insert “to” <p>Upper Chattahoochee</p> <ul style="list-style-type: none"> •We appreciate the correction made on Page UC-3 regarding flow data. •We continue to support the District’s Recommended Strategies to improve water quality and water supply protection in the Upper Chattahoochee River Basin. <p>Middle Chattahoochee</p> <ul style="list-style-type: none"> •We appreciate the removal of references to the proposed Bear Creek Reservoir (Fulton County), but we did not intend for references to the existing Bear Creek Reservoir (Douglasville-Douglas County Water and Sewer Authority) to be removed inadvertently. •We continue to support the District’s Recommended Strategies to improve water quality and water supply protection in the Middle Chattahoochee River Basin. 	<ul style="list-style-type: none"> - Page 1, first paragraph, second sentence, a comma will be inserted after “land use” - Page 4, in “Land Use,” first paragraph, last sentence, “to” will be inserted after “activities” - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item. - Middle Chatt BPP, the Bear Creek Reservoir (Douglasville-Douglas County Water and Sewer Authority) will be added back into table. - The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<p>Section 5, Page 5-22, While the Georgia REALTORS® are supportive of the efforts of the Metropolitan North Georgia Water Planning District, we would like to express concern in the generalized prescription of a minimum lot size of one acre for septic systems. Such a simplified approach to the regulation of septic systems does not take into account specific soil conditions across the geographical diversity of the encompassed jurisdictions, nor does it take into account modern systems that are more efficient and ecologically sound than the conventional systems being referenced in the report. The approach taken would adversely affect the private property owner. Thus, while mindful of the underlying intent, our proffer would be to not prescribe a minimum lot size that would apply to all systems in each jurisdiction of the district. Instead, each jurisdiction should be able to consider the soil types, percolation rate and type of septic system to most appropriately protect the rights of the private property owner and the health of its citizens.</p>	<p>The language does not require a minimum lot size. No action will be made to change the Plan.</p>
<p>Appendix B, Fulton County Water, Summary of Planned Sources, Note 2 - the Bear Creek project is currently planned with a yield of 16.44 MGD not 15.</p>	<p>Appendix B, Fulton County Water, the yield of the Bear Creek reservoir will be changed from 15 to 16.44.</p>
<p>It does not surprise me that localities at every level are possessive of “their” water and can fail to see the need for large scale planning to assure adequate clean water for everyone. What does surprise me is the provincial way in which almost everyone still regards wastewater and sewage as if this were not far and away the most critical and immediate need we have for large scale water management with reference to maintaining clean water. Many communities simply can not afford to bring large areas of septic treatment into modern collection and processing systems. There needs to be some focus by the state on helping communities fund these transitions.</p>	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed these comments and appreciates the feedback for the referenced Plan section. No action will be made to change the Plan.
<p>Middle Chattahoochee River Basin Profile, Page 1-20, What is the total number of watersheds? By searching for the priority watersheds and declaring HUC- 12 and then comparing them with the impaired streams and then the drinking watersheds makes the problem look worse than it is</p>	<ul style="list-style-type: none"> - Comment and page reference are unclear. No action will be made to change the Plan.
<p>Upper Flint River Basin Profile, Page 1-16, What is the total number of watersheds? Same logic as above.</p>	<ul style="list-style-type: none"> - Comment and page reference are unclear. No action will be made to change the Plan.
<ul style="list-style-type: none"> • Section 3.3.1, page 3-14: Under the Douglas County bullet, please remove the added text “(permit remains active)” after St. Andrew’s LAS. The permit for this facility is not active. 	<p>Change will be made as requested.</p>
<ul style="list-style-type: none"> • Action Item WSWC-4, page 5-46: We recommend adding back in subtask 2 that is struck out in the redline. We believe removing this requirement misses an opportunity to capture potentially substantial amounts of water usage on these fire lines. As we have previously stated, we further recommend eliminating the option of a double detector check in subtasks 1 and 2 so that the requirement is for a full flow meter in all cases. 	<ul style="list-style-type: none"> - Sub-task 2 will be added back in as “Adopt an ordinance or policy by January 1, 2019 to require private fire lines supplying any commercial building that is undergoing a substantial renovation to have full flow meters or double detector checks.” - After “...and can be improperly categorized” the following paragraph will be added back in “Each local government shall determine what constitutes substantial renovation thereby triggering the requirement that meters or double detectors checks be installed on existing commercial buildings. However, the threshold for substantial renovation should be at such a level that it will be reasonable to expect that new meters or double detector checks will be installed in at least some existing commercial buildings each year.”
<ul style="list-style-type: none"> • The plan’s focus on integrated management is admirable and intelligent. One suggested addition: The plan should make explicit connections between green infrastructure (both site-scale and landscape-scale) and integrated management. There are numerous points of convergence between green infrastructure-based stormwater management and water quality, baseflow and healthy flows in urban streams, water availability and stream health, etc. 	<ul style="list-style-type: none"> - The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.

Comment	Response
<ul style="list-style-type: none"> The plan's explicit attention to surface flow challenges and the need for return flows (of sufficient water quality) in the upper Flint basin is much appreciated. 	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<ul style="list-style-type: none"> Overarching comments on the Water Supply and Water Conservation section: I strongly support the progress represented in this section on water conservation and efficiency requirements in the District, including the expansion of the 2010 plan amendments to apply District-wide. The material on water loss, AMI, fire lines, rates, irrigation and overall end-use efficiency is commendable. This is one area in which the District's technical assistance will likely be critical to successful and widespread implementation by member utilities. Implementing the water conservation and efficiency measures included here will benefit water utilities, their customers, and water resources throughout the District and downstream well into the future. 	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
That said, the WSWC section would be stronger and more effective if it included more metrics/ goal-setting for member utilities in some form. Rather than "having a program" being the requirement on most counts, it would be good to outline both implementation and performance metrics that will help member utilities clearly chart progress toward the broad goals outlined at the top of this section and in the plan as a whole.	- The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
Put another way, here are three overarching recommendations for the District's approach to water efficiency and conservation:	
1) Invest: We need to make significant financial investments, commensurate to the overall scale of water use and management throughout the communities of the district, in order to realize the full array of benefits that water efficiency and conservation can provide.	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the feedback for the referenced Plan item.
2) Measure: How will we know if investments are effective? How do we know if we are actually securing water savings through water efficiency investments? We need metrics to tell us where we should invest (e.g. what types of water efficiency programs to pursue in certain communities or water systems), and we need to track those metrics.	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the feedback for the referenced Plan item.
3) Research: In addition to the following suggestion (below) regarding researching demand trends, we need to study closely what programs will get us the water savings we want and need. This is critical to intelligent investing and policy-making.	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the feedback for the referenced Plan item.
<ul style="list-style-type: none"> Section 5.2.1.: The statement that "These [water conservation] efforts have resulted in a 30 percent reduction in per capita water use in the District since 2000" is incomplete and misleading, and may lead member utilities toward incorrect assumptions about recent water demand trends and the current status and impact of conservation efforts. Although the District has performed analysis of demand trends, as described in the plan, I strongly suggest that this section of the plan also make reference to Water Research Foundation project #4458, "Water Demand Forecasting in Uncertain Times: Isolating the Effects of the Great Recession" (Kiefer et al. 2016). The GAWP Operator magazine published an article summarizing this research in Summer 2016, which rightly noted its relevance for Georgia water utilities. We would do well to perform this kind of research on Georgia and/or the Metro Atlanta area. It is more important than ever to have a clear-eyed view of the various impacts on demand trends in recent years, and the effects of both drought and recession are certainly as pronounced in Georgia as perhaps anywhere in the country over the past 15 years. Conservation efforts are a big part of the story, but they are not the whole story; the District and member utilities must work with a more complete base of information than is represented in the introduction to this section of the plan. 	- The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<ul style="list-style-type: none"> It is good that the District is focusing on commercial water use in particular. There is likely significant potential for additional water savings in this sector across the metro area. The more that can be done here, the better. 	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Plan item.
<ul style="list-style-type: none"> On the topic of highly treated wastewater: The principles of integrated water management would say that on the regional scale, and with both environmental and community benefits in-District and downstream in mind, going beyond merely meeting GA EPD's requirements for assimilative capacity is called for. That is, utilities should aim for higher levels of treatment for better water quality. 	- The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
In addition, the District's call for increased return flows of highly treated wastewater, which I support, needs to be cross-referenced with this guidance in integrated fashion. While increasing return flows will have benefit for water quantity in streams, we need to avoid any adverse impacts on water quality if the treatment level in these discharges is not sufficient to maintain water quality in what are still small streams and small rivers district-wide.	- The Metro Water District Governing Board Working Group has reviewed the comment. No action will be taken to change the Plan.
<ul style="list-style-type: none"> The Technical Assistance Program is a welcome development and should serve the plan, the District, member utilities and local water resources well. 	- The Metro Water District Governing Board Working Group has reviewed this comment and appreciates the support for the referenced Technical Assistance Program.
Grease Management Program (Sec 5.3 – WW-7, page 5-93). Under the "Considerations for Enhanced Implementation" regarding incentives for grease interceptor installation on multifamily properties, the third bullet states that "Utility operations experience indicates that SSO's due to grease buildup and blockage is most prevalent downstream from multifamily usage." Do you have actual data points on the prevalence of FOG related SSO's attributed to multifamily that you could share with us? I only ask because as we have been digging into this issue in DeKalb, we actually analyzed the SSO data over the last 5 years and found that less than 30% of grease related SSO's occurred within a ½ mile of a multifamily property. I also know that DeKalb is certainly a unique system, so any data that exists on this issue would be helpful as we work to find the best management practices for FOG on multifamily communities regionally.	The sentence will be changed to state "Utility operations experience indicates that SSO's due to grease buildup and blockage is most prevalent downstream from areas of concentrated development"

Comment	Response
<p>Letter to Chairman Austin: Dear Chairman Austin, The Board of Directors of the Cherokee County Water & Sewerage Authority wishes to express to you our deep concern that no cost versus benefit analysis has been performed on the action items proposed in the 2017 MNGWPD draft Plan. Implementation of the proposed action items entails administrative, capital, monitoring, and operations and maintenance costs, potentially significant in amount, the burden of which falls upon utility customers and county/city taxpayers. It is obligatory that the potential costs and benefits of the various proposed action items be evaluated to ascertain a positive benefit in excess of the costs. As we pursue increased water use efficiency and conservation we must be vigilant in efficient, conservative use of our financial resources.</p> <p>The Board of Directors of the Cherokee County Water & Sewerage Authority requests that you and the MNGWPD Board instruct District staff to identify 10-15% of the action items (action items to be selected equitably from Integrated Water Resource Management, Water Supply and Water Conservation, Wastewater Management, Watershed Management, and Public Education planning areas) proposed in the 2017 MNGWPD draft Plan on which to perform cost versus benefit analysis. We request the analyses be completed to coincide with the public comment period for the draft Plan. We further request that the MNGWPD Board receive the analyses results in sufficient time prior to the June 7, 2017 MNGWPD Board meeting at which they will consider approval of the 2017 Plan.</p> <p>We appreciate your prompt attention to this important matter. Contact us if you wish to discuss any aspect of this request.</p> <p>Mike Byrd <u>Chairman, Cherokee County Water and Sewerage Authority</u></p>	<p>Letter response from Chairman Austin: Dear Mr. Byrd, We received your letter requesting a cost/benefit analysis on a certain percentage of the action items within the Draft Plan Update. I appreciate and understand your concern; however, at our March 22, 2017 regular meeting, the District Governing Board discussed and concluded that this type of analysis would not be included as a part of the 2017 Plan Update. For the past three years, the proposed actions have been discussed and debated at length, including reviews by the Basin Advisory Councils, Technical Coordinating Committees, Governing Board Working Group, and the Governing Board itself.</p> <p>Flexibility is included in many action items and is the hallmark of this plan and the previous two District Plans. It is an absolute necessity when dealing with 110 local governments and more than 50 utilities. One size does not fit all, and the cost of implementation will vary by jurisdiction—just as the benefits will vary from one to the other. This flexibility allows each entity to direct its resources to serve its needs while maintaining compliance with the minimum plan requirements. Quantifying the full range of potential costs and benefits will take greater time and resources than we have available.</p> <p>Further, when evaluating the impact an action item may have in a jurisdiction, we must take into account its value to the many intangible elements identified in the District Law—including water supply, recreation, fish and wildlife habitat, economic prosperity, and quality of life. To conduct a true cost/benefit analysis, the District cannot look only at the economic value of implementation, but those others which are more difficult to quantify. Again, this type of assessment will take more time and resources than we have available.</p> <p>I appreciate your concerns, and welcome your input. However, the Board has already determined that it will consider cost estimates for future Plan Updates, but not for the 2017 Plan Update.</p>
<p>Middle Cattaahoochee River Basin Profile, Page MC-6, Table MC-4 and associated narrative should indicate that sources are existing resources only. Please add term "existing" or "current" sources.</p>	<p>The complete list of existing reservoirs is covered in Table 3-1 of the Water Resource Management Plan and is titled with the word "Existing." Additionally, future proposed reservoirs are discussed in Section 5.2.3 under 2050 Planned Resources.</p>