

Appendix C – Response to Written Comments on the Statewide Nonpoint Source Management Plan 2019 Update

Chapter	Summary of Comment	GAEPD Response
General	Recommends highlighting the use of Georgia’s water for drinking water as a means to engage stakeholders.	GAEPD agrees that source water protection is an important goal of nonpoint source pollution control. Language has been added throughout to reflect this.
Agriculture	Recommends adding commodity-specific educational materials and BMP manuals, as well as finding baseline BMP implementation information.	This recommendation was included under long-term goal 2, Agriculture chapter.
Agriculture	Supports the goals related to nutrient and sediment load reductions from agriculture nonpoint sources in the Suwannee River Basin.	Thank you for your comment.
Agriculture	Recommends GSWCC conduct evaluation of agriculture BMP implementation, similar to GFC’s forestry BMP surveys, to better address BMP implementation and effectiveness, and future training needs.	GAEPD has added language to the Agriculture chapter about supporting existing commodity group efforts to increase education, as well as language about sector-specific BMP manuals and surveys. Further work in this arena will be considered by GAEPD and partners during the implementation of the 2019 Statewide Nonpoint Source Management Plan.
Agriculture	Recommends adding an activity in the Agriculture chapter to initiate the revision and update process for Best Management Practices for Georgia Agriculture, last updated in 2013.	Reviewing the document for updates would ensure up-to-date BMP information for the agricultural sector. This activity has been added under long-term goal 2, Agriculture chapter.
Urban	States that GI/LID practices do not operate in a vacuum, so the long-term goal related to tracking research on the performance and effectiveness of GI/LID practices needs to be expanded. Recommends that the collection of cost, performance, installation, and maintenance requirements not exclude conventional practices, especially if they are influencing and/or are influenced by GI/LID practices.	GAEPD agrees that GI/LID practices are often placed in systems that include conventional practices. Language reflecting this has been added to long-term goal 1, Urban – Stormwater section.

Appendix C – Response to Written Comments on the Statewide Nonpoint Source Management Plan 2019 Update

Urban	Agrees that there is a need to build technical capacity for stakeholders in GI/LID. Recommends not focusing on workshops as a metric of success but rather on the development of technical training standards.	As GI/LID practices become more prevalent, stakeholders will need more information about installation, maintenance, and operation. Initial efforts should focus on providing that information and training. GAEPD can evaluate periodically whether the development of technical training standards would provide additional water quality benefits.
Urban	<p>Raised concerns that current setbacks for septic tanks are not sufficiently protective of water quality. Recommends that GAEPD and GADPH review setback requirements for septic systems. Encourages the State to continue to support research on effect of septic systems on water quality.</p> <p>Noted that long-term goals 2 and 3 appear to contradict each other. Recommends removing “if any” from long-term goal 2.</p>	<p>GAEPD will continue to support research into the effect of septic systems on water quality. The results of any 319(h) funded research will be made publicly available and shared with relevant partners.</p> <p>GAEPD seeks to reduce inconsistencies in the Plan. The phrase “if any” has been removed from long-term goal 2, Urban – OSDS section.</p>
Urban	Supports the goals related to buffer protection and urban runoff and hopes they may help reduce flooding and sewage spill problems.	Thank you for your comment.
Urban	Recommends including a Pipeline section in the Plan to address the environmental impacts from the natural gas and petroleum product pipeline construction, including erosion and spread of invasive species.	Land disturbance activities, including activities associated with pipeline construction, are included in the Urban – Land Disturbing Activities section of the Plan. GAEPD has chosen to take a broad approach to the goals around land disturbing activities.
Coast	Request that GAEPD gives very serious consideration to incorporating each of the ideas and proposed activities from the Coastal Nonpoint Source Advisory Committee that is being facilitated by UGA Carl Vinson Institute of Government and CRD.	EPD reviewed each recommendation developed by the Coastal Nonpoint Source Advisory Committee. The Committee completed a robust stakeholder process with regional experts, and their recommendations reflect this process. Except for items that fell outside of the scope of this Plan, all recommendations were incorporated.
Coast	Recommendation to add preface providing context to the coastal long-term goals.	GAEPD has included language to provide context for the Coast chapter and coastal goals.

Appendix C – Response to Written Comments on the Statewide Nonpoint Source Management Plan 2019 Update

Coast	Recommends developing water quality standards for DO that take into account the unique coastal ecosystem and conducting more sampling.	The recommended sampling activity has been incorporated into the plan under the existing long-term goal 1, Coast chapter.
Coast	Recommends developing a coastal addendum to the Better Back Roads Field Manual.  Recommends tracking and prioritizing modified channels (i.e. canals, dams, streams) within the 11-county coastal region and maintain existing hydromodification practices, including channelization and eroding streambanks and shorelines.	The recommendation to include the development of a coastal-specific section in the Better Back Roads Field Manual has been incorporated under the Urban – Dirt Roads section.  The recommendation to address hydromodification has been included under long-term goal 3, Coast chapter.
Coast	Recommends adding an activity to coordinate with GADNR-CRD to update the Clean Marina Program and encourage the development and promotion of a resilient component resulting in the <i>Clean and Resilient Marina Program</i> for facilities located in the 11 coastal counties.	The recommended activity has been added under long-term goal 4, Coast chapter.
Coast	Recommends adding an activity to update the Coastal Stormwater Supplement.	The recommended activity has been added under long-term goal 4, Coast chapter.
Coast	Recommends including a small section in the plan reflecting and encouraging the continuation of focus groups and practitioner meetings for the coastal region.	Long-term goal 5 has been added to the Coast chapter reflecting the benefits of a coastal work group, including increased coordination and more efficient use of resources.
Coast	Recommends adding a long-term goal 5 to develop a consistent, sustainable, regional coastal stormwater education campaign. Recommends including the following activities: research effective messaging campaigns, conduct survey of coastal communities’ capacity and willingness to participate in a regional stormwater educational campaign, and if capacity and willingness exists, develop a structure and appropriate funding mechanisms to create a consistent coastal stormwater message.	The goal and related activities were added to the Coast chapter of the Plan. Some components of the goal matched MS4 permit requirements and were therefore not appropriate for the Statewide Nonpoint Source Management Plan. The recommended activities were revised to focus more on implementation and on the unregulated community.

Appendix C – Response to Written Comments on the Statewide Nonpoint Source Management Plan 2019 Update

Coast	<p>Recommends identifying and creating a coastal training work group to develop and adopt coastal specific training for planning design, BMP maintenance, plan review, construction, monitoring, CSS, BMPs, etc.</p>	<p>The recommended activity has been added under long-term goal 5, Coast chapter.</p>
Water Quality Monitoring Data	<p>Recommends adding additional monthly, preferably weekly, water quality monitoring for fecal coliform, pH, and dissolved oxygen, as well as DNA analysis for markers for human sewage on Georgia Rivers.</p> <p>Recommends posting the water quality monitoring results online as soon as possible after sampling. Notes that many people use Georgia’s rivers, especially on weekends, and this information may be particularly useful then.</p>	<p>Some trend stations and continuous sampling sites exist in Georgia, but their use and scope are limited by resources.</p> <p>GAEPD strives to provide up-to-date monitoring data. The public can use GOMAS to find up-to-date sampling information. Adopt-a-Stream data is available to the public on GAEPD’s website, too.</p>
Water Quality Monitoring Data	<p>Recommends considering the biological significance of the waterbody as part of the prioritization process. Biodiversity metrics or the presence of rare and endemic species, may be a way to capture this biological significance. Points to a mismatch in prioritization of the Upper Conasauga River watershed (important but not a priority in EPD’s prioritization tool, but highest priority in the State Wildlife Action Plan).</p>	<p>Biological significance will be evaluated as a potential prioritization metric. Long-term goal 2, activity 1, in the Water Quality Monitoring Data chapter, has been updated to reflect this.</p>

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<p>Statewide Water Planning</p>	<p>Recommends using a watershed approach to Regional Water Planning instead of using political boundaries. States that the information in the Regional Water Plans is not accurate because of the county-level analysis. Suggests a statewide conservation GIS land prioritization at the watershed level using environmental indicators to more specifically guide watershed scale conservation efforts. Indicates that the Regional Water Plans do not meet the requirements of a 9 Key Element Plan.</p>	<p>The Regional Water Plans, while organized along political boundaries, include assessments based on watersheds.</p> <p>The Regional Water Plans are not intended to be 9 Key Element Plans; however, they can be used as a component of a “Summary of Nine Elements” when paired with other planning documents.</p>
<p>Land Acquisition and Green Space</p>	<p>Recommends explicitly including water trails in the Land Acquisition and Green Space section.</p>	<p>Water trails offer users an opportunity to become familiar with and enjoy their local waterways. An explicit reference to water trails has been added to the Education and Outreach chapter.</p>
<p>Tracking Milestones, Benchmarks, and Timeline</p>	<p>Supports the use of an active planning document with tracking tables.</p>	<p>Thank you for your comment.</p>