



United States Department of the Interior Fish and Wildlife Service

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May 17, 2023

State of Georgia Water Planning Division
Regional Water Planning Councils
Via water.planning@dnr.ga.gov

Re: Comments on Draft Updated Regional Water Plans

Dear Regional Water Planning Councils:

Thank you for the opportunity to review State of Georgia Water Planning Division's Draft Regional Water Plans, updated in March 2023. We submit the following comments under provisions of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531, *et seq.*) and the Fish and Wildlife Coordination Act (FWCA) (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*).

General Comments on all 10 Regional Water Plans:

Along with the State of Georgia Water Planning Division, we share your endeavor that all Georgians have the right to enjoy safe and sustainable water resources, while safeguarding our rivers and natural ecosystems for generations to come. By function of this letter, we invite the Regional Water Planning Councils to include our agency into your water planning efforts so that we may assist with development of projects that consider effects to natural habitats, threatened and endangered species, and other fish and wildlife resources.

- We recommend Regional Water Plans address the State Wildlife Action Plan (SWAP) High Priority Habitats, High Priority Species, and High Priority Conservation Actions within each area thoroughly and uniformly.
- All Plans should contain up-to-date numbers of species of Conservation Concern tracked by the Georgia Natural Heritage Program. For example, within the 16-county area of the Altamaha Water Plan, there are 202 Georgia Biotics tracked plants and animals, 65 Georgia Protected plants and animals, 12 tracked natural communities, and seven tracked mollusks. A list of the species for each of the Regional Plan areas can be obtained through the Environmental Review, Wildlife Conservation Section, Wildlife Resources Division,

Georgia Department of Natural Resources (<https://georgiawildlife.com/environmental-review>).

- All Plans should contain up-to-date species and habitats protected under the Endangered Species Act. In **Appendix 1**, we provide information regarding federally listed species and critical habitats that occur in each region for further consideration. For the most up-to-date information, please request lists using the Service's free and publicly available Information for Planning and Consultation (IPaC) system (<https://ipac.ecosphere.fws.gov/>).
- All Plans should address Clean Water Act Section 303(d) impaired waters and objectives to bring impaired waters into compliance for the benefit of the community and ecological health in the water regions.

Comments on Draft Altamaha Regional Water Plan:

In the Altamaha Plan, there is some discussion of the High Priority Habitats (incl .streams and watersheds) and a vague mention of High Priority Species. The Regional Water Plans should address the SWAP: 1) High Priority Habitats; 2) High Priority Species; and 3) High Priority Conservation Actions within the Plan Areas both thoroughly and uniformly. The Altamaha Plan cites a Nature Conservancy 2007 reference which does not appear in the bibliography.

Comments on Draft Coosa North Georgia Regional Water Plan:

It would be beneficial to support studies focused on how to incorporate flow and water level benchmarks protective of sensitive fishes and their spawning habitat in this planning region. More specifically, the Conasauga and Etowah watersheds support many sensitive and at-risk aquatic species in which these thresholds would be instrumental in improving management outcomes and ecological health.

Comments on Draft Upper Oconee Regional Plan:

The Draft Upper Oconee Regional Plan provides a good example of how to incorporate flow and water level benchmarks protective of sensitive fishes and their spawning habitat (page 57) based on research conducted by the [Georgia Water Planning and Policy Center](#) and funded by a Seeds Grant. These efforts are critical to inform withdrawal thresholds protective of aquatic life. For example, Freeman and Marcinek (2006) found that " streams in the lower Piedmont may begin to experience species losses if permitted withdrawal exceeds about 0.5 to one 7Q10-equivalent of water."

Thank you for the opportunity to provide comments. We appreciate your efforts to conserve Georgia's water resources.

Sincerely,

Peter D. Maholland
Field Supervisor
Georgia Ecological Services