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Section 7

Implementation Strategies

This section builds on the priority issues identified in Section 6 and proposes strategies to address the major water quality problems in the Tallapoosa River basin.

Georgia’s Mission Statement for the river basin management planning is “to develop and implement a river basin planning program to protect, enhance, and restore the waters of the State of Georgia, that will provide for effective monitoring, allocation, use, regulation, and management of water resources.” Associated with this mission are a variety of goals that emphasize coordinated planning to meet all applicable local, state, and federal laws, rules, and regulations, and provide for water quality, habitat, and recreation. For the Tallapoosa basin, these goals will be implemented through a combination of a variety of general strategies, which apply across the basin and across the state, and targeted or site-specific strategies. Sections 7.1 and 7.2 describe the strategy development process and the “big picture” management goals for the Tallapoosa River basin. Section 7.3 describes the general and basinwide implementation strategies of most relevance to the Tallapoosa River Basin Management Plan. Targeted strategies for specific priority concerns within each subbasin, as identified in Section 6, are then presented in Section 7.3.

7.1 “Big Picture” Overview for the Tallapoosa River Basin

This Tallapoosa River basin Management Plan includes strategies to address a number of different basinwide objectives. These include

- Protecting water quality in lakes, rivers and streams through attainment of water quality standards and support for designated uses.
- Providing adequate, high-quality water supply for municipal, agricultural, industrial, and other human activities.
- Preserving habitat suitable for the support of healthy aquatic and riparian ecosystems.

- Protecting human health and welfare through prevention of water borne disease; minimizing risk from contaminated fish tissue, and reducing risks from flooding.
- Ensuring opportunities for economic growth, development, and recreation in the region.

Achieving these objectives is the responsibility of a variety of state and federal agencies, local governments, business, industry, and individual citizens. Coordination between partners is difficult, and impacts of actions in one locale by one partner on conditions elsewhere in the basin are not always understood or considered. River Basin Management Planning (RBMP) is an attempt to bring together stakeholders in the basin to increase coordination and to provide a mechanism for communication and consideration of actions on a broad scale to support water resource objectives for the entire basin. RBMP provides the framework to begin to understand the consequences of local decisions on basinwide water resources.

RBMP, begun in 1993, is changing the way EPD and other state agencies do business. At the same time, local government comprehensive planning requirements require a higher degree of effort and awareness by local governments to address resource protection and planning for the future.

This plan presents general broad-scale goals and strategies for addressing the most significant existing and future water quality and quantity issues within the Tallapoosa basin. The basin plan provides a whole-basin framework for appropriate local initiatives and controls, but cannot specify all the individual local efforts which will be required. The basin plan will, however, provide a context and general management goals for the local-scale plans needed to address local-scale nonpoint loads in detail. EPD expects local governments and agencies to take the initiative to develop local strategies consistent with the basin-scale strategies presented in this plan.

A number of concerns identified in this plan will affect planning and decision-making by local governments, state agencies, and business interests. Detailed strategies for addressing identified concerns are presented in Section 7.4. This section provides an overview of the key “big picture” issues and planning opportunities in the Tallapoosa River basin.

7.1.1 Water Quality Overview

As discussed in Section 5, water quality in the Tallapoosa River basin is generally good at this time, although problems remain to be addressed and proactive planning is needed to protect water quality into the future. Many actions have already been taken to protect water quality. Programs implemented by federal, state, and local governments, farmers, foresters, and other individuals have greatly helped to protect and improve water quality in the basin over the past twenty years. Streams are no longer dominated by untreated or partially treated sewage or industrial discharges, which resulted in impaired aquatic life. For the most part, local government and industrial wastewaters are properly treated, and fish populations are have returned.

The primary source of pollution that continues to affect waters of the Tallapoosa River basin results from nonpoint sources. Key types of nonpoint source pollution impairing or threatening water quality in the Tallapoosa River basin include erosion and sedimentation, bacteria from urban and rural nonpoint sources, metals from urban and rural sources, and excess nutrient loads. These problems result from the cumulative effect of the activities of many individual landowners or managers. Population is growing every year, increasing the potential risks from nonpoint sources. Growth is essential to the economic health of the Tallapoosa River basin, yet growth without proper

land use planning and implementation of best management practices to protect streams and rivers can create harmful impacts on the environment.

Because there are so many small sources of nonpoint loading spread throughout the watershed, nonpoint sources of pollution cannot effectively be controlled by state agency permitting and enforcement, even where regulatory authority exists. Rather, control of nonpoint loading will require the cooperative efforts of many partners, including state and federal agencies, individual landowners, agricultural and forestry interests, local county and municipal governments, and Regional Development Centers. A combination of regulatory and voluntary land management practices will be necessary to maintain and improve the water quality of rivers, streams, and lakes in the Tallapoosa River basin.

Key Actions by EPD

The Georgia EPD's Water Protection Branch has responsibility for the establishing of water quality standards, water quality monitoring, river basin planning, water quality modeling, permitting and enforcement of point source NPDES permits, and development of total maximum daily loads (TMDLs) where ongoing actions are not sufficient to achieve water quality standards. Much of this work is regulatory. EPD is also one of several agencies responsible for facilitating, planning, and educating the public about management of nonpoint source pollution. Nonpoint source programs implemented by Georgia and by other states across the nation are voluntary in nature. The Georgia EPD Water Resources Branch regulates the use of Georgia's surface and ground water resources for municipal and agricultural uses, which includes source water assessment and protection activities in compliance with the Safe Drinking Water Act.

Actions being taken by EPD at the state level to address water quality problems in the Tallapoosa River Basin include the following:

- **Watershed Assessments and Watershed Protection Implementation Plans.** When local governments propose to expand an existing wastewater facility, or propose a new facility with a design flow greater than 0.5 million gallons per day, EPD requires a comprehensive watershed assessment and development of a watershed protection implementation plan. The watershed assessment includes monitoring and assessment of current water quality and land use in the watershed and evaluation of the impacts of future land use changes. A watershed protection implementation plan includes specific strategies such as land use plans and local actions designed to ensure that existing problems are being addressed and that future development will be conducted in a way to prevent water quality standards violations.
- **Total Maximum Daily Loads.** Where water quality sampling has documented standards violations and ongoing actions are not sufficient to achieve water quality standards in a 2-year period, a TMDL will be established for a specific pollutant on the specific stream segment in accordance with EPA guidance. The TMDL will specify the allowable loading of a pollutant from both point and nonpoint sources. EPD will implement TMDLs through a watershed approach using a combination of regulatory and nonregulatory tools.
- **Source Water Protection.** Most of the public water supply in the Tallapoosa basin is drawn from surface water. To provide for the protection of public water supplies, Georgia EPD is developing a Source Water Assessment Program in alignment with the 1996 amendments to the Safe Drinking Water Act and corresponding recent EPA initiatives. This new initiative is expected to result in assessments of threats to drinking water supplies and, ultimately, local Source Water Protection Plans. Recent "Criteria for Watershed Protection" (a subsection of the Rules for Environmental Planning Criteria) produced by the

Department of Community Affairs set minimum guidelines for protection of watersheds above “governmentally owned” water supply intakes.

Key Actions by Resource Management Agencies

Nonpoint source pollution from agriculture and forestry activities in Georgia is managed and controlled with a statewide nonregulatory approach. This approach is based on cooperative partnerships with various agencies and a variety of programs.

Agriculture in the Tallapoosa River basin is primarily restricted to livestock and poultry operations. About 21 percent of the basin land areas is in agricultural use. Key partners for controlling agricultural nonpoint source pollution are the Soil and Water Conservation Districts, the Georgia Soil and Water Conservation Commission, and the USDA Natural Resources Conservation Service. These partners promote the use of environmentally sound best management practices (BMPs) through education, demonstration projects, and financial assistance. In addition to incentive payments and cost-sharing for BMPs, three major conservation programs from USDA will be available to producers and rural landowners. These are the Conservation Reserve Program, which protects highly erodible and environmentally sensitive land; the Wetland Reserve Program, designed to protect, restore, and enhance wetlands with cost-share incentives; and the Wildlife Habitat Incentives Program, which will help landowners develop and improve wildlife habitat.

Forestry is a major part of the economy in the Tallapoosa basin, and commercial forest lands represent about 70 percent of the total basin land area. The Georgia Forestry Commission (GFC) is the lead agency for controlling silvicultural nonpoint source pollution. The GFC develops forestry practice guidelines, encourages BMP implementation, conducts education, investigates and mediates complaints involving forestry operations, and conducts BMP compliance surveys. Recently, the State Board of Registration for Foresters adopted procedures to sanction or revoke the licenses of foresters involved in unresolved complaints where the lack of BMP implementation has resulted in water quality violations.

Key Actions by Local Governments

Addressing water quality problems resulting from nonpoint source pollution will primarily depend on actions taken at the local level. Particularly for nonpoint sources associated with urban and residential development, it is only at the local level that regulatory authority exists for zoning and land use planning, control of erosion and sedimentation from construction activities, and regulation of septic systems.

Local governments are increasingly focusing on water resources issues. In many cases, the existence of high-quality water has not been recognized and managed as an economic resource by local governments. That situation is now changing due to a variety of factors, including increased public awareness; high levels of population growth in many areas, resulting in a need for comprehensive planning; recognition that high-quality water supplies are limited; and new state-level actions and requirements. The latter include:

- Requirements for Watershed Assessments and Watershed Protection Implementation Plans when permits for expanded or new municipal wastewater discharges are requested.
- Development of Source Water Protection Plans to protect public drinking water supplies.

- Requirements for local comprehensive planning, including protection of natural and water resources, as promulgated by the Georgia Department of Community Affairs.

It is the responsibility of local governments to implement planning for future development that takes into account management and protection of the water quality of rivers, streams, and lakes within their jurisdiction. One of the most important actions local governments should take to ensure recognition of local needs while protecting water resources is to participate in the basin planning process, either directly or through Regional Development Centers.

7.1.2 Water Quantity Overview

In addition to protecting water quality, it is essential to plan for water supply in the Tallapoosa River basin. The Georgia EPD's Water Resources Branch regulates the use of Georgia's surface and ground water resources for municipal and agricultural uses and is responsible for ensuring sufficient instream flows are available during a critical drought condition to meet permitted withdrawal requirements without significant impact on the environment. The withdrawal permit process must not overuse the available resources. The Water Resources Branch is also responsible for regulation of public water systems for compliance with the Safe Drinking Water Act, as well as regulation of dams for compliance with the Safe Dams Act.

Water quantity concerns in the Tallapoosa River Basin are driven by the extreme low flows that have occurred during past droughts. Public water supplies in the basin are dependent on surface water, but basin characteristics create a situation in which drought flows may be very low. Water supply in the Tallapoosa basin will not be sufficient in the long term (year 2020 and beyond) to meet expected municipal/industrial and agricultural water demands unless water is either imported from another basin or additional storage is provided.

The West Georgia Regional Water Authority is leading the effort to develop a proposed major regional reservoir project in the Tallapoosa Basin. This proposed reservoir could supply water to Haralson, Carroll, Paulding, Douglas and Polk counties. While the proposed project would be built in the Tallapoosa basin, it could potentially provide water to portions of the Coosa, Tallapoosa and Chattahoochee basins.

Although interbasin diversions are not prohibited within Georgia, the Rules for Water Quality Control do require EPD to proceed in the following manner before making decisions regarding such transfers:

1. Give due consideration to existing competing uses that might be affected by such transfers.
2. Issue a press release that describes the proposed transfer.
3. If the public interest expressed in reaction to the press release is sufficient to warrant a public hearing, hold a hearing to receive comments on the proposed transfer prior to making a final decision.

ACT/ACF Allocations

Water quantity within the Tallapoosa basin is also subject to interstate agreements. In 1990 the state of Alabama, concerned about the availability of water for its future needs, filed suit in U.S. District Court to prevent the Corps of Engineers (USACE) from reallocating water from Lakes Lanier, Carters, and Allatoona to increase the water supply for metropolitan Atlanta; Florida later joined this suit. Under a letter of agreement signed by the three states and the Corps, the ACT/ACF (Alabama- Tallapoosa-

Tallapoosa/Apalachicola-Chattahoochee-Flint) Comprehensive Study was initiated in 1991. In 1997, the three state legislatures approved separate interstate compacts that establish the legal and functional basis for future management of the ACT and ACF basins. The President signed the compacts on November 20, 1997.

The compacts require that water allocations be developed before the end of 1998. Obviously, the allocation for the ACT basin will have a potentially significant effect on water resource planning in the Tallapoosa basin in Georgia. It is expected that the allocation will establish some form of a commitment for Georgia to allow certain quantities of water to pass downstream for use by Alabama. Such a commitment will not establish how the water may be used within Georgia; those decisions will remain the prerogative of Georgia's governments and citizens. It is possible, however, that there might be limitations on quantities of water available for various uses in the Tallapoosa basin.

In cases where there is competition for water across water use categories (i.e., water held in lakes for recreation vs. withdrawals for potable uses), Georgia law requires that priority be given to water for human consumption. However, it is far more likely that the competition for scarce water will not be across water use categories so much as between adjoining jurisdictions. In such instances, EPD currently does (and will continue to) encourage cooperative efforts to develop and effectively use limited water resources. Although cooperative intergovernmental approaches are much preferred in addressing such competition, the fact that the Director of EPD has the statutory authority to make final decisions regarding water withdrawal applications means that EPD will assist in resolving such matters if other efforts fail.

7.2 General Basinwide Management Strategies

Many statewide programs and strategies play an important role in the maintenance and protection of water quality in the Tallapoosa basin. These general strategies are applicable throughout the basin to address both point and nonpoint sources.

7.2.1 General Surface Water Protection Strategies

Antidegradation

The state of Georgia considers all waters of the state as high-quality waters and applies a stringent level of protection for each waterbody. Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6-03(2)(b), contains specific antidegradation provisions as follows:

(b) Those waters in the State whose existing quality is better than the minimum levels established in standards on the date standards become effective will be maintained at high quality; with the State having the power to authorize new developments, when it has been affirmatively demonstrated to the State that a change is justifiable to provide necessary social or economic development and provided further that the level of treatment required is the highest and best practicable under existing technology to protect existing beneficial water uses. Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected. All requirements in the Federal Regulations, 40 CFR 131.12, will be achieved before lowering of water quality is allowed for high-quality water.

The antidegradation review process is triggered when a new or expanded point source discharge that might have some effect on surface water quality is proposed. Such proposals are reviewed to determine if the new discharge is justifiable to provide

necessary social or economic development and that the level of treatment required is the highest and best practicable under existing technology to protect existing beneficial water uses.

Applicants for new or expanded point source discharges into any surface water must perform an alternative analysis comparing the proposed discharge alternative to a “no-discharge” land application or urban reuse alternative. The application for discharge to surface waters will be considered only if the less degrading alternatives are determined to be economically or technically infeasible. In all cases, existing instream water uses and the level of water quality necessary to protect the existing use must be maintained and protected.

Water Supply Watershed Protection Strategy

As population continues to increase within the Tallapoosa River basin, it will become ever more important to protect the water quality of already developed raw water sources. EPD is acting in concert with the Department of Community Affairs to produce a set of “guidelines” that define, among other things, measures local governments are encouraged to take to protect drinking water sources. The “guidelines” are entitled Rules for Environmental Planning Criteria, and they establish environmental protection criteria for five environmental categories—water supply watersheds, ground water recharge areas, mountains, river corridors, and wetlands. The Criteria for Watershed Protection (a subsection of the Rules for Environmental Planning Criteria) set minimum guidelines for protection of watersheds above “governmentally owned” water supply intakes. The degree of protection depends on the size of the watershed; watersheds with drainage areas of less than 100 square miles are subject to more strict criteria, as summarized below:

- Impervious surface densities limited to 25 percent over the entire watershed.
- Buffer/setback requirements equal to 100/150 feet within a 7-mile radius of the intake and 50/75 feet outside the 7-mile radius.
- A reservoir management plan (including a 150-foot buffer around the perimeter of the reservoir).

Watersheds with drainage areas of 100 square miles or more are subject to less strict criteria, as summarized below:

- An intake on a flowing stream (as opposed to being located within a reservoir) will have no specified minimum criteria.
- An intake with a water supply reservoir will have a minimum of 100 feet natural buffer within a 7-mile radius of the reservoir, and no impervious cover constructed within a 150-foot setback area on both banks of the stream.

EPD is also actively working toward meeting the national goal that, by the year 2005, 60 percent of the population served by community water systems will receive their water from systems with source water protection programs (SWPP) in place under both wellhead protection and watershed protection programs. EPD intends to accomplish this goal by developing and implementing a source water assessment program (SWAP) in alignment with EPA’s initiatives.

Although the procedures and strategies of the new program are incomplete to date, the Drinking Water Program will compile a statewide source water assessment plan soliciting input from the public and approval from EPA. The plan will specify how the state will delineate areas providing source waters for public water systems, identify origins of contaminants in delineated areas, determine the susceptibility of public water sources to the contaminants, and provide the basis for local individual source water protection plans for each different public water system. Once the statewide plan is approved, the DWP

will be allowed the flexibility to help complete the local source water protection plans for contracted public water systems and provide financial and technical assistance to help develop long-range source water protection strategies for the public water system. The source water assessment program will build on EPD's other assessment and prevention programs, including the Well Head Protection Program and the Vulnerability Assessment and Waiver Program, by soliciting active public participation from the local communities and will assist in the preparation of the local water system's protection plan.

Total Maximum Daily Loads

Section 303(d) of the Clean Water Act (CWA) establishes the TMDL process as a tool to implement water quality standards. Georgia is required by the CWA to identify and list waterbodies where water quality standards are not met following the application of technology based controls, and to establish TMDLs for the listed stream segments. The USEPA is required to approve or disapprove Georgia's 303(d) list of waters and TMDLs.

The most recent requirement for 303(d) list submittal occurred in 1998. Georgia submitted a draft 303(d) list to EPA in February 1998. EPA reviewed the Georgia submittal and provided comments in March 1998. Georgia submitted a final 303(d) listing to EPA on April 1, 1998.

Georgia's 1998 303(d) listing is based on the Georgia 305(b) water quality assessments. The 305(b) assessment is presented in the report *Water Quality in Georgia, 1996-1997*. The 305(b) assessment tables are reprinted in Appendix E of this report. The tables provide a code indicating the 303(d) listing status of assessed segments within the Tallapoosa River basin. An explanation of the codes is given below. An "X" in the 303(d) column indicates the segment is on the Georgia 303(d) list.

- 1 Segments identified as not supporting or partially supporting designated uses where actions have been taken and compliance with water quality standards achieved. These segments are not part of the Georgia 303(d) list.
- 2 Segments identified as not supporting or partially supporting designated uses where existing enforceable state, local, or federal requirements are expected to lead to attainment of water quality standards without additional control strategies. These segments are not part of the Georgia 303(d) list.
- 3 Segments where TMDLs were completed and approved by EPA in 1998.
- X Waters with active 303(d) status. These segments are assessed as not supporting or partially supporting designated uses and might require additional controls to achieve designated uses. These segments make up the Georgia 303(d) list.
- NA Waters assessed as supporting designated uses.

Georgia will address a number of the listed waters in the 1999-2000 time period; however, the majority of work on segments in the Tallapoosa River will be addressed in the second round of basin planning. The second round of basin planning will begin in 2000, and the Coosa River will be the focus of monitoring in the year 2001. Significant efforts will be made to assess the condition of the listed 303(d) waters at that time, and results of the assessments will dictate the areas where TMDLs will be developed. TMDLs will be publicly noticed for appropriate segments in June 2003.

7.2.2 Management of Permitted Point Sources

The strategies in this section strive to minimize adverse effects from municipal, industrial, and concentrated storm water discharges. Permitted discharges of treated wastewater are managed through the National Pollutant Discharge Elimination System (NPDES) permit program. The NPDES permit program provides a basis for regulating municipal and industrial discharges, monitoring compliance with effluent limitations, and initiating appropriate enforcement action for violations. EPD has formulated general strategies for a number of types of environmental stressors under the NPDES program.

Analysis of Alternatives

Applicants for new or expanded point source discharges into any surface water must perform an alternative analysis comparing the proposed discharge alternative to a "no discharge," land application, or urban reuse alternative. The application for discharge to surface waters will be considered only if the less degrading alternatives are determined to be economically or technically infeasible. In all cases, existing instream water uses and the level of water quality necessary to protect the existing use must be maintained and protected.

Permit Issuance/Reissuance Strategies

During the basin plan implementation phase, issues identified in the written basin plan pertaining to point source discharges will be assessed. The assessment will include such things as (1) identified point source discharge problem areas, (2) data evaluations, (3) wasteload allocations and/or TMDLs with identified problem point sources, and (4) toxics identified with point source discharges. Permits associated with identified problems will be evaluated to determine whether a reopening of the permit is appropriate to adequately address the problem.

Watershed Assessment Requirements

A watershed assessment is typically initiated when, due to growth and development, a local government sees a need to increase the hydraulic capacity of an existing wastewater treatment facility (or propose a new facility) and contacts the EPD for and NPDES permit modification. If an antidegradation review demonstrates that it is not feasible to handle the additional capacity needs with a land treatment or other no discharge system, the community may pursue an increase in its surface water discharge. The initial step in this process is the completion of a watershed assessment, which is the first step toward ensuring that all water quality standards will be maintained throughout a watershed during both critical dry and wet weather conditions in response to both point and nonpoint source loads.

The watershed assessment is actually a study, an assessment, and a plan. It is about collecting data and learning relationships between what is going on in a watershed and how these activities (land uses, etc.) affect water quality, then using this knowledge to develop both short- and long-term plans designed to ensure the attainment of water quality standards. The assessment should address current conditions and consider projected land use changes. Only when it can be demonstrated that water quality standards are and will continue to be maintained can EPD develop a wasteload allocation and prepare a defensible permit for a proposed new wastewater treatment facility or proposed hydraulic expansion of an existing wastewater treatment facility discharging to the watershed. The assessment should include a detailed plan to address both current water quality and biological problems and any predicted future water quality and

biological problems. Key components of such a plan will likely be adopted by EPD as “special conditions” of the pertinent new or modified NPDES permit.

Facility Construction/Improvements

EPD has promoted continuing improvement in the quality of return flows from permitted point sources in the basin. Upgrading wastewater treatment facilities is a significant strategy to meet effluent limits from discharges. In the past 10 years, various upgrades and improvements have been made to industrial and municipal treatment systems throughout the Tallapoosa River basin. The funding for these projects has come from state and federal construction grants and the citizens of local municipalities. Appendix C provides detailed information on expenditures by city and county governments on upgrading wastewater treatment facilities in the basin.

Domestic Wastewater Systems

The collecting, treating and disposing of wastewater in Georgia is regulated by a number of environmental laws administered by various agencies in local and state government. When a local government or private concern (owner) identifies a need for a wastewater treatment and disposal system, it is imperative that thorough and adequate planning take place.

Wastewater systems that discharge treated wastewater to a surface stream must be permitted through the federal NPDES program and meet all the NPDES requirements. In Georgia, with very few exceptions, surface discharge permits will be issued only to publicly owned systems.

Wastewater systems that do not result in a discharge to surface waters, such as slow rate land treatment systems and urban reuse systems (no discharge), are permitted through the state of Georgia’s land application system (LAS) permitting process. Both publicly and privately owned systems can apply for and receive LAS permits.

Chlorine

If a chlorine limit is not already required in an NPDES permit, all major municipal wastewater facilities (i.e., those with design flows greater than or equal to 1.0 million gallons per day [MGD]) are required to meet a chronic toxicity-based chlorine limitation when the permit comes up for routine reissuance. The limitation is calculated based on a maximum instream concentration of 0.011 mg/L, the facility’s design flow, and the 7Q10 low flow of the receiving stream. No facilities are given a limitation higher than 0.5 mg/L since this is deemed to be an operationally achievable number even if a facility does not have dechlorination equipment installed. Facilities that are given a limitation more stringent than 0.5 mg/L and do not already have dechlorination equipment installed are given up to a 2-year schedule in which to meet the limitation. All discharging facilities that are upgrading are required to meet a chlorine limitation as part of the upgrade, based on the same criteria noted above.

Ammonia

Ammonia in effluents poses a problem both as a source of toxicity to aquatic life and as an oxygen-demanding waste. New facilities and facilities proposed for upgrade are required to meet ammonia limits for toxicity if those limits are more stringent than instream dissolved-oxygen-based limits. Existing facilities are not required to meet ammonia limits based on calculated toxicity unless instream toxicity has been identified through toxicity testing.

Metals/Priority Pollutants

Major municipal and industrial facilities are required to submit periodic priority pollutant scans to EPD as part of their permit monitoring requirements or upon submittal of a permit application for permit reissuance. The priority pollutant data are assessed in accordance with the Georgia Rules and Regulations for Water Quality Control. The results of the assessment can be used to trigger additional priority pollutant monitoring, a toxicity reduction evaluation, or permit limits for certain parameters.

Color

The state's narrative water quality standard for color requires that all waters must be free from material related to discharges that produce color which interferes with legitimate water uses. EPD's color strategy will address this standard for industrial and municipal discharges by implementing permit limits and/or color removal requirements. EPD requires new facilities or discharges to prevent any noticeable color effect on the receiving stream. EPD requires existing facilities with color in their effluent to collect upstream and downstream color samples when their NPDES permit is reissued. The facility must conduct an assessment of the sources of color. Also, a color removal evaluation may be required at permit reissuance. EPD will also target facilities for color removal requirements based on significant citizen complaints of discoloration in streams.

Phosphorus

EPD establishes phosphorus control strategies where needed to address water bodies where water quality is limited by excess phosphorus loading. Point source control of phosphorus typically involves stringent limits on phosphorus concentrations in municipal NPDES facility effluents. At this time, there are no major reservoirs in the Tallapoosa River basin with water quality standards for phosphorus.

Temperature

Permits issued for facilities that discharge to primary trout streams are required to have no elevation of natural stream temperatures. Permits issued for facilities that discharge to secondary trout streams are required to not elevate the receiving stream more than 2 degrees Fahrenheit.

Storm Water Permitting

The 1987 Amendments to the federal Clean Water Act require permits to be issued for certain types of storm water discharges, with primary focus on storm water runoff from industrial operations and large urban areas. EPA promulgated Storm Water Regulations on November 16, 1990. EPD subsequently received delegation from EPA in January 1991 to issue General Permits and regulate storm water in Georgia. EPD has developed and implemented a storm water strategy that ensures compliance with the federal regulations.

The "Phase I" federal regulations set specific application submittal requirements for large (population 250,000 or more) and medium (population 100,000 to 250,000) municipal separate storm sewer systems. Accordingly, Georgia has issued individual area wide NPDES municipal separate storm sewer system (MS4) permits to 58 cities and counties in municipal areas with populations greater than 100,000 persons. These permits authorize the municipalities to discharge storm water from the MS4s they own or operate and incorporate detailed storm water management programs. These programs may include such measures as structural and nonstructural controls, best management

practices, inspections, enforcement, and public education efforts. Storm water management ordinances, erosion and sediment control ordinances, development regulations and other local regulations, provide the necessary legal authority to implement the storm water management programs. Illicit discharge detection and long-term wet weather sampling plans are also included in the management programs. The permit requires the submission of Annual Reports to EPD, describing the implementation of the storm water management program. Among other things, the Annual Report includes a detailed description of the municipality's implementation of its Storm Water Management Plan.

EPA's Phase I Storm water Rule addresses only municipalities with populations of more than 100,000 people and construction sites larger than 5 acres. EPA is proposing a Phase II Storm water Rule for municipalities with populations of fewer than 100,000 people and construction sites smaller than five acres. This rule is not expected to be finalized until at least March 1999. The Phase II rule will eventually affect some of the municipalities within the basin.

EPD has issued one general permit regulating storm water discharges for 10 of 11 federally regulated industrial subcategories defined in the Phase I federal regulations. The 11th subcategory, construction activities, will be covered under a separate general permit, which is not yet finalized. The general permit for industrial activities requires the submission of a Notice of Intent (NOI) for coverage under the general permit, the preparation and implementation of a storm water pollution prevention plan, and, in some cases, the monitoring of storm water discharges from the facility. As with the municipal storm water permits, implementation of site-specific best management practices is the preferred method for controlling storm water runoff.

7.2.3 Nonpoint Source Management

The strategies in this section address sources of environmental stressors that are not subject to NPDES permitting and typically originate from diffuse or nonpoint sources associated with land uses. Most strategies that address nonpoint source concerns are not regulatory in nature, but involve a variety of approaches such as technical assistance and education to prevent and reduce nonpoint source pollution in the basin. Strong stakeholder involvement will be essential to effectively implement many of these strategies.

Georgia Nonpoint Source Management Program

EPD has produced the *Georgia Nonpoint Source Management Program (PFY98-02)*, which provides an overview of the state's nonpoint source water quality management activities, as well as a summary of what the State intends to accomplish in the next five federal fiscal years. The *Georgia Nonpoint Source Management Plan* addresses the following categories of nonpoint source pollution: Agriculture (crops, pasture, animal operations, aquaculture), Silviculture, Construction, Urban Runoff, Resource Extraction/Exploration/ Development, Land Disposal (Runoff/Leachate from Permitted Areas), Hydrologic/Habitat Modification, and Other.

Agricultural Nonpoint Source Control Strategies

Agricultural nonpoint source pollution continues to be managed and controlled with a statewide nonregulatory approach. This approach uses cooperative partnerships with various agencies and a variety of programs. Brief descriptions of these agencies and their functions and programs are provided below.

Soil and Water Conservation Districts

Georgia's SWCDs were formed by Act No. 339 of the Georgia General Assembly on March 26, 1937. Their role is to provide leadership in the protection, conservation, and improvement of Georgia's soil, water, and related resources. This is accomplished through promotion efforts related to the voluntary adoption of agricultural BMPs.

Currently there are 40 active SWCDs in Georgia. The entire Tallapoosa River basin in Georgia falls within the West Georgia Soil and Water Conservation District. At the county level, each SWCD receives technical assistance, through an existing Memorandum of Agreement, from the U.S. Department of Agriculture's Natural Resources Conservation Service to work with landowners on implementing agricultural BMPs. Through these partnerships applying a voluntary approach to conservation, 15 million acres have received conservation treatment in Georgia.

Georgia Soil and Water Conservation Commission (GSWCC)

Georgia's SWCDs receive no annual appropriations and are not regulatory or enforcement agencies. Therefore, the Georgia Soil and Water Conservation Commission (GSWCC) was also formed in 1937 to support the SWCDs. GSWCC has been designated as the administering or lead agency for agricultural nonpoint source pollution prevention in the state. The GSWCC develops nonpoint source water quality programs and conducts educational activities to promote conservation and protection of land and water resources devoted to agricultural uses. Primary functions of the GSWCC are to provide guidance and assistance to the Soil and Water Conservation Districts and to provide education and oversight for the Georgia Erosion and Sedimentation Act.

A number of other agricultural agencies administer programs to address water quality and natural resource management issues. Resource Conservation and Development (RC&D) Councils are organized groups of local citizens, supported by USDA, involved in a program to encourage economic development, as well as the wise conservation of natural and human resources. The University of Georgia College of Agricultural and Environmental Sciences (CAES) conducts an education and outreach campaign that encourages producers to increase productivity using environmentally sound techniques. This is accomplished through a number of programs like Farm*A*Syst, well water testing, nutrient management, soil and water laboratory analysis, and informational material on a wide range of subjects. The Georgia Department of Agriculture (GDA) administers a wide variety of insect and plant disease control programs to help regulate the use of pesticides. GDA also inspects irrigation system requirements, such as check valves and back flow prevention devices, for protection of ground water. The Agricultural Research Service (ARS) conducts research designed to improve the effectiveness of agricultural conservation techniques and promote sustainability. The Natural Resources Conservation Service (NRCS), along with the Farm Services Agency (FSA) and through local Soil and Water Conservation Districts, administers Farm Bill Programs that provide technical and financial incentives to producers to implement agricultural BMPs. The Agricultural Water Use Coordinating Committee, through its individual members, regularly applies for and receives funds under section 319(h) of the Clean Water Act to fund best management practices and demonstration projects throughout the state. The Georgia Soil and Water Conservation Commission has provided state leadership with many of these efforts.

Collectively, these programs will address resource concerns related to agricultural land uses in a coordinated fashion over the next 5 years until the second iteration of the River Basin Management Planning Cycle. Much of the information regarding opportunities to participate under this voluntary approach to complying with water quality standards is disseminated through commodity commissions and organizations such as the Farm Bureau Federation, Agribusiness Council, Cattlemen's Association, Milk Producers

Association, Pork Producers Association, Poultry Federation, and other agricultural support industries.

Prioritization Activities Under the Farm Bill

The 1996 Farm Bill provides a number of programs and processes designed to address those environmental stressors related to nonpoint sources from Agriculture which were identified in section 4.1.2. A new flagship conservation program, the Environmental Quality Incentives Program (EQIP), will provide the lion's share of funding for technical, educational, and financial assistance. The USDA's Natural Resources Conservation Service (NRCS) has leadership for EQIP and works with the USDA Farm Service Agency (FSA) to set policies, priorities, and guidelines. These two agencies take recommendations from local work groups and a State Technical Committee, composed of resource professionals from a variety of disciplines, when addressing actual and potential resource impairments associated with agricultural land uses.

EQIP provides incentive payments and cost-sharing for conservation practices through 5 to 10 year contracts. Producers may receive federal cost-sharing up to 75 percent of the average cost of certain conservation practices such as terraces, grassed waterways, filter strips, buffer strips, manure management facilities, animal waste utilization, and 46 other conservation practices important to improving and maintaining the health of natural resources in an area. An individual producer can receive as much a \$50,000 in EQIP funds to implement needed conservation practices.

A majority of funds allocated to Georgia (65 percent) will be spent in priority areas where there are serious and critical environmental needs and concerns. High priority is given to areas where state and local governments offer financial and technical assistance, and where agricultural improvements will help meet water quality and other environmental objectives. During the 1998 federal fiscal year, Georgia has 18 priority areas, none of which are located in the Tallapoosa River basin.

The remaining 35 percent of funds allocated to Georgia can be extended outside priority areas to other parts of the state. Eligibility is limited to persons who are engaged in agricultural productions. Eligible land includes cropland, pastureland, forestland, and other farm lands.

In addition to EQIP three major conservation programs from USDA will be available to producers and rural landowners. The first is the Conservation Reserve Program (CRP), which protects highly erodible and environmentally sensitive land with grass, trees, and other long-term cover. The Wetland Reserve Program (WRP) is a voluntary program designed to protect, restore, and enhance wetlands with cost-share incentives. The Wildlife Habitat Incentives Program (WHIP) will help landowners develop and improve habitats for upland wildlife, wetland wildlife, endangered species, fisheries, and other wildlife.

Forestry Nonpoint Source Control Strategies

In 1977, the Governor's Silviculture Task Force prepared a report that recommended a voluntary approach to the implementation of BMPs and the designation of the Georgia Forestry Commission (GFC) as the lead agency for implementing the silviculture portion of the state Section 208 Water Quality Management Plan. The GFC was designated as the lead agency for silvicultural nonpoint source pollution prevention in the state in November 1979. The Forestry Nonpoint Source Control Program is managed and implemented by the GFC, with the support of the forest industry, for the voluntary implementation of BMPs.

The Forestry Nonpoint Source Control Program is managed by a Statewide Coordinator and appointed foresters serving as District Coordinators from each of the 12 GFC districts. The Statewide and District Coordinators conduct educational workshops, training programs, and field demonstrations for the forest community (i.e., landowners, land management and procurement foresters, consulting foresters, timber buyers, loggers, and site preparation contractors). The GFC investigates and mediates complaints involving forestry operations. In addition, the GFC conducts BMP compliance surveys to assess the effectiveness of BMPs in the forest community. The GFC has established procedures for installing water control structures in firebreaks to reduce soil erosion and sedimentation.

Recently, the State Board of Registration for Foresters adopted procedures to sanction or revoke the licenses of professional foresters involved in unresolved complaints where the lack of BMP implementation has resulted in violations of state water quality or federal wetlands requirements.

Urban Nonpoint Source Control Strategies

The 1990 report of the Community Stream Management Task Force, *We All Live Downstream*, established a road map for urban nonpoint source management in Georgia. The Task Force recognized two major impediments to effectively managing the quality of urban waterbodies. The first is the division between statutory responsibilities for management of water quality, (granted to EPD) and local government's constitutional responsibility for management of the land activities that affect urban waterbodies. The second impediment is the widespread nature of the nonpoint sources and the variety of activities that can contribute to impacts from urban runoff. They concluded that management of urban nonpoint source pollution would require "... a cooperative partnership between layers of government, the private sector, and the general public. The development of such a partnership will require a strong impetus to accept new institutional roles and make the structural changes necessary to support and sustain the stream management process."

EPD has a primary role in facilitating the management of urban runoff, and it is responsible for administering and enforcing a variety of permit programs, including permitting of storm water discharges. In addition to these regulatory activities, EPD seeks to assist in development of local solutions to water quality problems; provides technical information on the water resources of the state; and administers grant programs, with funds from various sources, to support nonpoint source planning and assessment, implementation of BMPs, and regional or local watershed management initiatives. EPD also conducts a variety of outreach and educational activities addressing urban runoff in general, regulatory requirements, and cooperative or nonregulatory approaches.

For urban runoff, activities of the Nonpoint Source Management Program interact strongly with point source controls for combined sewers and storm sewers, both of which discharge urban runoff through point conveyances. While the state continues to have an important regulatory role, aspects of the cooperative intergovernmental partnerships envisioned by the Task Force have emerged and are being strengthened. EPD is implementing programs that go beyond traditional regulation, providing the regulated community with greater flexibility and responsibility for determining management practices. Current activities for urban surface runoff control include the following:

- Implementing local nonpoint source management programs, streambank and stream restoration activities, and community Adopt-A-Stream programs.
- Developing and disseminating local watershed planning and management procedures.

- Implementing state and local erosion and sedimentation control programs.
- Preparing and disseminating technical information on best management practices and nonpoint source monitoring and assessment.
- Implementing nonpoint source education programs for kindergarten through grade 12 through Project WET (Water Education for Teachers), as described below in Section 7.2.6.
- Implementing the Georgia Adopt-A-Stream Program, as described in Section 7.2.6.
- Identifying and evaluating resources to support urban watershed planning and management.

7.2.4 Floodplain Management

Floodplain Management Strategies

Floodplain Management in the state of Georgia is administered under federal regulations and local ordinances. The federal statutes are in Title 44 of the *Code of Federal Regulations*, Parts 59 to 79. As a condition of participation in the National Flood Insurance Program (NFIP), local political jurisdictions voluntarily adopt Flood Damage Prevention Ordinances, which are based on federal regulations, to enforce and administer floodplain development. Georgia's Floodplain Management Office does not issue permits for floodplain development.

Georgia's Floodplain Management Office, located within the Department of Natural Resources, Environmental Protection Division, serves as liaison between the Federal Emergency Management Agency (FEMA) and local communities participating in the NFIP. However, Georgia's Floodplain Management Office has no regulatory authority. Participation by the local communities in the NFIP is a requirement for the federal government to make flood insurance available to all property owners. Through workshops, newsletters, technical assistance and community visits, the Floodplain Management Office assists local governments in maintaining compliance with NFIP requirements. The Floodplain Management Office also provides technical data, floodplain maps, and training workshops to various public and private entities involved in floodplain management and floodplain determinations. In addition, the Floodplain Management Office reviews all state-funded and federally funded projects for development in designated Special Flood Hazard Areas. A major thrust of the Floodplain Management Office is to increase the number of political jurisdictions participating in the NFIP, thereby increasing the number of flood-insured structures in Georgia.

River Care 2000 Program

Georgia also has strategies to protect and manage riparian floodplain areas. Of particular relevance is River Care 2000, a conservation program that Governor Zell Miller established in September 1995. One key objective of this program is acquisition of river-corridor lands for purposes of protection and to forestall unwise development in flood-prone areas. The Coordinating Committee has approved procedures for three types of projects—Riverway Demonstration Projects, which improve public access to a river with scenic and recreation uses and protect natural and historic resources by acquiring and managing land in the river corridor; Significant Sites, the which are tracts of land the Department of Natural Resources (DNR) will acquire and operate as traditional state public-use facilities—such as wildlife management or public fishing areas, parks or historic sites, natural areas, and greenways; and Restoration Sites, which are tracts of land the state will identify, acquire, and manage to reduce nonpoint source water pollution.

The River Care 2000 program is also charged with assessing important river resources throughout the state and identifying more effective management tools for river corridors. The program recently released a statewide assessment of resources associated with rivers throughout the state (GA DNR, 1998).

7.2.5 Wetland Management Strategies

The loss of wetlands, because of the associated adverse impacts on flood control, water quality, aquatic wildlife habitat, rare and endangered species habitat, aesthetics, and recreational benefits, has become an issue of increasing concern to the general public as people become better informed of the values and functions of wetlands. Georgia still suffers from the lack of accurate assessments for current and historic wetland acreage, but, regardless of the method used to measure total acreage or wetland losses, Georgia still retains the highest percentage of precolonial wetland acreage of any southeastern state.

Efforts to Track No Net Loss of Wetlands

Although the 1993 Federal Administration Wetlands Plan calls for a concerted effort by EPA and other federal agencies to work cooperatively toward achieving no overall net loss of wetlands in the short term and a net increase in the quantity of the nation's wetlands in the long run, there have been no statutory or executive-level directives to carry out this policy. Achievement of the goal of no net loss is dependent on limited changes to regulations, memoranda of understanding, cooperative agreements, and other partnerships between federal, state, and local governments, conservation organizations, and private citizens.

All dredge and fill activities in freshwater wetlands are regulated in Georgia by the U.S. Army Corps of Engineers (USACE) under section 404 of the Clean Water Act. The majority of wetland alterations occur under nationwide or general permits, which include permits for bridge building, minor road crossing fills, and fills of less than 10 acres above the "headwaters" point of nontidal streams where the annual average flow is less than 5 cubic feet per second. Enforcement is carried out by the USACE and EPA in freshwater wetlands. Normal agricultural and silvicultural operations are exempted under section 404 regulations.

The USACE may require wetland mitigation activities in association with permitting, including creation, restoration, and protection of wetlands. The USACE may also require wetland restoration in the case of violations. In the settlement of violations, restorations occurred on 16.8 acres in 1994 and 17.8 acres in 1995.

Land Acquisition

DNR's, Wildlife Resources Division (WRD), began a land acquisition program in 1987 to acquire 60,000 acres of additional lands for Wildlife Management Areas (WMAs) and Public Fishing Areas (PFAs). This initiative was funded by \$30 million of 20-year obligation bonds to be paid off by hunting and fishing license increases and WMA permit fees.

In 1990 Governor Miller initiated Preservation 2000, a \$60 million program to acquire 100,000 acres of lands to be used for wildlife and fisheries management, parks and recreation, natural area preservation, and general conservation. Additional wetlands acquisition occurs as part of the River Care 2000 initiative, discussed above.

7.2.6 Stakeholder Involvement and Stewardship Strategies

Effective nonpoint source management must address the numerous activities of individuals, businesses, industries, and governments that can adversely affect urban and rural waters. In many cases, these groups are unaware of the potential impacts of their activities or corrective actions that could be taken. Stakeholder involvement and stewardship are essential to address these major challenges.

Georgia has chosen a two-pronged approach to encourage stewardship through education and citizen monitoring. EPD is the lead agency in these education and citizen monitoring programs, but, like other aspects of the state's nonpoint source management effort, cooperative efforts with local governments and community-based groups are critical to their implementation. Outreach and education, including citizen monitoring, lay the groundwork for behavioral change and are often important prerequisites for effective implementation of BMPs and comprehensive watershed management programs.

General goals for stakeholder involvement and stewardship strategies are as follows:

- Generate local support for nonpoint source management through public involvement and through monitoring of streams and other waterbodies and of results of management actions.
- Increase individuals' awareness of how they contribute to nonpoint source pollution problems and implement appropriate strategies to motivate behavioral change and actions to address those problems.
- Provide the educational tools, assistance, and support for addressing NPS problems to target audiences across the state.

Georgia Adopt-A-Stream

The Georgia Adopt-A-Stream Program is designed to promote citizen monitoring and stream protection. Currently, more than 5,000 volunteers participate in individual- and community-sponsored Adopt-A-Stream Programs. Volunteers conduct cleanups, stabilize streambanks, monitor streams using biological and chemical methods, and evaluate habitats and watersheds. These activities lead to a greater awareness of water quality and nonpoint source pollution, active cooperation between the public and local governments in protecting water resources, and the collection of basic water quality data. The Georgia Adopt-A-Stream Program focuses on what individuals and communities can do to protect Georgia's water resources from nonpoint source pollution. The program offers training and support in the following activities: watershed surveys, visual surveys, biological monitoring, chemical testing, and cleanups.

The Georgia Adopt-A-Stream Program addresses nonpoint source pollution from agriculture, silviculture, construction, and urban runoff. The focus of the Adopt-A-Stream Programs in middle and southern Georgia is often agricultural nonpoint source pollution (especially where land use is largely agricultural crop production). Examples of such pollution (e.g., excess fertilizer and animal waste) are presented in workshops, videos, and manuals. Adopt-A-Stream Programs in urban areas address nonpoint source pollution from construction and urban runoff. Workshops and training sessions emphasize the connection between land use, storm water runoff, and water resources. Erosion and sedimentation control at construction sites is always a major concern with volunteers.

Volunteers are offered three levels of involvement. Each level involves education and an action component on a local stream. Volunteers commit for a minimum of a year on a half-mile stream segment. Level I consists of setting up a project (i.e., identifying a

stream segment, identifying partners, registering with the Georgia Adopt-A-Stream Program), evaluating land use and stream conditions during a “watershed walk,” conducting quarterly visual evaluations and cleanups, and participating in one public outreach activity. Volunteers create a “Who to Call for Questions or Problems” list so that if something unusual is noted, immediate professional attention can be obtained. Level II builds on Level I by adding biological monitoring, chemical monitoring or a habitat improvement project. Level III includes two or more Level II activities.

Approximately 500 volunteers participate in the various workshops each year. “Introduction to Adopt-A-Stream Program” and “Watershed Walk” videos have been produced, duplicated, and distributed on loan. The Georgia Adopt-A-Stream Program Manuals have been printed and distributed to approximately 1,000 volunteers. In addition, a bimonthly newsletter is published and distributed to over 1,000 volunteers. The Annual Georgia Adopt-A-Stream Conference and Awards Ceremony is held each fall. The Georgia Adopt-A-Stream Program assists EPD in organizing the Annual Georgia River Clean-Up Week each fall, with more than 1,000 volunteers cleaning up river segments in over 50 locations. In addition, the Georgia Adopt-A-Stream Program conducts numerous presentations around the state.

As of January 1998, no Adopt-A-Stream organizations had been formed within the Tallapoosa River basin.

Nonpoint Source Education: Project WET (Water Education for Teachers)

A report outlining a plan for nonpoint source education in Georgia was completed in 1994. Titled Georgia Urban Waterbody Education Plan and Program, the report laid out nonpoint education strategies for seven target audiences—general public, environmental interest organizations, civic associations, educators, business associations, local government officials, and state government officials. Given limited resources and the scope of effort required to target each of these audiences concurrently, EPD decided to initially target nonpoint source education efforts toward educators and students in grades K to 12. To reach this target audience, EPD has focused on implementing Project WET, a water resources education curriculum that focuses on nonpoint source pollution. Covering impacts on ground water and surface water, the curriculum addresses the following nonpoint sources: agriculture, forestry, urban, and construction. It is recognized nationally and internationally and is readily adaptable to fit the state's Quality Core Curriculum requirements. To date, nonpoint source concerns have not received significant emphasis in water resources education efforts in Georgia. Implementation of Project WET is addressing this gap, providing educators and students with an understanding of the problems caused by nonpoint source pollution and the tools that can be used to prevent, control, or abate nonpoint source impacts.

EPD began implementing Project WET in December 1996. In 1997 Project WET Facilitator Training Workshops were successfully completed in Alpharetta, Macon, and Savannah, Georgia. Currently there are 86 Project WET Facilitators in Georgia.

In 1997, 32 Project WET Educator Workshops were successfully completed in Georgia statewide, with more than 500 educators receiving certified Project WET training and implementing the Project WET curriculum in classrooms. In addition to Project WET Facilitator Training and Educator Workshops, 40 Project WET Demonstration Workshops were presented to teachers and environmental educators throughout Georgia. A newsletter is published and distributed quarterly with program updates, workshop schedules, information about available resources, reports about classroom activities, and success stories. After 3 years, it is expected that a cooperating agency will assume responsibility for ongoing Project WET activities. At that time, the focus of the state's NPS education activities will be reevaluated and, depending on the focus of education

efforts undertaken by other entities, another of the audiences identified in the 1994 education plan might be targeted.

7.2.7 Ground Water Protection Strategies

In 1984, EPD developed its first management plan to guide the management and protection of Georgia's ground water quantity and quality. The current version, Georgia Geologic Survey Circular 11, published in 1996, is the basis of Georgia's application to be certified by USEPA for a Comprehensive State Ground Water Protection Plan (CSGWPP). The goal of Georgia's ground water management plan is

. . . to protect human health and environmental health by preventing and mitigating significant ground water pollution. To do this, Georgia will assess, protect, and, where practical, enhance the quality of ground waters to levels necessary for current and projected future uses for public health and significant ecological systems.

The goal recognizes that not all ground water is of the same value. The Division's goal is primarily preventive, rather than curative, but it recognizes that nearly all ground water in the state is usable for drinking water purposes and should remain so. EPD pursues this goal through a policy of antidegradation by which ground water resources are prevented from deteriorating significantly, preserving them for present and future generations. Selection of this goal means that aquifers are protected to varying degrees according to their value and vulnerability, as well as their existing quality, current use, and potential for future use.

EPD has adequate legal authority to prevent ground water from being significantly polluted and to cleanup ground water in the unlikely event pollution occurs. Extensive monitoring has shown that incidents of ground water pollution or contamination are uncommon in Georgia; no part of the population is known to be at risk.

In general, the prevention of ground water pollution includes (1) the proper siting, construction, and operation of environmental facilities and activities through a permitting system; (2) implementation of environmental planning criteria by incorporation into land use planning by local government; (3) implementation of a Wellhead Protection Program for municipal drinking water wells; (4) detection and mitigation of existing problems; (5) development of other protective standards, as appropriate, where permits are not required; and (6) education of the public to the consequences of ground water contamination and the need for ground water protection.

Ground water pollution is prevented in Georgia through various regulatory programs (administered by DNR) that regulate the proper siting, construction, and operation of the following:

- Public water supply wells, large irrigation wells and industrial wells withdrawing more than 100,000 gallons per day.
- Injection wells of all types.
- Oil and gas wells (including oil and gas production).
- Solid waste handling facilities.
- Hazardous waste treatment, storage, disposal facilities.
- Municipal and industrial land treatment facilities for waste and wastewater sludge.
- Municipal and industrial discharges to rivers and streams.

- Storage, concentration, or burial of radioactive wastes.
- Underground storage tanks.

EPD prevents the contamination of ground water used for municipal drinking water through an EPA-approved Wellhead Protection Program. As a result of this program, certain new potentially polluting facilities or operations are restricted from wellhead protection areas or are subject to higher standards of operation or construction. EPD also encourages local governments to adhere to the Criteria for the Protection of Groundwater Recharge Areas (a section of the Rules for Environmental Planning Criteria), which define higher standards for facility siting, operation, and cleanup in significant ground water recharge areas. The most stringent guidelines of these criteria pertain to those recharge areas with above-average ground water pollution susceptibility indexes.

Moreover, EPD has legal authority under the Georgia Water Quality Control Act to clean up ground water pollution incidents. Additional clean-up authority occurs as special trust funds established to clean up leaking underground storage tanks, abandoned hazardous waste sites, and scrap tire dumps.

Most laws providing for protection and management of ground water are administered by EPD. Laws regulating pesticides are administered by the Department of Agriculture; environmental planning, the Department of Community Affairs; and on-site sewage disposal, the Department of Human Resources. EPD has established formal Memoranda of Understanding with these agencies. The Georgia Groundwater Protection Coordinating Committee was established in 1992 to coordinate ground water management activities between the various departments of state government and the several branches of EPD.

7.3 Targeted Management Strategies

This section describes specific management strategies targeted to address the concerns and priority issues for the Tallapoosa River basin that were described in Section 6. Strategies are presented for each issue of concern with divisions by geographic area as appropriate. For each of the concerns identified, the management strategy statement consists of five components—a problem statement (identical to that given in Section 6), general goals, ongoing efforts, identified gaps and needs, and strategies for action. The purpose of these statements is to provide a starting point for key participants in the subbasin to work together and implement strategies to address each priority concern. In some cases, a strategy might simply consist of increased monitoring; in other situations, the stakeholders in the subbasin will need to develop innovative solutions to these water quality issues. Although EPD will continue to provide technical oversight, conduct monitoring surveys, and evaluate data on a basinwide scale, locally led efforts in the subbasins will be required to help to monitor, assess, restore, and maintain the water quality throughout the Tallapoosa River basin.

7.3.1 Metals

Problem Statement

The water use classification of fishing was not fully supported in one Tallapoosa River mainstem segment, and in 2 tributary stream segments due to exceedances of the water quality standards for metals. Lead standards were exceeded in the river due to nonpoint sources; lead, copper, cadmium, nickel, zinc and/or selenium were exceeded in Buffalo Creek and a tributary stream due primarily to an industrial site.

General Goals

Meet water quality standards to support designated water uses.

Ongoing Efforts

Historic discharges from Southwire Company, and associated contamination of stream sediments, are attributed as a cause of violations of standards in Buffalo Creek watershed. Early in 1997 Southwire initiated a watershed modeling effort for the Buffalo Creek watershed to help identify and quantify nonpoint source loadings in the watershed. During 1998 Southwire is collecting calibration data for the model to ensure it provides an accurate reflection of stream flow quantity and quality. The model will be an effective tool for evaluating potential nonpoint source management options and Best Management Practices to ensure the most effective options are implemented. This focused effort will help ensure that public and private resources are allocated to the most beneficial projects, and that proposed strategies contribute to the goal of providing a healthy environment for aquatic life.

In 1997 Southwire also began research on a Storm Water Capture and Control project for the Copper Division of Southwire (CDS) facility. The objective of the proposed project is to minimize the metals transported off the site by storm water. Currently, except for periods of extremely high rainfall, all storm water from the central 23 acre basin at the facility is captured, treated, and utilized as plant process water. Most manufacturing and materials handling operations occur in this central basin.

Under the proposed project, storm water from the central basin and from another 26 acres of the site would be captured, treated, and reused. Any discharged water would be treated to remove metals. Available technology will be pilot tested to determine the most feasible and effective water treatment technology. The initial cost for the proposed project is estimated to be \$15,000,000. If the research indicates this proposed project is feasible, implementation of the project will be a significant step towards improving water quality in streams leading from the site and overall aquatic health in the watershed.

Identified Gaps and Needs

The EPD is concerned with the accuracy of stream assessments showing criteria violations for metals because in many cases the metals database was minimal, with as little as one data point showing a concentration in excess of stream standards. Further, there are quality assurance concerns with much of the earlier metals data since it is now evident that clean and ultra clean techniques for sample collection and laboratory testing are necessary to produce data of ensured quality. Thus, the first step to address this issue will be to collect additional samples using clean techniques to determine whether water quality standards are actually being exceeded.

It is also unclear how occasional standards violations translate into actual risk to aquatic life. Georgia standards for metals might need to be reevaluated in light of recent EPA guidance on use of the dissolved fraction of total metal concentrations to calculate risk to aquatic life. Additional biological monitoring might be appropriate to measure impacts along with concentrations of metals.

For Buffalo Creek, it is unclear, at this point, how metals concentrations in excess of water quality standards translate into actual risk to or impairment of aquatic life. Initial tests on waters from Buffalo Creek indicate that stream water with metals concentrations in excess of metals standards does not cause toxic effects on sensitive aquatic organisms. Therefore, additional work is needed to determine the actual effect of metals concentrations on aquatic life in the Buffalo Creek watershed. In the past the State

University of West Georgia has collected aquatic life data for Buffalo Creek. An effort will be made to compile this data to look for trends and determine if impairment to aquatic life has in fact been observed.

The sources of metals contamination in the Buffalo Creek watershed are diverse and not yet fully identified. The ongoing watershed modeling effort undertaken by Southwire will assist in quantifying metals contributions from the various sub-basins so that additional sampling efforts can be focused in these areas. As sources are identified through sampling, potential management options for minimizing their impact on water quality will be evaluated using the model.

Strategies for Action

Addressing metals loading from nonpoint sources will be a complex task, requiring a strong local component and assistance from all stakeholders. An initial task in all impacted segments will be to conduct additional monitoring to determine whether water quality standards are actually being exceeded. For Buffalo Creek, a watershed modeling and nonpoint source management option evaluation process has been initiated by Southwire and will be developed as a tool to help identify opportunities to meet water quality goals.

Key Participants and Roles

- EPD will monitor and assess use support in listed waters, continue to enforce point source compliance with metal limits through the NPDES permitting program, and conduct additional monitoring to document metals concentrations in segments affected by nonpoint sources of metals.
- Southwire will develop and apply the watershed model for the Buffalo Creek basin, evaluate nonpoint source management options, and maintain NPDES discharge permit compliance.
- Local governments will develop and implement storm water management strategies.
- The State University of West Georgia will assist with biota studies and monitoring programs for Buffalo Creek.
- Other participants would be identified contingent on further analysis to confirm metal concentrations and on identification of potential sources.

Specific Management Objectives

Employ watershed modeling and additional data collection to determine effective approaches to maintaining a healthy environment for aquatic life. Overview ongoing efforts by Southwire to complete cleanup efforts.

Management Option Evaluation

EPD will take the lead in conducting additional monitoring to confirm that water quality standards are being exceeded. If violations are documented, EPD will develop a plan to assess sources and identify alternative solutions. For Buffalo Creek, watershed modeling will be utilized to identify and quantify nonpoint sources and to evaluate options.

Action Plan

- Southwire will continue to develop the Buffalo Creek watershed model and use the model to identify and quantify nonpoint sources and evaluate management options.
- Southwire will initiate work on the Storm Water Capture and Control project for the CDS facility.
- Southwire will continue to ensure that its permitted point sources remain in compliance with permitted effluent limitations for metals.
- EPD and Southwire will continue to sample in targeted areas to help pinpoint nonpoint sources of metal loading in the Buffalo Creek watershed. These efforts should be complete by December 2001, in accordance with the RBMP management cycle.
- EPD will propose a plan for resampling of streams identified as not supporting or partially supporting designated uses and complete sampling by December 2001, in accordance with the statewide RBMP management cycle.
- EPD will continue to administer the storm water regulations and will encourage local planning to address storm water management.
- EPD will continue to develop Rapid Bioassessment Protocol capabilities designed to assess impairment of aquatic life.
- Local governments may opt to develop a Storm Water Management Plan to address the urban runoff concerns.
- The basin team will reevaluate stream status and management strategies during the next basin cycle, scheduled for 2002.

Methods for Tracking Performance

Review of site cleanup progress and assessment of status of streams as new data are collected. An evaluation of the status of listed water bodies will be made coincident with the next iteration of the RBMP management cycle for the Tallapoosa basin in 2002.

7.3.2 Fecal Coliform Bacteria

Problem Statement

The water use classifications fishing or drinking water was not fully supported in one Tallapoosa River mainstem segment, one Little Tallapoosa River mainstem segment and 3 tributary stream segments due to exceedances of the water quality standard for fecal coliform bacteria. Four are attributed to urban nonpoint sources, representing a combination of urban runoff, septic systems, sanitary sewer overflows. One is attributed to rural nonpoint sources.

General Goals

Meet water quality standards to support designated water uses.

Ongoing Efforts

The primary source of exceedance of water quality standards for fecal coliform bacteria in the Tallapoosa River basin is urban nonpoint source runoff. Septic tanks and sanitary sewer overflows might also contribute to the problem.

Agriculture is making progress in controlling bacterial loads. Considerable effort has been directed toward animal confinement areas. Georgia universities and agricultural agencies or groups are conducting several agricultural efforts with statewide implementation. Sustainable Agriculture and Farm*A*Syst. Training will be scheduled in the near future within the basin. The UGA and ARS have submitted proposals for assessing nutrient- and coliform-reducing BMPs on 10 farms, which will have statewide implications. Soil and Water Conservation Districts annually convene Local Work Groups, composed of resource professionals from a variety of disciplines and interested stakeholders at the local level, to identify resource concerns in their areas. These Local Work Groups develop proposals for USDA or other funding to address identified resource concerns.

NRCS, in cooperation with other agencies, is working with local landowners to implement agricultural best management practices with cost-sharing funds under PL-566. The project is referred to locally as the Lower Little Tallapoosa River Watershed Project. There have been local efforts to expand this project to include the entire Little Tallapoosa River Watershed.

The ongoing Lower Little Tallapoosa River Watershed Project is addressing agricultural animal waste as is the Section 319 Special BMP Demonstration Project in Carroll County. In addition, EPA and NRCS, in cooperation with the agricultural community in Georgia, are conducting field inventories to verify agricultural contributions to water quality impairments on streams for which a TMDL has been established.

Identified Gaps and Needs

Sources of fecal coliform bacteria in many stream segments are not clearly defined. In some cases, fecal bacterial loads might be attributable to natural sources (e.g., wildlife); alternative bacteriological sampling methods might be useful to distinguish between human, other mammalian, and avian fecal coliform sources. Sanitary sewer leaks and overflows could be a source of fecal coliform. In addition, previous sampling was not conducted at a sufficient frequency to determine whether the monthly geometric mean criterion specified in the standard has actually been violated. Thus, an initial effort in the next RBMP cycle might be to collect an adequate number of samples (four over a 30-day period) to support geometric mean calculations to determine whether water quality standards are actually being exceeded.

Many coliform-reducing practices are expensive, and the percentage of reduction is often unknown. Many landowners are reluctant to spend today's dollars for long-term amortization in uncertain futures markets. Agricultural BMPs and cost-share dollars (Farm Bill and section 319 funds) and loans need to be concentrated in priority watersheds with a sufficient technical workforce to implement enough BMPs through long-term agreements or contracts to reduce sediment loading by 70 to 80 percent.

Strategies for Action

Separate strategies are needed to address nonpoint fecal coliform bacteria loadings from urban and rural sources.

A. Strategies for Urban Sources

Addressing urban runoff will be a complex task and will require implementation of watershed pollution control programs by local governments. Management of urban runoff is needed to address a variety of water quality problems, including metals, fecal coliform bacteria, nutrients, and habitat degradation. For this 5 year phase of the basin management cycle, management will concentrate on source control and planning. The efficacy of this approach will be evaluated during the basin strategy reevaluation scheduled for October 2001 to September 2002, in accordance with the statewide RBMP management cycle.

Key Participants and Roles

- EPD will monitor and assess use support in listed stream segments and will encourage local efforts to address nonpoint source pollution.
- Local governments will continue to operate and maintain their sewer systems and wastewater treatment plants; monitor land application systems; and develop and implement storm water regulations, zoning and land use planning, local watershed initiatives, and monitoring programs.
- Local municipalities should work with local health departments to identify locations of septic systems and educate owners about the proper care and maintenance of septic systems.
- Citizen groups will implement Adopt-A-Stream programs and work with local governments in implementing watershed initiatives.

Specific Management Objectives

Facilitate local watershed planning and management to ensure that designated water uses are supported.

Management Option Evaluation

Integrated management options will be proposed, implemented, and evaluated by local governments.

Action Plan

- EPD will continue to ensure that all permitted point sources remain in compliance with permitted effluent limitations for fecal coliform bacteria. EPD will also request a comprehensive watershed assessment, looking at both point and nonpoint sources, from localities applying for new or expanded NPDES point source discharge permits. The intent is to direct localities' attention to current and future nonpoint source issues in their watershed and to have them consider ways to prevent or control water quality impacts due to growth. Approved watershed management steps will be included as a condition for expansion of existing water pollution control plants or construction of new plants.
- EPD will continue to administer the storm water program and encourage local planning to address storm water management.
- EPD will encourage local authorities to institute programs to identify and address illicit sewage discharges, leaks and overflows of sanitary sewers, and failing septic tanks within their jurisdictions.

- EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of urban streams.
- EPD will complete reassessment of fecal coliform bacteria monitoring protocols and will propose a plan for resampling of streams identified as not supporting or partially supporting designated uses. Sampling will be completed by December 2001, in accordance with the statewide RBMP management cycle.

Method for Tracking Performance

EPD tracks point source discharges through inspections and evaluations of self-monitoring data. The status of listed waterbodies will be evaluated coincident with the next iteration of the RBMP management cycle for the Tallapoosa River basin in 2002.

B. Strategies for Rural Sources

Agricultural cost-share dollars (Farm Bill and section 319 funds) and loans need to be concentrated in priority watersheds with sufficient technical workforce to implement enough BMPs through long-term agreements or contracts.

Key Participants and Roles

- EPD will monitor and assess use support in listed streams, encourage local planning efforts, and regulate point sources under the NPDES program.
- GSWCC and local SWCDs and RC&D Councils, with assistance from NRCS, will promote implementation of agricultural management practices. Local SWCDs will convene Local Work Groups to identify local resource concerns and develop proposals for funding to address these concerns.
- Citizen groups will implement Adopt-A-Stream programs and will work with local governments in implementing watershed initiatives.
- Local municipalities should work with local health departments to identify locations of septic systems and educate owners about proper care and maintenance of septic systems.

Specific Management Objectives

Encourage and facilitate local watershed planning and management to ensure that designated water uses are supported.

Management Option Evaluation

Evaluation will be consulted on a site-by-site basis. For agricultural BMP support, existing prioritization methods of the agricultural agencies will be used.

Action Plan

- EPD will continue to ensure that all permitted point source discharges remain in compliance with fecal coliform bacteria limits.
- EPD will continue monitoring and assessment of Land Application Systems.
- GSWCC and local agricultural agencies will continue to support adoption of BMPs for animal waste handling and will follow up on complaints related to coliform bacteria derived from agriculture. Methods for prioritization and implementation of cost-share incentives under the 1996 Farm Bill will be

targeted to areas of apparent water quality impact, including rural streams, which may sustain excessive fecal coliform loads from animal and cropland operations.

- DHR is in the process of developing new regulations for septic systems. DHR will work to educate local governments and citizen groups about the need for adequate regulation and maintenance of septic systems to protect water quality. DHR will also use the criteria presented in the Growth Planning Act for septic system setbacks from high-value waters.

Method for Tracking Performance

Agricultural agencies will track rates of BMP implementation for cropland and animal operations. The status of listed waterbodies will be evaluated coincident with the next iteration of the RBMP management cycle for the Tallapoosa River basin in 2002.

7.3.3 Erosion and Sedimentation

Problem Statement

Water use classifications for fishing or drinking water are potentially threatened in many waterbody segments by erosion and loading of sediment, which can alter stream morphology, affect habitat, and reduce water clarity. Potential sources include urban runoff and development (particularly construction), unpaved rural roads, stream erosion (including headcutting, bank erosion, and shifting of the bedload), forestry practices, and agriculture. At the present time there are no stream segments listed in this basin as not fully supporting designated uses due to poor fish communities or sedimentation; however, threats from sediment load are possible throughout the Tallapoosa River basin. A common strategy is proposed for addressing erosion and sedimentation throughout the basin; however, achieving standards in individual stream segments will depend on the development of site-specific local management plans.

General Goals

Control erosion and sedimentation from land-disturbing activities to meet narrative turbidity water quality standards and support designated uses.

Ongoing Efforts

Forestry and agriculture have voluntary erosion and sediment control (E&SC) programs built around implementation of BMPs. Both forestry and agriculture have a water quality complaint resolution procedure in place. GSWCC recently updated and is distributing *Manual for Erosion and Sediment Control in Georgia* and the *Field Manual for Erosion and Sediment Control in Georgia*. The GSWCC and its agricultural partners have produced and distributed three E&SC pamphlets— *Guidelines for Streambank Restoration*, *A Guide to Controlling Erosion with Vegetation*, and *Agricultural Best Management Practices*. These and numerous other E&SC-related pamphlets and other informational materials are available in agricultural offices throughout the state. Soil and Water Conservation Districts annually convene Local Work Groups (LWGs), composed of resource professionals from a variety of disciplines and interested stakeholders at the local level, to identify resource concerns in their area. These LWGs develop proposals for USDA or other funding to address identified resource concerns.

GSWCC estimates that there are 95,000 agricultural acres within the Basin and that 10,200 of those acres are eroding above the soil loss tolerance.

NRCS, in cooperation with other agencies, is working with local landowners to implement agricultural best management practices with cost-sharing funds under PL-566. The project is referred to locally as the Lower Little Tallapoosa River Watershed Project. There have been local efforts to expand this project to include the entire Little Tallapoosa River Watershed. Also the West Georgia Soil and Water Conservation District chairs the Georgia Association of Conservation Districts Water Resources Committee and has a special interest in the Tallapoosa basin.

Forestry has made significant E&SC progress. GFC has been and is specifically targeting those landowner groups and regions with low compliance for increased BMP education through local talks, workshops, and demonstrations, including the Master Timber Harvesters Workshop sponsored by the Georgia Forestry Association's and the American Forest and Paper Association. The workshop's goal is to train every logger in the state on BMPs. In addition, the Georgia State Board of Registration for Foresters requires every licensed forester to implement BMPs as a minimum standard of practice. The new Forestry BMPs, scheduled for printing in June 1998, will result in additional sedimentation reductions and leave more riparian tree cover over perennial and intermittent streams when they become standard within the industry.

GFC conducted statewide BMP Compliance Surveys in 1991 and again in 1992 and is in the process of conducting one in 1998. During the 1992 survey, the GFC evaluated 250 acres in the Tallapoosa Basin and determined that, of the activities, 44 percent of the roads and 81 percent of the harvested acres were in compliance with BMPs. No site prepared acres or regenerated acres were evaluated.

EPD serves as an "Issuing Authority" in those localities across the state that do not have a local E & SC ordinance or program. EPD provides permitting, inspection, compliance, and enforcement services in these areas.

There are several urban-focused erosion educational initiatives are under way. Each year GSWCC and EPD conduct five formal E&SC courses to provide training to the regulated community, regulators, consultants, and interested citizens. GSWCC also provides detailed E&SC training to from 8 to 11 units of government each year. A task force established by the Lieutenant Governor, the Erosion and Sediment Control Technical Study Committee, also known as DIRT II, is assessing the economic and environmental impacts of erosion prevention and sediment control BMPs for urban construction sites. Another urban initiative is the U.S. Forest Service's Planting Along Stream Sides (PASS) which deals with vegetative plantings to reduce erosion from streambanks.

Identified Gaps and Needs

Adverse impacts of excess sediment loading include degradation of habitat and reduction in species diversity. These types of impacts are best addressed through biological monitoring, for which improved capabilities are needed. EPD is developing increased capability for biomonitoring using Rapid Bioassessment Protocols (RBPs) for benthic macroinvertebrates. The EPD protocols include habitat assessment. The WRD is working with the Integrated Biotic Index (IBI) to assess fish communities. These tools will provide methods to detect and quantify impairment of aquatic life resulting from habitat-modifying stressors such as sediment, as well as impacts from other stressors.

A key for addressing erosion, sedimentation, and habitat issues on highly impacted streams is definition of appropriate management goals. Many such streams cannot be returned to "natural" conditions. An appropriate restoration goal needs to be established through consultation among EPD, partners, and other stakeholders.

Many privately owned sawmills are not members of the American Forest and Paper Association, and there is no good way of requiring these mills and their producers to come to the Master Timber Harvesters Workshops. The GFC, UGA, GFA, and Southeastern Wood Producers Association are working on a solution. Education of private landowners who are selling timber for the last time prior to land development is still needed. Many such landowners attempt to maximize return on timber, sometimes at the expense of BMPs.

Much of the sediment being produced and adversely affecting streams and lakes is associated with road development and maintenance. In many instances, the E&SC plans, implementation, inspection, and enforcement are not adequate on Department of Transportation- and county-sponsored road projects. Without aggressive inspection and enforcement contractors sometimes tend to let erosion problems happen and attempt to mitigate after the fact. Georgia DOT and other agencies charged with E&SC need to work with county road departments in identifying road segments that are high sediment producers and recommend abatement measures. Further monitoring might be needed to quantify the impact of unpaved rural roads as a source of sedimentation into streams.

Strategies for Action

Understanding of the role of erosion and sedimentation in urban streams is incomplete at this time. Most of these streams are affected by a variety of stressors. An incremental or phased approach is needed to address these issues.

Most agricultural sediment reduction practices are expensive and landowners are reluctant to spend today's dollars for long term BMP amortization in uncertain future markets. Agricultural cost-share dollars (Farm Bill) and perhaps low-interest loans (Clean Water Act State Revolving Fund) need to be concentrated in priority watersheds with sufficient technical workforce to implement enough BMPs through long-term agreements or contracts to reduce sediment loading.

Key Participants and Roles

- EPD will encourage local government water quality improvement efforts and continue the development of biomonitoring methods.
- Local governments will enforce erosion controls for construction practices and implement land use planning.
- GSSWC and local SWCDs and RC&D Councils, with assistance from NRCS, will encourage the implementation of BMPs to control erosion of agricultural lands.
- GFC will encourage compliance with forestry BMP guidelines.
- Citizen groups will implement Adopt-A-Stream programs and work with local governments in implementing watershed initiatives.

Specific Management Objectives

Control erosion and sedimentation from land-disturbing activities to meet water quality standards.

Management Option Evaluation

During this iteration of the basin cycle, management will focus on source control BMPs.

Action Plan

- GSSWC and local SWCDs and RC&D Councils, with assistance from NRCS, will encourage the implementation of BMPs to control erosion of agricultural lands. Local SWCDs will convene Local Work Groups to identify local resource concerns and develop proposals for funding to address these concerns.
- GFC will target landowner and user groups for BMP education to encourage compliance with forestry BMP guidelines.
- EPD will work with local governments with issuing authority for erosion and sedimentation controls first through education and second through enforcement to control erosion at construction site and will encourage local governments to implement land use planning.
- EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of urban streams.
- EPD and WRD will continue to develop biological monitoring capabilities designed to assess aquatic life.

Method for Tracking Performance

GSWCC, GFC, EPD, and issuing authorities will track BMP implementation—GSWCC by the number of E&SC plans reviewed and DAT evaluations and recommendations, GFC through its biannual surveys, and EPD through routine inspections of permitted projects and through surveillance for any noncompliance and the conduct of necessary compliance and enforcement activities. NRCS will track BMP implementation through its NIMS reporting system.

7.3.4 Nutrients

Excess nutrient loads are a concern for all surface waters since they promote undesirable growths of floating and attached algae that can degrade habitat, deplete dissolved oxygen, and result in filter clogging and taste and odor problems for public water supply systems. Impacts are typically greatest in lakes and reservoirs; however, nutrients can also stimulate undesirable growths of attached algae in smaller rivers and streams. For this iteration of the Tallapoosa River basin plan, nutrients have not been identified as a significant issue within the Georgia portion of the basin; however, nutrients may be an issue within Harris Reservoir in Alabama, which receives drainage from the Georgia portion of the basin.

Problem Statement

The water use classifications of fishing and recreation are potentially threatened in Harris Reservoir due to inputs of nutrients that might cause excess algal growth in the lake. Nutrient sources include water pollution control plant discharges and nonpoint sources from urban and agricultural areas.

General Goals

Meet water quality standards and maintain nutrient loading at levels sufficient to support designated uses within Harris Reservoir.

Ongoing Efforts

NRCS, in cooperation with other agencies, is working with local landowners to implement agricultural best management practices with cost-sharing funds under PL-566. The project is referred to locally as the Lower Little Tallapoosa River Watershed Project. There have been local efforts to expand this project to include the entire Little Tallapoosa River Watershed.

The Lower Little Tallapoosa River Watershed Project is addressing agricultural animal waste as is the Section 319 Special BMP Demonstration Project in Carroll County. Soil and Water Conservation Districts annually convene Local Work Groups (LWGs) which are comprised of resource professionals from a variety of disciplines and interested stakeholders at the local level, to identify resource concerns in their area. These LWGs develop proposals for USDA or other funding to address identified resource concerns.

Identified Gaps and Needs

The Clean Lake Study will provide information on nutrient concentrations and sources.

Strategies

Additional point and nonpoint source controls such as agricultural best management practices may be implemented in the Tallapoosa basin upstream of Harris Reservoir to minimize nutrient inputs into the lake and comply with future water quality standards.

7.3.5 Protection of Threatened and Endangered Species

Problem Statement

The Tallapoosa basin is home to a number of aquatic species that have been listed as threatened or endangered and require protection.

General Goals

To provide aquatic habitat and management to support the survival and propagation of threatened and endangered species; to meet or exceed state and federal laws, rules, and regulations for the protection of endangered species; and to incorporate planning for protection of threatened and endangered species into all aspects of basin planning.

Ongoing Efforts

Information on ongoing efforts to protect threatened and endangered species in the Tallapoosa River basin was not available at the time of the preparation of this draft plan.

7.3.6 Water Quantity Demand

Problem Statement

Sufficient water quantity to meet the competing demands for drinking water, minimum instream flow rate, and recreation uses might not be available within the Tallapoosa River basin (HUC 03150108). In addition, the state of Alabama is concerned about the potential effects of reservoir construction and growth of water use in west Georgia on downstream water flow and availability.

General Goals

Provide adequate water supplies to meet Georgia's needs for future water withdrawals and for assimilation of wastewater discharges.

Ongoing Efforts

In response to the 1986-1988 drought period and to the need for regional water supply options, the 1989 General Assembly passed the Water Supply Act, effective April 18, 1989. The Act authorizes the Department of Natural Resources (DNR) to initiate projects to provide adequate water for the State's future, to supplement current community needs in the event of prolonged drought, and promote the use of projects for the public good and general welfare. The Act authorizes DNR to acquire lands for water supply projects, compensate for any environmental alterations, and to manage the projects. Capital and operating costs would be recouped through user fees paid by local governments contracting with DNR for the water.

The DNR pursued the first regional reservoir site to satisfy 2050 water demand in the counties of Polk, Haralson, Carroll, Douglas, and Paulding. The intent was to build a reservoir that would maximize water supply for the surrounding area while minimizing the need for many smaller projects. DNR chose a site on the Tallapoosa River about 5 miles from the Alabama border. Alabama opposed the project and with the initiation of the ACT/ACF Comprehensive Study, this proposed regional reservoir was put on hold.

Water quantity needs and allocations throughout the entire basin are being addressed through the ACT/ACF Study. The ACT Compact has been approved, and Compact Commission meetings began in February of 1998. The Commission is charged with the responsibility of developing an allocation formula for the basin by December 31, 1998, which will be acceptable to the states of Alabama and Georgia, as well as the federal government. Projections of future water needs indicate that not all demands can be met under historic conditions of water shortages without construction of a reservoir.

While the ACT/ACF Study was underway, DNR undertook a water supply study to develop a number of water supply alternatives for this region. This water supply study was done in cooperation with the West Georgia Regional Water Authority Board (WGRWA), comprised of representatives from the five counties, and a Technical Advisory Group, consisting of representatives from stakeholders in the region. Ultimately, the WGRWA chose to go with the original Regional Reservoir site near the Alabama-Georgia state line and have the WGRWA apply for any permits necessary to build the reservoir. The WGRWA has agreed to postpone the permit application process until the three states have agreed on a water allocation formula for the ACT/ACF or until 12/31/98, whichever comes first.

Aquatic habitat can be adversely affected by unnatural variations in lake levels and river flow. One significant issue which is receiving increasing attention is that of the minimum stream flow rate which must be maintained below reservoirs and river water withdrawals. In September of 1996, the Directors of EPD and the Wildlife Resources Division (WRD) empaneled a multi-disciplinary group of stakeholders to review EPD's existing minimum stream flow policy of protecting the lowest seven-day average flow which occurs with a frequency of one in a ten-year period (7Q10 flow). In November of 1997 this group submitted a set of recommendations, which concluded that there was sufficient cause to modify the current policy to better protect stream biological diversity and aquatic habitats, but that there was not a sufficient number of site-specific studies in Georgia on which to base a definitive long-term modification to the current policy. The groups recommended that interim modifications to the current policy be employed until

such time as sufficient data are available to establish a scientifically defensible long-term policy.

Identified Gaps and Needs

The models and databases that have been under development for the Comprehensive Study since 1991 must be completed and approved prior to development of an allocation formula. Negotiations will take place during 1998 to reach an agreement on water allocation out to the year 2050.

Additional data are required to establish a scientifically defensible long-term policy for minimum instream flows.

Strategies for Action

Water quantity will be managed in the context of the ACT/ACF allocation process, which is expected to address such issues as reservoir operation and storage volume reallocation, as well as defining the portion of Tallapoosa basin flows that will be available for Georgia's use. If successful, the allocation is expected to be effective by the latter half of 1999. Georgia will be responsible for delivery of certain flows to Alabama under specified conditions, but neither the Compact nor the Commission will interfere with Georgia's internal decision-making process or affect allocations of water within Georgia. Georgia will not agree to an allocation for the ACT basin that falls significantly short of its expected needs in a drought, though there might be less-than-optimal quantities of water for some uses in times of shortage.

Key Participants and Roles

- The ACT Compact Commission is responsible for developing the water allocation formula. The Commission consists of two voting members, who are the governors of the states of Georgia and Alabama, and one nonvoting Federal Commissioner, who has not yet been appointed by the President. In addition, each Commissioner has the right to appoint alternate Commissioners to act in his or her place when unable to attend.
- The states of Georgia and Alabama are parties to the ACT allocation process.
- The U.S. Army Corps of Engineers has the primary operational control of flow of water within the basin.
- Stakeholders representing the various public, private, and business interests in water use and conservation within the states of Alabama and Georgia are actively involved in providing input to the states and federal government about the best ways to manage water resources in the ACT basin.
- The federal government, with the Corps of Engineers as lead agency, is preparing an Environmental Impact Statement to evaluate the impacts of the chosen allocation formula and management procedures.
- The West Georgia Regional Water Authority is prepared to submit a Section 404 permit application to the Corps of Engineers for the West Georgia Regional Reservoir on the Tallapoosa River in Haralson County. The application may be delayed until the states have agreed upon a proposed water allocation formula for the ACT basin, that is until 1999. Once submitted, however, that application will initiate the formal environmental impact statement (EIS) process to meet the Corps of Engineers requirements for compliance with the National Environmental Policy Act (NEPA).

- EPD and WRD are responsible for establishing minimum instream flow requirements below permitted withdrawals.

Specific Management Objectives

Develop an allocation of water resources in the ACT basin, including the Tallapoosa River basin, which will satisfy the projected needs of Alabama and Georgia, as well as the federal government, through the year 2050.

Management Option Evaluation

A formal evaluation of management options will take place as part of the ACT basin allocation process. Planning for the Tallapoosa River basin must be consistent with the ACT allocation. However, detailed Tallapoosa basin management activities will not be determined by the interstate agreement since local control of water resource decisions will be retained.

Action Plan

- Complete ACT allocation formula by December 31, 1998.
- Federal concurrence (or nonconcurrence) within 255 days of the allocation formula.
- Following concurrence with the formula, EPD will work with county and municipal governments and with other stakeholders to develop an action plan that is consistent with the formula.
- EPD and WRD will develop a final long-term policy for minimum instream flow requirements.

Method for Tracking Performance

To be determined.

7.3.7 Source Water Protection for Drinking Water Sources

Problem Statement

Many public water supplies have no control over their source watersheds and have to spend additional treatment dollars to ensure a high-quality water supply. All streams with municipal water intakes need to have watershed assessments and protection plans developed and implemented.

General Goals

EPD will establish proactive planning and management to maintain the safety and high quality of drinking water sources on all streams with municipal water intakes by having watershed assessments and protection plans developed and implemented. All streams and existing lakes under serious consideration for use as public water supplies will have a source water assessment made early in the planning process.

Ongoing Efforts

Georgia EPD is developing a source water assessment program (SWAP) in alignment with EPA's initiatives. EPD is working with USGS on some program elements and is beginning to work with some water authorities in starting the process. Some water

authorities and local governments have adopted source water protection measures in conjunction with Growth Strategies Initiatives.

Identified Gaps and Needs

This is a new and more comprehensive initiative, and neither EPD nor many local authorities have much experience in performing the assessments and developing the protection plans. The Implementation Plan is still under development by EPD.

There are complexities in developing an assessment that would be general to all watersheds because of the varying land uses. Therefore, EPD has the task of deriving a number of approaches that can be applied to a watershed depending on the development and land uses within it. EPD must derive these approaches with the assistance of advisory committees and the public prior to submitting the SWAP Implementation Plan to EPD.

EPD must also find effective measures to promote and encourage local communities to adopt source water protection programs using the assessment results.

Strategies for Action

EPD will develop a SWAP Implementation Plan and submit it to the USEPA by February 6, 1999. EPD will describe in the SWAP Implementation Plan methods and approaches for (1) delineating the source water protection areas for all public water supply sources within the state (the outer management zone for ground water sources); (2) inventorying potential contaminants within the delineated protection zone; (3) determining water supply susceptibility to significant potential contaminants within the protection zone; and (4) involving the public in developing SWAPs and making assessments available to the public.

Key Participants and Roles

EPD; local governments; water authorities; federal, state, and local agencies; and special interest groups.

Specific Management Objectives

EPD is actively working toward the following national goal: By the year 2005, 60 percent of the population served by community water systems will receive their water from systems with source water protection programs (SWPP) in place under both wellhead protection and watershed protection programs. EPD intends to accomplish this goal by developing and implementing a source water assessment program (SWAP) in alignment with EPA's initiatives.

Management Option Evaluation

Formulation will be on a site-by-site basis and will be updated with each planning cycle in the basin.

Action Plan

- EPD will submit a SWAP Implementation Plan to USEPA by February 6, 1999.
- Identify water intakes and authorities.
- Delineate watersheds contributing to intakes.

- Establish criteria and guidelines for assessments and protection plans.
- Provide support to water authorities and local governments.
- Review and approve source water protection plans.

Methods for Tracking Performance

To be determined.