



UNIVERSITY OF
GEORGIA
Odum School of Ecology

To: Georgia Department of Natural Resources
Re: Savannah-Upper Ogeechee Regional Water Plan
From: Dr. Amy Rosemond, Distinguished Research Professor, University of Georgia
cc: Governor Brian Kemp (sent via hard copy to the State Capitol address), Lieutenant Governor Burt Jones (sent via email form on the Lieutenant Governor website), Speaker Jon Burns (sent via email)
Date: May 14, 2023

Dear Georgia Department of Natural Resources colleagues, and Governor Kemp, Lieutenant Governor Jones, and Speaker Burns:

Thank you for this opportunity to comment on the draft updated Regional Water Plans for our state. I was asked to serve on Georgia's State Water Plan Scientific and Engineering Advisory Panel in 2008. I applaud the work of Georgia's Environmental Protection Division (EPD) in creating a state water plan, to assess the status of water quality and water quantity, and to continuously improve this process. Ideally, the implementation of the Regional Water Plans will promote wise use of water and make sure that our streams, rivers, and lakes will serve future generations of Georgians.

In my review of the recent draft Regional State Water Plans, I see deficits in the implementation of the State Water Plan, which will likely result in negative impacts on people and water. It is my opinion that unless these deficits are addressed, that Georgia will face serious water shortages and water pollution issues in the future. In addition, the deficits that I outline below do not protect the health and functioning of freshwater systems for all Georgians. I am most familiar with the Upper Oconee Regional Plan because I have studied it in the most detail. But all of the Regional Water Plans have much in common, namely A) the appointment of persons with largely business interests to the Regional Planning Councils, B) water quality issues that are not dealt with adequately in the current plans, and C) the need for more direct feedback between monitoring of aquatic systems and management to protect water quality for future generations. I agree strongly with the recommendation in the draft Altamaha Regional Water Plan that EPD should consider institutionalizing regional planning (p. ES-11 of that plan). In that way, EPD can set benchmarks, monitor progress, and determine whether current management practices are adequate for protecting long-term access to quality water in Georgia. This job needs to be taken on by GA EPD, with more funding and staff, to ensure future success.

Regarding the Savannah-Upper Ogeechee Regional Water Plan:

A. Who are in positions to make decisions about Georgia's water? I am deeply concerned about the representation on the Regional Water Councils, which does not appear to be representative of the state of Georgia and those who depend on water supply and functioning freshwater ecosystems. I have reviewed the names of a few people who have been appointed to the Regional Water Councils. I have found that many appointed council members have business interests in the use of water and do not represent the vast diversity of Georgians who need access to water and unpolluted water bodies. In addition, I haven't been able to determine whether any

council members have expertise dealing with safeguarding the condition of lakes and rivers or have expertise in the fields of water planning, hydrology, engineering, or ecology. I would encourage the appointment of council members who *do not* have business interests with water, who *do* have expertise with water planning and management, and who have diverse experiences with water.

B. There is limited recognition of the current poor condition of Georgia's waters and what each Regional Water Plan will do to address polluted waters and future water use. The regional water plans need to address the realities of water quality in Georgia, that include poor water quality in our lakes, rivers and streams. The EPD 2020 Integrated 305b/303d Report indicates that 58% of river and stream miles are impaired (they are not meeting their designated uses). In the 2022 Integrated 305b/303d Report, that went up slightly, with a reported **60.7% of Georgia's rivers and streams being impaired**. Of Georgia's **lakes and reservoirs, 40.8% are impaired** according to the 2020 report. In many of the Regional Water Plans, Assimilative Capacity of water bodies is already exceeded and there are gaps in projected water supply.

C. More monitoring and oversight is needed to determine whether aquatic systems are declining in quality, given current management. This responsibility ultimately rests with the state of Georgia. It is laudable that many Regional Water Councils have recommended long-term monitoring. The current plans do not address how monitoring will be funded (it needs to be), nor how decision-making from monitoring would take place. This oversight would be more effective if it were under the auspices of, and in fact is the responsibility of, Georgia EPD. Also, more attention needs to be given to extreme weather events (e.g., long-term drought). There needs to be more monitoring and benchmarks in place to ensure that current systems do not decline in quality, that we are planning for extreme events, and that our state EPD has the management tools and personnel to address challenging future water quality and quantity needs.

Thank you again for this opportunity to provide comment on the draft Regional Water Plans.

Sincerely,



Amy D. Rosemond
Distinguished Research Professor