



# GAEPD Comments on Lower Flint-Ochlockonee October 15<sup>th</sup> Draft Water Development and Conservation Plan

# Comment Memo Summary

GAEPD comment memo emphasizes comments focused on adoptability and implementation

- PC's have notes on more specific comments from meetings with GAEPD
- Comments focus on Sections 6-8 (comments on August draft focused on Sections 1-5)

GAEPD emphasis on:

- Document management practices and responsible parties as clearly as possible
- Define benchmarks for implementation that will measure effectiveness and progress in addressing gaps



# General Comments

Coordination with existing plans:

- Local and regional comprehensive plans
- State energy plan
- Watershed management plans

Describe management practices clearly and specifically:

- Why selected
- How link to resource assessment/gaps
- Who, when, etc.



# Section 6 Comments

- Quantify how management practices will address gaps (where possible)
- Address information gaps with recommendations for data collection and analysis to improve specificity of management practices and to support future planning
- Prioritize management practices for implementation

# Section 7 Comments

- Be more specific about entities responsible for implementing management practices
- Clarify priorities of management practices
  - Detail Council's consideration of feasibility (technical, political, affordability) and effectiveness
  - Reflect Council's consideration of financial and environmental costs of management practices.
- For actions identified for state entities, state what Council objective(s) that the action will support (per Section 14(7)(c)(xiii) of State Water Plan).
- Strongly consider adding eligible water quality projects as management practices to receive CWA Section 319 funds made available by GAEPD.

# Section 8 Comments

- Include benchmarks that can be used to assess progress and effectiveness
  - Select qualitative and quantitative benchmarks that can help to assess whether management practices are closing gaps and supporting attainment of Council vision and goals over time.
- Include benchmarks that measure progress relative to water use and environmental outcomes (i.e., not just implementation actions).
- Group benchmarks by categories where possible (e.g., implementing party, types of management practice, geographic area).

# Other GAEPD Suggestions

- Borrow from other councils' plans
- Discuss lack of baseline information on implementation of conservation practices and how it affects the ability to evaluate extent (and cost) of future implementation needed.
- Explain the portfolio of MPs: how it fits together to address gaps
- Specify geographic coverage of management practices, where applicable
- GAEPD will provide guidance on how to address future actions by Councils consistently
- Discuss more thoroughly how to evaluate the adverse impacts of identified gaps
- Add conclusion to Section 8 that ties plan together (linking goals, vision, management practices, expected outcomes)

# Other GAEPD Suggestions

## Water Quality:

- Make sure that the Water Quality assumptions about where future discharges will go are evaluated by the Council
- Add information on GA Forestry Commission on BMP implementation by forestry operations
- Consider adding a management practice that would implement a BMP tracking and complaint response program for agriculture (like that implemented by the GA Forestry Commission for forestry)
- Consider adding a management practice that would develop a monitoring network including local water systems that are implementing watershed assessment plans
- Be more specific about how to increase water quality monitoring



# Other GAEPD Suggestions

Formatting:

- Number management practices
- Carry table headings over to each new page of a table