

Response to Comments on Proposed Changes to Section 14 of State Water Plan
December 2025

#	Comment	Response
1	A commenter does not recommend reducing the size of the Councils from 25 to 15; recommends further diversifying the members of the Council beyond water users, to include non-governmental, non-profit organizations	The recommendation to reduce Council appointments to 15 was made in consideration of the time necessary for the robust appointment process. There are no restrictions set forth in the State Water Plan to prohibit representatives from other sectors (NGO, environmental, tourism, recreation, etc.) from being recommended for appointment.
2	Commenter requested changing “agriculture” in sub-section (3)(c)(ii) to “agriculture/silviculture” to include timber managers or tree farmers; add 2 additional guaranteed appointees for “tourism and recreation” and “environmental and conservation interests” in sub-section (3)(c)(iii) for their valuable knowledge and perspectives; recommend that EPD develop a transparent nomination and recommendation process for appointing RWP Council members	<p>Agricultural water demand forecasts cover irrigation for row and orchard crops as well as most vegetable and specialty crops and account for more than 95% of Georgia's irrigated land. Additionally, estimates of current use are made for animal agriculture, horticultural nurseries, and greenhouses. Silviculture is not a regulated or metered user. No change made.</p> <p>Please see comment response #1 regarding additional guaranteed appointees.</p> <p>Comment noted on process transparency. EPD will work on enhanced transparency regarding nominations and recommendations outside of this Plan update.</p>

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3	<p>Commenter does not support decreasing the number of Council members, but suggests adding the House and Senate Minority Leaders as additional appointing authorities; suggested language be added to paragraph (7) related to Council outreach to local governments as a way to increase awareness of, and feedback to, the RWPs; recommended the legislature provide an implementation funding budget</p>	<p>Please see comment response #1.</p> <p>The recommendation of alternate appointing authorities would not reduce the resources necessary on the part of state agencies or water councils to identify, review, and nominate council members. As a result, the change does not address one of the drivers of the proposed reduction in council appointments. No change made.</p> <p>EPD will work with the planning contractors to increase outreach to local governments. No change made.</p> <p>The legislature provides annual appropriations to EPD to support the RWP process, and EPD established the Seed Grant program to provide state funding for RWP management practice implementation from those funds. Additional information on the grant program can be found at https://epd.georgia.gov/public-announcements-0/outreach/grants/regional-water-plan-seed-grant-funds</p>
4	<p>Commenter supports the change to clarify EPD’s role in the RWP process in Section 14(3)b; does not support reducing the number of Council members, stating that Councils need “sufficient membership to</p>	<p>Please see comment response #1.</p>

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	accommodate the full range of stakeholder interests present in each” region; suggests changes to Council facilitation and the recruitment process for new Council members could address the challenge of meeting quorum	EPD is happy to entertain any specific suggestions for enhanced facilitation or recruitment efforts. The commenter did not provide specific input, but EPD welcomes future discussions on this topic. No change made.
5	Commenter suggested using the DNR Board as backup to the elected officials for appointments and monitoring attendance for a rolling 2 year period at a certain percentage (50%) for attendance requirements; suggested an attendance requirement, and those who fall below a certain percentage of attendance over a 2-year timespan be up for replacement; suggested a default procedure for those who are not appointed within 6 months of the expiration of a term be appointed by the DNR Board instead	The recommendations for alternate appointing authorities and attendance requirements would not reduce the resources necessary on the part of state agencies or water councils to identify, review, and nominate council members. As a result, the change does not address one of the drivers of the proposed reduction in council appointments. No change made.
6	Commenter is concerned about only having 13 voting members and 2 non-voting members, and having about 30% be elected officials; feels may need to utilize non-voting members to form working committees; stated the proposed changes will end up being stressful for the Council; acknowledged how important elected officials are to the process, but suggested that support from the Governor’s office or others would be helpful for stressing how important the Council’s work is; concerned about being able to remove non-participating members from the Council, particularly the elected officials that aren’t likely to attend meetings; also expressed concern over timeliness of appointments and whether appointments realistically can be done on a 6-year timeframe	Working committees have been proven to be an effective method to gather input from diverse stakeholders to inform the RWP Plan development process. Additionally, Section (3)f.iv. directs the RWP Councils to establish procedures to provide opportunities for meaningful public participation in plan development including specifications for other advisory bodies. Several RWP Council Operating Procedure documents reflect the option for elected

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		<p>officials, or any member, to select a proxy to attend meetings to engage in active dialogue and conversation on their behalf.</p> <p>Remaining comments noted. No change made.</p>
7	<p>Commenter recommended having folks with experience in landscape/outdoor water use on the RWP Councils due to “huge economic impact to the landscape industry and growers if we don’t have thoughtful leaders engaged in the and planning”; stated his belief that “the landscape sector is almost always the first thought for water use restrictions”</p>	<p>There are no restrictions set forth in the State Water Plan to prohibit representatives from other entities being recommended for appointment.</p> <p>No change made.</p>
8	<p>Commenter expressed concern that decreasing Council membership from 25 to 15 will “substantially decrease the breadth of perspectives brought to deliberations by the Councils, which has repeatedly been cited by Council members as one of the strengths of the process” and result in less complete RWP Plans that are less likely to be implemented by water users in each region; stated that a smaller number of Council members will “exacerbate problems with having a quorum at meetings, particularly in larger geographic regions that require more travel time; expressed support for 6 year terms and removing alternates; encouraged State Water Council to maintain a Council size of at least 20 members</p>	<p>Please see comment responses #1 and #6.</p>
9	<p>Commenter supports the proposed changes as a way to streamline and simplify the nomination process, reduce vacancies on the Councils, strengthen the overall vitality of the program, and ensure the timely appointments of new council members; supports designating one appointee for each Council to represent the agricultural industry</p>	<p>Comment noted.</p>

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10	Commenter stated belief that the proposed changes politicize the process, favor corporations water waste, and cut out environmental and small agricultural interests	Comment noted.
11	Commenter expressed concern about the reduction in membership that will result in “reduced representation of the various perspectives” needed for the Council’s discussions and planning; noted the benefit from strong participation by farmers and forest landowners; believes that 6-year terms will lead to more attrition in Council membership and suggests a shorter term or biannual review of membership for new appointments will aid the Councils in maintain active participation; believes the proposed reduction in Council membership is too dramatic and proposes a size of 21 members as a “workable compromise that supports the needs of our Council while reducing the appointments burden”	<p>Please see comment response #7.</p> <p>EPD will continue to work on a process or mechanism to ensure active participation by appointed members. EPD commits to an evaluation of potential mechanisms for removal of inactive members and will work with the RWP Councils on interim steps to ensure comprehensive feedback.</p> <p>No change made.</p>
12	Commenter suggests representation from each County in each region, reducing the terms from 6 years to 4 years (to coincide with terms of elected officials), and providing a means for the dismissal of Council members who do not attend meetings	<p>Due to the large number of counties in some council areas, appointing representatives from each county in a council area will result in significant skewing of the council representation and will exceed the proposed number of total council members, in some instances.</p> <p>The recommendation for 6-year terms was put forth to ensure participation throughout a full planning update cycle (5-years).</p> <p>Please see comment response #11 regarding inactive members.</p>

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		No change made.
13	Commenter expressed concern about excluding certain types of members, including those with environmental concerns or tourism concerns; expressed concern about the proposed changes resulting in the unintended consequence of only having 1 County elected official in some larger regions	<p>Please see comment response #1.</p> <p>Additionally, section (3)a explicitly states “Each council will be broadly representative to include agriculture, forestry, industry, commerce, local governments, water utilities, regional development centers, tourism, recreation and the environment.”</p> <p>Unintended consequence comment noted.</p> <p>No change made.</p>
14	Commenter does not recommend reducing the size of the council from 25 to 15 because it will limit the Council’s ability to plan by limiting variety in backgrounds, create challenges in attaining quorum at meetings, and could lose active members. A recommendation was made to reduce the number from 25 to 21 members to complete the planning work, opening the Ex-officio seats to other types of members due to the lack of attendance, recommends opening the county and city water systems operators be mandatory members selected.	Please see comment responses #1 and #11.
15	Commenter supports the changes to the SWP.	Comment noted.
16	Commenter supports change in number of appointments and to the MOA reference; requests clarification of whether the requirement for a mayor or city council member under paragraph (3)(c)i. could be filled by	Comments of support noted.

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	a person appointed to a local board by a mayor or city council member; expressed concern that elected officials serving a 4-year term who are not reelected to office would not stay active for a 6-year Council appointment term	<p>The requirement for an elected mayor or city council member does not include a person appointed to a local board; a specific response to this inquiry was provided to the commenter via an email response.</p> <p>Please see comment responses #6 and #11.</p>
17	Commenter commented that with 15 members the Councils needed to be well balanced with representation and recommended that at least one member be an environmental representative and one downstream community representative. Recommend rules be set to stop conflict of interest of council members, data be transparent, required cross coordination and joint meetings, set benchmarks on impaired waters, and ensure public are able to attend meetings both in person and virtually.	<p>Please see comment response #1.</p> <p>Whether meetings are virtual, in-person, or hybrid is determined by the respective Council chairs.</p> <p>Joint Council meetings are a current practice. Throughout the regional plan update process, adjacent RWP Councils are called together to hold joint meetings.</p> <p>No change made.</p>
18	Commenter does not recommend reducing the size of the council from 25 to 15 because it will limit the Council's ability to plan by limiting variety in backgrounds, 2 of the 15 members are ex-officio members who do not attend often or vote, the Council has an active number of participants and reducing the number will remove some of those active members and will hurt the Council's ability to plan for the region. A 6-year term will create challenges due to attrition, especially with 13 council members and will cause difficulty achieving quorum.	Please see comment responses #1, #6 and #13.

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	Recommending reducing council size to 21 members and spreading nominations out to House and Senate to lessen burden of appointments. Recommending designated member positions for local elected officials be filled by directors of local utilities or government agencies.	
19	Commenter is concerned that reducing the size of the Council will not adequately represent the four water use sectors.	Ensuring at least one appointment to each Council will be a representative from each of the water use demand forecast sectors is not meant to limit input from those sectors. Additional input can be provided during the public comment portion of Council meetings or during subcommittee or working committee meetings, if established. No change made.
20	Commenter stated new members are too heavy in elected officials who do not attend as frequently, 15 council members is too thin on the knowledge of the water uses, members may feel that are not as important with lower public engagement in the planning process, more elected officials and reduced number of members will make it harder to reach a quorum	Please see comment responses #1 and #6.