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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 Ogeechee River basin.

Georgia’s Mission Statement for 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 which emphasize coordinated planning necessary to meet all applicable local, state, and federal laws, rules, and regulations, and provide for water quality, habitat, and recreation. For the Ogeechee 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. Section 7.1 describes the big-picture management goals for the Ogeechee River basin. Section 7.2 describes the general and basinwide implementation strategies most relevant to the Ogeechee River. Targeted strategies for specific priority concerns within each subbasin, as identified in Section 6, are then presented in 7.3.

7.1 “Big Picture” Overview for the Ogeechee River Basin

This Ogeechee River Basin Management Plan includes strategies to address a number of different basinwide objectives. These include:

- Protecting water quality in lakes, rivers, streams, estuaries, and coastal waters 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; minimization of risk from contaminated fish tissue, and reduction of risks from flooding; and
- 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 Ogeechee 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 Ogeechee River basin.

7.1.1 Water Quality Overview

As discussed in Section 5, water quality in the Ogeechee 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 little oxygen and impaired aquatic life. For the most part, local government and industrial wastewaters are properly treated, oxygen levels have returned, and fish have followed.

The primary source of pollution that continues to affect waters of the Ogeechee River basin results from nonpoint sources. Key types of nonpoint source pollution impairing or potentially threatening water quality in the Ogeechee River basin include erosion and sedimentation, bacteria from urban and rural nonpoint sources, metals from urban and rural sources, excess nutrient loads to reservoirs, and increases in water temperature resulting from loss of riparian canopy and increased paved surface areas. These problems result from the cumulative effect of activities of many individual landowners or managers. Population is growing every year, increasing the potential risks from nonpoint

source pollution. Growth is essential to the economic health of the Ogeechee 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 Ogeechee River basin.

Key Actions by EPD

The Georgia EPD Water Protection Branch has responsibility for establishing water quality standards, monitoring water quality, river basin planning, water quality modeling, permitting and enforcement of point source NPDES permits, and developing 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 Ogeechee 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 (TMDLs).** Where water quality sampling has documented standards violations and ongoing actions are not sufficient to achieve water quality standards in a two 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 non-regulatory tools. TMDL's established under the Clean Water Act for stream segments within this basin are included in this River Basin Plan and are incorporated by reference herein. Those stream segments are identified with a "3" in the 303(d) column of the table in Appendix E of this plan. The TMDL's for this river basin are too voluminous to be attached to this plan, but copies of any of the TMDLs adopted by reference may be obtained from EPD by sending a request to the address in the Preface.

- **Source Water Protection.** The public water supply in the Ogeechee basin is drawn from surface and groundwater. 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 sub-section 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.
- **Fish Consumption Guidelines.** EPD and the Wildlife Resources Division work to protect public human health by testing fish tissue and issuing fish consumption guidelines as needed, indicating the recommended rates of consumption of fish from specific waters. The guidelines are based on conservative assumptions and provide the public with factual information for use in making rational decisions regarding fish consumption.

Key Actions by Resource Management Agencies

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

Agriculture in the Ogeechee River basin is primarily restricted to livestock and poultry operations. 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 Ogeechee basin. 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 resource 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.

In sum, it is the responsibility of local governments to implement planning for future development which takes into account management and protection of the water quality of rivers, streams, and lakes within their jurisdiction. One of the most important actions that 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 Ogeechee River basin. The Georgia EPD 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 to 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, and regulation of dams for compliance with the Safe Dams Act.

In 1997, to address concerns regarding overuse of groundwater in coastal Georgia, Georgia EPD developed the "Interim Strategy for Managing Salt Water Intrusion in the Upper Floridan Aquifer of Southeast Georgia" to address concerns regarding the general regional use of groundwater throughout coastal Georgia that is leading to declining water levels in the Floridan aquifer. Among the interim strategy inclusion policies such as establishing caps on ground water use in the capped areas of Glynn County, Chatham County and southern portions of Bryan and Effingham Counties, reduction in ground water use in Chatham County by at least 10 million gallons per day by December 2005.

7.2 General Basinwide Management Strategies

There are many statewide programs and strategies that play an important role in the maintenance and protection of water quality in the Ogeechee basin. These general strategies are applicable throughout the basin to address both point and nonpoint source controls.

7.2.1 General Surface Water Protection Strategies

Antidegradation

The State of Georgia considers all waters of the state as high quality 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 C.F.R. 131.12, will be achieved before lowering of water quality is allowed for high quality water.

The antidegradation review process is triggered at such time as a new or expanded point source discharge is proposed that may have some effect on surface water quality. 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 only be considered 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 shall be maintained and protected.

Water Supply Watershed Protection Strategy

As population continues to increase within the Ogeechee 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” which define, among other things, measures that local governments are encouraged to take to protect drinking water sources. The “guidelines” are entitled Rules for Environmental Planning Criteria, and establish environmental protection criteria for five environmental categories: water supply watersheds, groundwater 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 upon 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 seven (7) mile radius of the intake and 50/75 feet outside the seven (7) mile radius; and

- A reservoir management plan (including 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) shall have no specified minimum criteria; and
- An intake with a water supply reservoir shall have a minimum of 100 feet natural buffer within a seven 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 (DWP) 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 upon EPD's other assessment and prevention programs, including the Well Head Protection Program, the Vulnerability Assessment and Waiver Program and the River Basin Management Plans, by soliciting active public participation from the local communities and 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, or total maximum daily load, 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 2000. Georgia public noticed and submitted a draft 303(d) list package to the EPA in February 2000. The public and EPA reviewed the draft 303(d) list package and provided comments in March 2000. Georgia reviewed the input, made appropriate changes and submitted a final 303(d) listing to the EPA in April 2000. EPA approved the Georgia list in August 2000.

Georgia's 2000 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, 1998-1999*. 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 Ogeechee 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.

NA Waters assessed as supporting designated uses. These waters are not part of 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 within two years 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 1998-2000. These waters are not part of the Georgia 303(d) list.
- X Waters on the Georgia 303(d) list. These segments are assessed as not supporting or partially supporting designated uses, and may require additional controls to achieve designated uses. These segments make up the Georgia 303(d) list.

Georgia will address a number of the listed waters in the 2000-2001 time period, however, the majority of work on segments in the Ogeechee River will be addressed in the next iteration or cycle of Savannah river basin planning in 2001-2005.

7.2.2 Management of Permitted Point Sources

The strategies in this section strive to minimize adverse effects from municipal, industrial, and concentrated discharges. Permitted discharges of treated wastewater are managed via 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 only be considered 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 shall 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) toxic pollutants identified with point source discharges. Permits associated with identified problems will be evaluated to determine if a reopening of the permit is appropriate to adequately address the problem.

Watershed Assessment Requirements

A watershed assessment is generally 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 a 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 towards assuring 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.) impact 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 the 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 ten years, various upgrades and improvements have been made to industrial and municipal treatment systems throughout the Ogeechee River Basin. The funding for these projects has come from state and federal construction grants and loans 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 that are 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 National Pollution Discharge Elimination System (NPDES) and meet all the requirements of that system. In Georgia, with very few exceptions, surface discharge permits will only be issued 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 as this is deemed to be an operationally achievable number even if a facility does not have dechlorination equipment installed. Facilities which are given a limitation more stringent than 0.5 mg/l which do not already have dechlorination equipment installed, are given up to a two year schedule in which to meet the limitation. All discharging facilities which 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 be 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 is assessed in accordance with the Georgia Rules and Regulations for Water Quality Control. The results of the assessment can be used to trigger either 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 shall be free from material related to discharges which 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. At the present time, there are no data to suggest phosphorus loading problems in the Ogeechee River basin.

Temperature

Permits issued for facilities which discharge to primary trout streams are required to have no elevation of natural stream temperatures. Permits issued for facilities which 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 discharges, with primary focus on runoff from industrial operations and large urban areas. The EPA promulgated Storm Water Regulations on November 16, 1990. EPD subsequently received delegation from the EPA in January 1991 to issue General Permits and regulate storm water in Georgia. EPD has developed and implemented a strategy which assures 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 which they own or operate, and incorporate detailed storm water management programs. These programs may include such measures as structural and non-structural 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 Rule addresses only municipalities with populations greater than 100,000 people and construction sites larger than five acres. EPA is proposing a Phase II Rule for municipalities with populations less 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 impact 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 eleventh 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 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 which 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

The Georgia Environmental Protection Division (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 loading: 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 non-regulatory approach. This approach uses cooperative partnerships with various agencies and a variety of programs. A brief description of these agencies and outline of their functions and programs is provided below.

Soil and Water Conservation Districts (SWCDs)

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 best management practices (BMPs).

Georgia Soil and Water Conservation Commission (GSWCC)

Georgia's SWCDs receive no annual appropriations and are not regulatory or enforcement agencies. Therefore, the GSWCC was also formed in 1937 to support the SWCDs. GSWCC has been designated as the administering or lead agency for agricultural nonpoint source (NPS) pollution prevention in the state. The GSWCC develops NPS 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 provide education and oversight for the Georgia Erosion and Sedimentation Act.

There are a number of other agricultural agencies administering 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. Georgia's 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 groundwater. 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 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 serve to address resource concerns related to agricultural land uses in a coordinated fashion over the next five 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 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, comprised 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 as \$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.

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 there are three major conservation programs from USDA that 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. Also, 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 which recommended a voluntary approach to the implementation of best management practices (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 best management practices.

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, 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 BMP 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 state water quality or federal wetlands requirement violations.

Additional requirements are imposed within the National Forest areas of Georgia. Each National Forest produces and regularly updates and Land and Resource Management Plan to guide timber harvest and other activities. These plans establish long range goals and objectives; specific management prescriptions and the vicinity in which they will occur; standards and guidelines on how management prescriptions will be applied; and monitoring procedures to assure the Plan is followed.

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 water bodies. The first is the division between 1) statutory responsibilities for management of water quality, granted to EPD, and 2) local government's Constitutional responsibility for management of the land activities which affect urban water bodies. The second impediment is the widespread nature of the nonpoint sources and the variety of activities which may 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 is responsible for administering and enforcing a variety of permit programs, including permitting of 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 non-point 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 non-regulatory 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 which 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:

- Implement local nonpoint source (NPS) management programs, streambank and stream restoration activities, and community Adopt-A-Stream programs.
- Develop and disseminate local watershed planning and management procedures.
- Implement state and local Erosion and Sedimentation Control Programs.
- Prepare and disseminate technical information on best management practices and nonpoint source monitoring and assessment.
- Implement NPS education programs for grades K through 12 through Project WET (Water Education for Teachers), as described in Section 7.3.6.
- Implement the Georgia Adopt-A-Stream Program, as described below in Section 7.3.6.
- Identify and evaluate 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 found in Title 44 of the Code of Federal Regulations Parts 59-79. 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 to maintain 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 federal-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 which Governor 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 protects natural and historic resources by acquiring and managing land in the river corridor; Significant Sites, which are tracts of land which DNR will acquire and operate as a traditional state public-use facility: wildlife management or public fishing area, park or historic site, natural area, or greenway; and Restoration Sites, which are tracts of land which 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 state-wide 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 to 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 they become better informed of the values and functions of wetlands. We still suffer 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

While the 1993 Federal Administration Wetlands Plan calls for a concerted effort by EPA and other federal agencies to work cooperatively toward achieving a 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 upon 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 (COE) 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 ten acres above the "headwaters" point of non-tidal streams where the annual average flow is less than 5 cubic feet per second. Enforcement is carried out by the COE and EPA in freshwater wetlands. Normal agricultural and silvicultural operations are exempted under Section 404 regulations.

The COE may require wetland mitigation activities in association were permitting, including creation, restoration, and protection of wetlands. COE may also require

wetland restoration in case of violations. In the settlement of violations, restorations occurred on 16.8 acres in 1994, and 17.8 acres in 1995.

Land Acquisition

The Department of Natural Resources (DNR), 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.

Beginning in 1990 Governor Zell 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/Stewardship Strategies

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

Georgia has chosen a two-pronged approach to encourage stewardship via 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, lays the groundwork for behavior change and is often an important pre-requisite for effective implementation of BMPs and comprehensive watershed management programs.

General goals for stakeholder involvement and stewardship strategies are:

- Generate local support for nonpoint source management through public involvement and monitoring of streams and other water bodies and of results of management actions.
- Increase individual's awareness of how they contribute to nonpoint source pollution problems and implement appropriate strategies to motivate behavior 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 clean-ups, 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 clean ups.

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 NPS pollution (especially, where land use is largely agricultural crop production). Examples of agricultural NPS pollution are presented in workshops, videos and manuals (e.g., excess fertilizer and animal waste). In north Georgia, the focus is generally silvicultural NPS pollution (especially, in areas adjacent to the Chattahoochee and Oconee National Forests). Adopt-A-Stream Programs in urban areas address construction and urban runoff NPS pollution. Workshops and training sessions emphasize the connection between land use, 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 an education and action component on a local stream. Volunteers commit for a minimum of one 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 clean-ups, and 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 either 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. An “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 bi-monthly 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 over 1000 volunteers cleaning up river segments in over 50 locations. In addition, the Georgia Adopt-A-Stream Program conducts numerous presentations around the State.

Georgia Project WET (Water Education for Teachers) Program

A report outlining a plan for nonpoint source education in Georgia was completed in 1994. The “Georgia Urban Waterbody Education Plan and Program”, 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 both formal and non-formal educators.

In October 1996, EPD selected Project WET (Water Education for Teachers) Curriculum as the most appropriate water science and education curriculum for the State. The Project WET Curriculum is an interdisciplinary curriculum of school, museum, university pre-service class, or a community organization. The goals of the Georgia Project WET Program are facilitate and to promote awareness, appreciation, knowledge and stewardship of water resources through the development and dissemination of classroom (K-12) ready teaching aids.

Since 1997, several Project WET Facilitator Training Workshops have been successfully completed in Athens, Atlanta, Dahlonega, Macon, Savannah, Valdosta, and Warner Robbins with a total of 141 Project WET Facilitators trained in Georgia. In addition, over 115 Project WET Educator Workshops have been successfully completed in Georgia with more than 2,000 educators implementing the Project WET Curriculum statewide.

Currently in the Ogeechee River Basin, there are 19 Project WET Facilitators with over 250 educators having received certified Project WET training. In addition, Oatland Island Environmental Education Center educators are certified Project WET Facilitators and conduct Project WET workshops for educators in the lower portions of the Ogeechee River Basin. The pre-service program for education students at Georgia Southern University has certified over 100 early childhood and middle school education students as Project WET educators.

Georgia Project WET provides facilitators and educators the use of additional water resources such as the Enviroscape Module and the Ground Water Module, demonstration tools used to emphasize the impact of nonpoint source pollution to surface and ground waters pollution. In addition, the newsletter, “The Dragonfly Gazette,” is published and distributed quarterly to over 2500 teachers and environmental educators.

The Georgia Project WET Program has been nationally recognized for its training strengths and techniques – specifically the use of arts in environmental education. The Georgia Project WET Program in conjunction with International Rivers Network offers educators in Georgia the opportunity to participate in the “River of Words,” an international poetry and art contest for student (K-12). This contest provides students with the opportunity to explore their own watersheds and to learn their ‘ecological’ addresses through poetry and art. National winners are selected by the former U.S. Poet Laureate, Rob Hass, and the International Children’s Art Museum. Annually, only eight students are selected as the National Grand Prize winners to be honored at the Library of Congress in Washington, DC and treated to many V.I.P. tours of the nation’s capital. Since 1997, five students from Georgia have been recognized as National Grand Prize Winners and an additional 20 students from Georgia have been as National Finalists.

The Georgia Project WET Program provides educators with ‘River of Words – Teacher’s Guide’ along with resource information specific to Georgia. Annually, selected poetry and art are on display throughout Georgia for the year following the contest.

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 U.S. EPA 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 anti-degradation 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 clean-up ground water in the unlikely event pollution were to occur. 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 in 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 the State's Department of Natural Resources) which 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/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 and/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 clean-up 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.

Additionally, 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 by the Department of Community Affairs; and on-site sewage

disposal, by the Department of Human Resources. EPD has established formal Memoranda of Understanding (MOU) with these agencies. The Georgia Groundwater Protection Coordinating Committee was established in 1992 to coordinate groundwater 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 that are targeted to address concerns and priority issues for the Ogeechee River Basin which were described in Section 6. Strategies are presented for each issue of concern, with divisions by geographic area and/or HUC Unit as appropriate. For each of the identified concerns, the management strategy 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 may simply consist of increased monitoring; in other situations, the stakeholders in the subbasin will need to develop innovative solutions to these water quality issues. While EPD will continue to provide technical oversight, conduct monitoring surveys as needed, and evaluate data on a basin-wide scale, locally-led efforts in the subbasins will be required to help to monitor, assess, restore, and maintain water quality throughout the Ogeechee River Basin.

7.3.1 Metals

Ogeechee Coastal (Hydrologic Unit 03060204)

Problem Statement

The water use classification of fishing was not fully supported in one segment of the Newport River due to an exceedance of the water quality standard for selenium due to nonpoint sources.

General Goals

Meet water quality standards to support designated stream classification of fishing.

Ongoing Efforts

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

Identified Gaps and needs

EPD needs to conduct additional ambient metals sampling in South Newport River. Future investigation of atmospheric selenium sources is needed (e.g. Coal burning power plant emissions). In addition, local governments should be encouraged to address potential non-point sources (e.g.; stormwater run-off, etc.) of selenium.

General Strategies for Action

EPD needs to conduct additional sampling in the Newport River in order to determine its current water quality status.

Specific Management Objectives

Monitor ambient selenium concentrations in the Newport River to assess current water quality status. Determine if the problem is a matter of sample contamination, and if

it is not, conduct further investigations to identify sources. If exceedance were due to sample contamination, take steps to remove segment from the Georgia 303(d) List.

Action Plan

Additional sampling of South Newport River will be conducted in calendar years 2002 to document selenium concentrations. These efforts will be coordinated with EPDs Air Protection Branch in order to evaluate potential airborne sources.

7.3.2 Fecal Coliform Bacteria

Problem Statement

The water use classification of fishing was not fully supported in several water body segments due to exceedences of the water quality standards for fecal coliform bacteria. These water quality exceedences are found in a number of stream segments in the Ogeechee River basin and are primarily attributed to urban runoff, septic systems, sanitary sewer overflows, rural nonpoint sources, and/or animal wastes. A common strategy is proposed for addressing fecal coliform bacteria throughout the basin. However, achieving standards in individual stream segments will depend on the development of site specific local management plans.

Upper Ogeechee River Subbasin (Hydrologic Unit 03060201)

The water use classification of fishing was not fully supported in one Ogeechee River mainstem segment and six tributary stream segments due to exceedences of the water quality standard for fecal coliform bacteria. These may be attributed to a combination of urban runoff, septic systems, sanitary sewer overflows, rural nonpoint sources and/or animal wastes.

Lower Ogeechee River Subbasin (Hydrologic Unit 03060202)

The water use classification of fishing was not fully supported in five tributary stream segments due to exceedences of the water quality standard for fecal coliform bacteria. These may be attributed to a combination of urban runoff, septic systems, sanitary sewer overflows, rural nonpoint sources and/or animal wastes.

Canochee River Subbasin (Hydrologic Unit 03060203)

The water use classification of fishing was not fully supported in one Canoochee River mainstem segment and three tributary stream segments due to exceedences of the water quality standard for fecal coliform bacteria. These may be attributed to a combination of urban runoff, septic systems, sanitary sewer overflows, rural nonpoint sources and/or animal wastes.

Ogeechee Coastal Subbasin (Hydrologic Unit 03060204)

The water use classification of fishing was not fully supported in six tributary stream segments due to exceedences of the water quality standard for fecal coliform bacteria. These may be attributed to a combination of urban runoff, septic systems, sanitary sewer overflows, rural nonpoint sources and/or animal wastes.

General Goals

Meet water quality standards to support designated water uses. Increase public awareness of fecal coliform bacteria pollution through coordinated education and outreach efforts.

Ongoing Efforts

EPD administers and enforces a variety of permit programs designed to facilitate the management of urban runoff, including both point and nonpoint source controls. EPD's Nonpoint Source Program regulates municipal and industrial storm water discharges through the National Pollutant Discharge Elimination System (NPDES) permitting process. Sanitary sewer overflows are managed through EPD's Permitting Compliance and Enforcement Program. Animal wastes in Georgia are addressed through the Memorandum of Agreement (MOA) with NRCS and SWCC and through recently adopted rules designed to regulate Concentrated Animal Feeding Operations (CAFOs) for swine. This includes a requirement for certain operations to obtain individual NPDES permits.

In addition to regulatory activities, EPD assists in the development of local solutions to water quality problems by administering grant programs and providing technical assistance to various regional and local watershed management initiatives. EPD also conducts a variety of outreach and public education programs addressing urban runoff in general, point and Nonpoint source pollution, BMP implementation, regulatory requirements, and cooperative or non-regulatory approaches.

The Georgia Department of Human Resources (DHR) Division of Public Health - Environmental Services has promulgated new rules (O.C.G.A Chapter 290.5.26) developed to regulate the design, operation, and maintenance of on-site sewage management systems. DHR subsequently formed the Onsite Sewage Management Systems Technical Review Committee in 1999. The Committee's function will be to make recommendations to the department regarding the approval of new systems, assist the Department with the development and revision of standards and guidelines for new technology, assist with the adoption of periodic updates to the Manual for On-Site Sewage Management Systems, and serve as the final authority in contested interpretation issues regarding the Rules and the Manual for On-site Sewage Management Systems.

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 implementations. Sustainable Agriculture and Farm-A-Syst Training will be scheduled within the basin. The University of Georgia and ARS have proposals for assessing nutrient and fecal coliform bacteria reducing BMPs on 10 farms that will have statewide implications. 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 areas. The LWGs develop proposals for USDA or other funding to address identified resource concerns.

The University of Georgia College of Agriculture and Environmental Sciences' Animal Waste Awareness in Research & Extension (AWARE) program conducts research on animal waste management and provides public education through Southeast Sustainable Animal Waste Workshops and a variety of Internet publications. The University of Georgia is also testing agricultural uses of municipal biosolids in the Upper Ogeechee River subbasin.

Local Soil and Water Conservation Districts (SWCDs) and Resource Conservation and Development (RC&D) Councils are working with producers to utilize animal waste according to Nutrient Management Plans through their Lagoon Pumpout Program in the Upper and Lower Ogeechee and Canoochee subbasins, as well as in the Newport River basin.

The Newport River area is a Priority Area for USDA Cost-Share funds to implement agricultural BMPs through NRCS' EQIP Program.

Identified Gaps and Needs

Sources of fecal coliform bacteria in many stream segments are not clearly defined. In some cases, fecal bacterial loads may be attributable to natural sources (e.g. wildlife); alternative bacteriological sampling methods may be useful to distinguish between human, other mammalian, and avian fecal coliform bacteria sources. Sanitary sewer leaks and overflows may be a source of fecal coliform bacteria as well. 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 may be to continue to collect an adequate number of samples (four over a 30-day period) to support geometric mean calculations to determine if water quality standards are actually being exceeded.

Many fecal coliform bacteria reducing practices are relatively expensive and the percentage of reduction is often unknown. Many landowners are reluctant to spend today's dollars for long term amortization in uncertain future markets. Agricultural BMPs and cost share dollars (Farm Bill), grants (Section 319) and should be concentrated in priority watersheds with sufficient technical workforce to implement BMPs through long term agreements or contracts to reduce sediment loading.

Additional efforts should be directed toward increasing public awareness of fecal coliform bacteria pollution, with an emphasis on potential sources and BMPs. State and basin-wide coordination between agencies and organizations providing public education and technical assistance may help to extend outreach efforts.

Strategies for Action

Separate strategies are needed to address Nonpoint fecal coliform bacteria loadings for urban and rural sources.

A. General 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 five-year phase of the basin management cycle, management will concentrate on source control and planning. Evaluation of the efficacy of this approach will be made during the basin strategy reevaluation scheduled for 2005 in accordance with the statewide RBMP management cycle. In addition, the EPA has developed a number of TMDLs for 303(d) listed streams in the Ogeechee River Basin. EPD will, along with partner agencies such as local governments, NRCS, GSWCC, GFC, be implementing the TMDLs.

Specific Management Objectives

Stakeholders should work together to encourage and facilitate local watershed planning and management to ensure that designated water uses are supported.

Agricultural agencies will provide technical and educational assistance to producers for the purpose of facilitating agricultural BMP implementation.

Management Option Evaluation

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

Action Plan

EPD will monitor and assess use support in listed stream segments and encourage local efforts to address Nonpoint source pollution. 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 and complete sampling by December, 2002 in accordance with the statewide RBMP cycle.

EPD will continue to ensure that all permitted sources remain in compliance with permitted effluent limitations for fecal coliform bacteria. EPD will also request a comprehensive watershed assessment, focusing on both point and nonpoint sources, from localities applying for new or expanded NPDES point source discharge permits. The intent is to direct localities' attention toward current and future Nonpoint source issues in their watersheds 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 NPDES and Permitting and Compliance and Enforcement (PCEP) Programs and encourage local planning to address management on a basin-wide scale. EPD will implement approved TMDLs.

Local governments will continue to operate and maintain their sewer systems and wastewater treatment plants, monitor land application systems, develop and implement regulations, zoning and land use planning, and implement local watershed initiatives and monitoring programs. 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 jurisdiction.

DHR will continue to regulate on-site sewage management systems and will work to educate local governments and citizen groups about the need for proper design, construction, and maintenance of septic systems to protect water quality. DHR will also utilize the criteria presented in the Growth Planning Act for septic system setbacks from high value waters. Local municipalities should work with the local health departments to identify locations of septic systems and educate owners about the proper care and maintenance of septic systems.

EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of urban streams. Citizen groups will implement Adopt-A-Stream programs, and work with local governments in implementing watershed initiatives.

Method for Tracking Performance

EPD tracks point source discharges through inspections and evaluations of self-monitoring data. An evaluation of the status of listed water bodies will be made coincident with the next iteration of the RBMP cycle for the Ogeechee River basin in 2005.

B. General Strategies for Rural Sources

Agricultural cost share dollars (Farm Bill), grants (Section 319), and loans (Clean Water Act State Revolving Fund) need to be concentrated in priority watersheds with sufficient technical workforce to implement BMPs through long term agreements or contracts.

Specific Management Objectives

Stakeholders should work together to encourage and facilitate local watershed planning and management to ensure that designated water uses are supported.

Agricultural agencies will provide technical and educational assistance to producers for the purpose of facilitating agricultural BMP implementation.

Management Option Evaluation

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

Action Plan

EPD will monitor and assess use support in listed streams, encourage local planning efforts, and regulate point sources under the NPDES program. EPD will continue to ensure that all permitted sources remain in compliance with fecal coliform bacteria limits. EPD will also continue monitoring and assessment of Land Application Systems. EPD will implement approved TMDLs.

GSWCC and local SWCDs and RC&D councils, with assistance from NRCS, will continue to support adoption of BMPs for animal waste handling and will follow up on complaints related to fecal coliform bacteria associated with 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 contain excessive fecal coliform loads from animal and cropland operations.

Local SWCDs will convene Local Work Groups to identify local resource concerns and develop proposals for funding to address these concerns.

The DHR will continue to regulate on-site sewage management systems and will work to educate local governments and citizen groups about the need for proper design, construction, and maintenance of septic systems to protect water quality. The DHR will also utilize the criteria presented in the Growth Planning Act for septic system setbacks from high value waters. Local municipalities should work with the local health departments to identify locations of septic systems and educate owners about the proper care and maintenance of septic systems.

The University of Georgia will provide on-farm assistance to local producers through their Farm-A-Syst Program.

EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of urban streams. Citizen groups will implement Adopt-A-Stream programs and work with local governments in implementing watershed initiatives.

Method for Tracking Performance

Agricultural agencies will track rates of BMP implementation for cropland and animal operations. An evaluation of the status of listed water bodies will be made coincident with the next iteration of the RBMP cycle for the Ogeechee River basin in 2001-2005.

7.3.3 Erosion and Sedimentation

Problem Statement

Water use classifications for fishing and/or recreation are potentially threatened in many water body segments by erosion and loading of sediment which can alter stream morphology, impact habitat, and reduce water clarity. Potential sources include urban runoff and development (particularly construction), unpaved rural roads, stream erosion (including head cutting, bank erosion, and shifting of the bedload), forestry practices, and agriculture. Potential threats from sediment loading are possible throughout the Ogeechee River Basin, although there are no stream segments listed at this time in the basin as not fully supporting designated water uses due to poor fish communities or sedimentation. 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.

Upper Ogeechee River Subbasin (Hydrologic Unit 03060201)

The 1992 Georgia Forestry Commission (GFC) compliance survey examined eight sites involving 1,583 acres in this sub-basin. Four sites each were evaluated on private lands and forest industry lands. Overall, 86 percent of harvested acres and 82 percent of main haul road miles were in compliance with BMPs. No site-prepared acres or regenerated acres were evaluated. By ownership, compliance for roads and harvesting on private lands was 75 percent and 84 percent, respectively. Compliance on forest industry land for roads and harvesting was 93 percent and 92 percent, respectively. Another BMP survey was conducted during 1998, but the results are not complete.

Lower Ogeechee River Subbasin (Hydrologic Unit 03060202)

The 1992 Georgia Forestry Commission (GFC) compliance survey examined nine sites involving 1,087 acres in this sub-basin. Four sites were evaluated on private land and five were on forest industry lands. Overall, 96 percent of harvested acres and 94 percent of main haul road miles were in compliance with BMPs. No site preparation or regenerated acres were evaluated. By ownership, compliance for roads and harvesting on private lands was 81 percent and 95 percent, respectively. Compliance on forest industry land for roads and harvesting was 100 percent and 97 percent respectively. Another BMP survey was conducted during 1998, but the results are not complete.

Ogeechee Coastal Subbasin (Hydrologic Unit 03060204)

The 1992 Georgia Forestry Commission (GFC) compliance survey examined seven sites involving 430 acres in this subbasin. Three sites were evaluated on private lands and four on forest industry lands. Overall, 99 percent of harvested acres and 100 percent of main haul road miles were in compliance with BMPs. No sites were evaluated for site preparation or regeneration. By ownership, compliance for roads and harvesting on private lands was 100 percent and 100 percent respectively. Compliance on forest industry lands for roads and harvesting was 100 percent and 99 percent respectively. Another BMP survey was conducted during 1998, but the results are not complete.

Canochee River Subbasin (Hydrologic Unit 03060203)

The 1992 Georgia Forestry Commission (GFC) compliance survey examined seven sites involving 357 acres in this sub-basin. Six sites were evaluated on private lands and one on forest industry lands. Overall, 92 percent of harvested acres and 100 percent of main haul road miles were in compliance with BMPs. No site prepared or regenerated acres were evaluated. By ownership, compliance for roads and harvesting on private lands was 100 percent and 91 percent, respectively. Compliance on forest industry lands for roads and harvesting was 100 percent and 98 percent, respectively. Another BMP survey was conducted during 1998, but the results are not complete.

General Goals

Control erosion and sedimentation from land disturbing activities in order to meet narrative turbidity water quality standards and support designated uses. Increase public awareness of erosion and sedimentation through coordinated education and outreach efforts.

The GFC will encourage implementation of the newly revised 1999 forestry BMPs through workshops and demonstrations.

Ongoing Efforts

Forestry and Agriculture both have voluntary E&SC programs built around implementation of BMPs and water complaint resolution procedures in place. GSWCC recently updated and is distributing the Manual for Erosion and Sediment Control in Georgia and the Field Manual for Erosion and Sediment Control in Georgia. The GSWCC, with its agricultural partners, has produced and distributed three E&SC pamphlets; "Guidelines for Streambank Restoration", "A Guide to Controlling Erosion with Vegetation", and "Agricultural Management Practices". These, along with a number 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) which are comprised of resource professionals from a variety of disciplines and interested stakeholders at the local level to identify resource concerns in their areas. These LWGs develop proposals for USDA or other funding to address identified resource concerns.

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 throughout local talks, workshops, etc. The Georgia Forestry Association and the American Forest and Paper Association (AF&PA) sponsor Master Timber Harvesters Workshops with the goal of training 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. As they become standard within the industry, the new Forestry BMP Guidelines, printed in January, 1999, will result in additional sedimentation reductions with more riparian tree cover left over perennial and intermittent streams.

EPD serves as the "Issuing Authority" providing permitting, inspection, and compliance enforcement services in those localities across the State where local Erosion and Sedimentation Control Ordinances or Programs are not yet established. EPD is also continuing its efforts to develop a NPDES General Permit (No. GAR100000) for storm water discharges associated with construction activity. The permit will provide guidelines and regulations for effective control of silt, sediment and other pollutants which are carried by storm water runoff from construction sites. The General Permit has been

issued, appealed, and overturned four times between 1992 and 1998, but was approved in 2000.

An Erosion and Sedimentation Control (E&SC) Advisory Committee developed an Erosion and Sediment Control Complaint Resolution Procedure by which concerned citizens or other parties may register E&SC complaints. The procedure is a three-step process with Local Issuing Authorities serving as the primary contact, followed by the local Soil and Water Conservation District, and finally EPD in some cases. The purpose of the procedure is to provide timely and workable solutions to E&SC control complaints through local Soil and Water Conservation Districts.

There are several erosion educational initiatives underway which have an urban focus. 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 for 8 to 11 units of government each year. A task force established by the Lieutenant Governor and the Erosion and Sediment Control Technical Study Committee, 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 stream banks.

In 1997, EPD, in cooperation with the University of Georgia, prepared and distributed the Land Development Provisions to Protect Georgia Water Quality report. The report describes provisions which may be modified or added to local development programs to better protect water quality. Portions of the report address water quality impacts from storm water runoff and its relationship to urban development.

Local Soil and Water Conservation Districts and Resource Conservation and Development (RC&D) Councils are working with crop producers to reduce erosion and sedimentation through their No-Till Drill Program in the Upper and Lower Ogeechee and Canoochee River subbasins as well as in the Newport River basin.

The Lower Ogeechee River sub-basin and Newport River basin are Priority Areas for USDA Cost-Share funds to implement agricultural BMPs through NRCS' EQIP Program.

The Georgia Soil and Water Conservation Commission (GSWCC) is demonstrating agricultural BMPs related to animal operations in the Canoochee River subbasin.

Forestry BMP Education

From 1996 through 1999, the GFC offered a 3-day Master Timber Harvester Workshop. During the 3-year period, the workshop was attended by the following number of personnel affiliated with timber buyers and loggers in the four subbasins:

- Upper Ogeechee River Subbasin (Hydrologic Unit 03060201) – 115 personnel
- Lower Ogeechee River Subbasin (Hydrologic Unit 03060202) – 88 personnel
- Ogeechee Coastal Subbasin (Hydrologic Unit 03060204) – 55 personnel
- Canoochee River Subbasin (Hydrologic Unit 03060203) – 93 personnel

Identified Gaps and Needs

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

Many privately owned sawmills are not members of the AF&PA. These mills and their producers are not required to attend the Master Timber Harvesters Workshops at this time. The GFC, UGA, GFA, and the Southeastern Wood Producers Association are working on a solution. A need still exists for education of private landowners who are selling timber for the last time prior to land development. Many such landowners attempt to maximize return on timber, sometimes at the expense of BMPs.

Much of the sediment being produced and adversely impacting streams and lakes is associated with development and maintenance of unpaved rural roads. In many instances E&SC plans, implementation, inspection, and enforcement are not adequate on unpaved rural road projects. Without aggressive inspection and enforcement, contractors sometimes tend to allow erosion to occur and attempt mitigation 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. Additional monitoring may be needed to quantify the impact of unpaved rural roads as a source of sedimentation into streams.

Additional efforts should be directed toward increasing public awareness of erosion and sedimentation, with an emphasis on potential sources and controls. State and basin-wide coordination between agencies and organizations providing public education and technical assistance may help extend outreach efforts.

Adverse impacts of excess sediment loading include degradation of habitat and reduction of species diversity. These types of impacts are best evaluated 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 also include habitat assessment. The WRD is working with the IBI (Index of Biologic Integrity) 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.

General Strategies for Action

Many agricultural sediment reduction practices are relatively 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 State Revolving Fund) should be concentrated in priority watersheds with sufficient technical workforce to implement BMPs through long term agreements or contracts to reduce sediment loading. An understanding of the role of erosion and sedimentation in urban streams is incomplete at this time. Most of these streams are impacted by a variety of stressors. An incremental or phased approach is needed to address these issues.

Key Participants and Roles

GFC: encourage implementation of the newly revised 1999 forestry BMPs through workshops and demonstrations.

American Forest and Paper Association (AF&PA): The forest products industry has a strong record of stewardship on the land it owns and manages. Member companies have agreed to a Sustainable Forestry Initiative (SFI) program. The goal of the program is to improve the performance of member companies and licensees, and set new standards for the entire forest industry as well as for other forest landowners through implementation of the following twelve objectives:

1. Broaden the practice of sustainable forestry by employing an array of scientifically, environmentally, and economically sound forest practices in the growth, harvest, and use of forests.
2. Promptly reforest harvested acres to ensure long-term forest productivity and conservation of forest resources.
3. Protect the water quality in streams, lakes, and other water bodies by establishing riparian protection measures based on soil type, terrain, vegetation, and other applicable factors, and by using EPA approved Best Management Practices in all forest management operations.
4. Enhance the quality of wildlife habitat by developing and implementing measures that promote habitat diversity and the conservation of plant and animal populations found in forest communities.
5. Minimize the visual impact by designing harvests to blend into the terrain by restricting clear-cut size (120 acres average) and/or by using harvest methods, age classes, and judicious placement of harvest units to promote diversity in forest cover.
6. Manage company lands of ecologic, geologic, or historic significance in a manner that accounts for their special qualities.
7. Contribute to bio-diversity by enhancing landscape diversity and providing an array of habitats.
8. Continue to improve forest utilization to help ensure the most efficient use of forest resources.
9. Continue the prudent use of forest chemicals to improve forest health and growth while protecting employees, neighbors, the public, and sensitive lands.
10. Broaden the practice of sustainable forestry by further involving non-industrial landowners, loggers, consulting foresters, and company employees who are active in wood procurement and landowner assistance programs.
11. Publicly report Program Participants' progress in fulfilling their commitment to sustainable forestry.
12. Provide opportunities for the public and the forestry community to participate in the commitment to sustainable forestry.

From a water quality perspective, Objectives 3 and 10 are extremely important.

Performance measures for Objective 3 state:

- Participants will meet or exceed all established BMPs, all applicable state water quality laws and regulations, and the requirements of the Clean Water Act for forestland.
- Participants will establish and implement riparian protection measures for all perennial streams and lakes and involve a panel of experts at the state level to help identify goals and objectives for riparian protection.
- Participants will individually, through cooperative efforts or through AF&PA, provide funding for water quality research.

Performance measures for Objective 10 state:

- Participants will encourage landowners that sell timber to reforest, following harvest, and to use BMPs by providing these landowners with information on the environmental and economic advantages of these practices.

- Participants will work closely with the Southeastern Wood Producers Association, the Georgia Forestry Association, the University of Georgia School of Forest Resources, the GFC, the Georgia Wildlife Resources Division, and others in the forestry community to further improve the professionalism of loggers through the Master Timber Harvesters program by establishing and/or cooperating with existing state groups to promote the training and education of loggers in:
 - i. BMPs, including road construction and retirement, site preparation, streamside management, etc.
 - ii. Awareness of responsibilities under the Endangered Species Act and other wildlife consideration.
 - iii. Regeneration and forest resource conservation.
 - iv. Logging safety.
 - v. OSHA and wage and hour rules.
 - vi. Transportation.
 - vii. Business management including employee training, public relations, etc.

Specific Management Objectives

Control erosion and sedimentation from land disturbing activities in order to meet narrative water quality standards.

Management Option Evaluation

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

Action Plan

EPD and WRD will continue to develop biological monitoring capabilities designed to assess aquatic life. EPD will work with local governments with the issuing authority for erosion and sedimentation controls, first through education and second through enforcement, to control erosion at construction sites, and will encourage local governments to implement land use planning.

GSWCC and local SWCDs and RC&D Councils with assistance from NRCS will provide technical and educational assistance to producers to encourage the implementation of BMPs to control erosion of agricultural lands. Local SWCDs will convene local workgroups to identify resource concerns and develop proposals for funding to address these concerns. The University of Georgia will provide on-farm assessments to local producers through their Farm-A-Syst Program.

The GFC will encourage implementation of the newly revised 1999 forestry BMPs through workshops and demonstrations. GFC will continue to monitor BMP implementation rates through biennial surveys and determine effectiveness of BMPs through habitat assessments and rapid bioassessments of the aquatic organisms above and below forestry operations. GFC will target landowner and user groups with low implementation rates for BMP education to encourage compliance with forestry BMP guidelines. GFC will work with AF&PA and forestry community to provide BMP training.

American Forest and Paper Association (AF&PA): Member companies will document performance measures for each objective through annual reports to AF&PA as required for Objective 11. AF&PA will issue an annual report to the public.

EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of streams. Citizen groups will implement Adopt-A-Stream programs and

work with local governments in implementing watershed initiatives. EPD and WRD will continue to develop biological monitoring capabilities designed to assess aquatic communities.

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 biennial surveys, and EPD through routine inspections of permitted projects, surveillance for any incidences of noncompliance, and enforcement activities. NRCS will track BMP implementation through its NIMS reporting system.

7.3.4 Fish Consumption Guidelines

Problem Statement

The water use classifications were not fully supported in several water body segments due to fish consumption guidelines for mercury and in one segment due to dieldrin. There are no known point source discharges or other identifiable anthropogenic sources of mercury or dieldrin in these watersheds. Mercury may be present in fish due to mercury content in the natural soils, from municipal or industrial sources, or from fossil fuel use. It is also possible that the elevated mercury level is related to global atmospheric transport and deposition.

Upper Ogeechee River Basin (Hydrologic Unit 03060201)

The water use classification of fishing was not fully supported in one segment of the Ogeechee River mainstem due to fish consumption guidelines recommended because of mercury residues. The guidelines are for largemouth bass, spotted sucker and redbreast sunfish. The water use classifications was not fully supported in Short Creek, a tributary to the Ogeechee River, due to fish consumption guidelines recommended because of mercury residue in sunfish.

Lower Ogeechee River Basin (Hydrologic Unit 03060202)

The water use classification of fishing was not fully supported in two Ogeechee River mainstem segments based on fish consumption guidelines due to mercury. The guidelines are for largemouth bass in one river segment and largemouth bass and redbreast sunfish in the second river segment.

Canoochee River Basin (Hydrologic Unit 0306023)

The water use classification of fishing was not fully supported in the Canoochee River mainstem and the Evans County Public Fishing Area (PFA) due to fish consumption guidelines recommended because of mercury residues. The guidelines are for largemouth bass, redbreast sunfish, and channel catfish in the river and largemouth bass in the PFA.

Ogeechee Coastal Subbasin (HUC 03060204)

The water use classification of fishing was not fully supported in Casey Canal due to fish consumption conditions recommended because of dieldrin residues in striped mullet.

General Goals

Work to protect human health by providing guidelines for consumption of fish.

Ongoing Efforts

DNR has monitored fish and issued fish consumption guidelines. There are no known point source discharges or other identifiable anthropogenic sources of either mercury or dieldrin in the Ogeechee River Basin watersheds. Ongoing efforts will focus on continued monitoring of residue levels and issuance of updated consumption guidelines.

The Ogeechee and Canoochee Rivers are coastal plain blackwater swamp systems. These systems are characterized by a high content of organic carbon (organic ligand humic substances), low alkalinity and pH, and naturally lower dissolved oxygen content. Blackwater systems have been found to have physico-chemical characteristics that provide both a sink for the accumulation of mercury from atmospheric deposition or other sources, and to provide an environment conducive to the methylation of mercury. As a result, baseline mercury residues found in fish tissues are higher than that found in other waterbodies having a different chemistry.

There is no known source of the dieldrin in the Casey Canal watershed, but it is thought that it may be due to historical use in termite control. This pesticide has been restricted from use and residues are expected to decrease over time due to chemical decay processes.

Identified Gaps and Needs

The source of mercury in the basin is not well quantified. Mercury within these watersheds is likely derived from natural sources or from atmospheric deposition.

The source of the dieldrin in Casey Canal is not well quantified. It is likely that the origin was from historical use in termite control. As this pesticide has been restricted from use, residue levels are expected to decrease over time.

General Strategies for Action

Because mercury and dieldrin are not originating from any known point or other identifiable anthropogenic sources, the strategy is to keep the fishing public notified of risks associated with fish consumption.

EPD and WRD will work to protect public human health by issuing fish consumption guidelines as needed, indicating the recommended rates of consumption of fish from specific waters. The guidelines are based on conservative assumptions and provide the public with factual information for use in making rational decisions regarding fish consumption.

Action Plan

- WRD and EPD will continue to sample and analyze fish tissue and issue fish consumption guidelines as needed. The next round of fish tissue sampling for this watershed will be considered in fiscal year 2002 in accordance with the river basin monitoring cycle.
- EPD will evaluate the need for additional sampling of different media (fish tissue, water and/or sediment), if localized anthropogenic sources are indicated.

Method of Tracking Performance

Trends in fish tissue concentration; number of Fish Consumption Guidelines.

7.3.5 Nutrients

Problem Statement

Excess nutrient loads are a potential concern for all surface waters, as they promote undesirable growths of floating and attached algae which 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 may also stimulate undesirable growths of attached algae in small rivers and streams. Protection of water quality will require basin-wide strategies to control nutrient loads.

Canochee River Subbasin (Hydrologic Unit 03060203)

The water use classifications of fishing; potentially threatened due to input of nutrients from agricultural runoff.

General Goals

Meet water quality standards and maintain nutrient loading at levels sufficient to support designated uses. Increase public awareness of stream nutrient loading through coordinated education and outreach efforts.

Ongoing Efforts

A key goal of the Clean Water Action Plan is the development of water quality criteria for nutrients by the year 2000. EPA has formulated a national strategy outlining the process and approach for the development of numeric criteria for nutrients and adoption of nutrient provisions in state water quality standards. Under the approach described in the new nutrient strategy, EPA will develop nutrient guidance documents for various types of waterbodies (e.g. rivers, lakes, coastal waters, and wetlands) over the next several years. States will be able to use these guidance documents and target ranges as they develop numeric criteria for nutrients as part of state water quality standards. EPA has formed a National Nutrient Team to guide the nutrient criteria development process and Regional Nutrient Teams will be formed in each EPA region.

EPD administers and enforces a variety of permit programs designed to facilitate the management of urban runoff, including both point and Nonpoint source controls. EPD's Nonpoint Source Program regulates municipal and industrial storm water discharges through the National Pollutant Discharge Elimination System (NPDES) permitting process. Water pollution control plant discharges and sanitary sewer overflows are managed through EPD's Permitting Compliance and Enforcement Program (PCEP). Animal wastes in Georgia are addressed through recently adopted rules designed to regulate Concentrated Animal Feeding Operations (CAFOs) for swine. This includes a requirement for certain operations to obtain individual NPDES permits.

In addition to regulatory activities, EPD assists in the development of local solutions to water quality problems by administering grant programs and providing technical assistance to various regional and local watershed management initiatives. EPD also conducts a variety of outreach and public education programs addressing urban runoff in general, point and Nonpoint source pollution, BMP implementation, regulatory requirements, and cooperative or non-regulatory approaches.

The University of Georgia College of Agriculture and Environmental Sciences' Animal Waste Awareness in Research & Extension (AWARE) program conducts research on animal waste management and provides public education through Southeast

Sustainable Animal Waste Workshops and a variety of Internet publications. The University of Georgia is also testing agricultural uses of municipal biosolids in the Upper Ogeechee sub-basin.

Local Soil and Water Conservation Districts and RC&D Councils are working with producers to utilize animal waste according to Nutrient Management Plans through their Lagoon Pumpout Program in the Upper and Lower Ogeechee and Canoochee subbasins as well as in the Newport River basin.

The Lower Ogeechee subbasin and Newport River basin are Priority Areas for USDA Cost-Share funds to implement agricultural BMPs through NRCS' EQIP Program.

The Georgia Soil and Water Conservation Commission (GSWCC) is demonstrating agricultural BMPs related to animal operations in the Canoochee River subbasin.

The U.S. EPA has developed a Nutrient Management Measure intended to be applied by the States to activities associated with the application of nutrients to agricultural lands. The goal of the measure is to minimize edge-of-field delivery of nutrients and leaching of nutrients from the root zone, as well as promote more efficient use of all nutrient sources that are available to agricultural operations.

Identified Gaps and Needs

The national response to the nutrient problem has been limited primarily because of concerns over the scale of the problem, and because of the tremendous variability of nutrient conditions, both natural and cultural, throughout the nation. Additional efforts should be directed toward increasing public awareness of stream nutrient loading, with an emphasis on potential sources and controls. State and basin-wide coordination between agencies and organizations providing public education and technical assistance may help to extend outreach efforts.

General Strategies for Action

Additional point and Nonpoint source controls such as agricultural best management practices may be implemented to minimize nutrient inputs and comply with future water quality standards. Landowners and managers of agricultural operations should be encouraged to adopt and implement Nutrient Management Plans.

Specific Management Objectives

Stakeholders should work together to encourage and facilitate local watershed planning and management, as well as the implementation of Nutrient Management Plans for agricultural operations, to ensure that designated water uses are supported.

Agricultural agencies will provide technical and educational assistance to producers for the purpose of facilitating agricultural BMP implementation.

Management Option Evaluation

GSWCC, NRCS, and the UGA will encourage the adoption of BMPs on agricultural lands. EPD will continue to encourage local government planning efforts, regulate point sources and encourage outreach through Adopt-A-Stream programs.

Action Plan

GSWCC and local agricultural agencies will continue to support adoption of BMPs for animal waste handling and cropland operations. 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 nutrient loads from animal and cropland operations.

EPD will continue monitoring and assessment of Land Application Systems and assist local government agencies and other organizations in public education and outreach efforts. EPD will monitor and assess use support in listed streams, encourage local planning efforts and regulate point sources under the NPDES program.

EPD will encourage citizen involvement through Adopt-A-Stream groups to address restoration of streams. Citizen groups will implement Adopt-A-Stream programs, and work with local governments in implementing watershed initiatives.

The University of Georgia will provide on-farm assessments to local producers through the Farm-A-Syst program.

Method for Tracking Performance

Agricultural agencies will track rates of BMP implementation for cropland and animal operations. An evaluation of the status of listed water bodies will be made coincident with the next iteration of the RBMP cycle for the Ogeechee River basin in 2001-2005.

7.3.6 Low Dissolved Oxygen

Problem Statement

Water use classification for fishing were not fully supported in several water body segments due to excursions of the water quality standards for dissolved oxygen. These excursions are primarily attributed to Nonpoint sources and to natural conditions.

Lower Ogeechee River Subbasin (HUC 03060202)

The water use classification of fishing was not fully supported in five tributaries due to dissolved oxygen concentrations less than standards. Low dissolved oxygen in the tributaries was due to nonpoint sources. Dissolved oxygen may be lower in these areas due to natural conditions.

Canoochee River Subbasin (HUC 03060203)

The water use classification of fishing was not fully supported in one Canoochee River mainstem segment and seven tributaries due to dissolved oxygen concentrations less than standards. Low dissolved oxygen in the mainstream segment was due to urban runoff and low dissolved oxygen in the tributaries was due to nonpoint sources, urban runoff, and a water pollution control plant discharge. Dissolved oxygen may also be lower in these areas due to natural conditions.

Ogeechee Coastal Subbasin (HUC 03060204)

The water use classification of fishing was not fully supported four tributary stream segments (Peacock Creek and Casey Canal) due to dissolved oxygen concentrations less than standards. Low dissolved oxygen in the tributaries was due to nonpoint sources. Dissolved oxygen may be lower in these areas due to natural conditions.

General Goals

Meet water quality standards to support designated water uses.

Ongoing Efforts

The Lower Ogeechee is a Priority Area for USDA Cost-Share funds to implement agricultural BMPs through NRCS's EQIP Program. Local Soil and Water Conservation Districts and RC&D Councils are working with producers to utilize animal waste according to Nutrient Management Plans through their Lagoon Pumpout Program.

The Georgia Soil and Water Conservation Commission (GSWCC) is demonstrating agricultural BMPs related to animal operations in the Canoochee River Sub-Basin. Local Soil and Water Conservation Districts and RC&D Councils are working with producers to utilize animal waste according to Nutrient Management Plans through their Lagoon Pumpout Program.

Identified Gaps and Needs

Low dissolved oxygen concentrations in this part of the state are often due to natural environmental conditions. Work is needed to identify and characterize natural background dissolved oxygen concentrations in this area.

General Strategies for Action

Low dissolved oxygen concentrations in the various streams in the Ogeechee River Basin were due to nonpoint sources and/or natural environmental conditions. EPD will address Nonpoint sources through a watershed protection strategy for the basin.

Specific Management Objectives

Maintain dissolved oxygen concentrations adequate to support aquatic life and meet water quality standards.

Action Plan

- EPD: monitor and assess use support in the listed waters and develop a watershed strategy for addressing Nonpoint sources.
- Local governments will implement storm water management strategies and manage operations of water pollution control plants.
- WRD will continue work to study habitat requirements for fish populations.
- NRCS will continue BMP implementation.
- Local S&WC Districts and RC&D Councils will continue Lagoon Pumpout Program.

Methods for Tracking Performance

A reevaluation of the status of the listed waterbodies will be made coincident with the next iteration of the RBMP management cycle for the Ogeechee River basin in 2001-2005.

7.3.7 Groundwater Quality and Quantity

Lower Ogeechee River Subbasin (HUC 03060202)

Issue A. Suburban water supply

Problem Statement

Water needs for residential and commercial development growth is a concern for Southeast Bryan County. The defined limit on availability of Floridan aquifer groundwater is having an impact on continued development in the county. This is apparent with pressures to reduce usage of the Floridan aquifer in the area and in southern Bryan County, without any other convenient source of water.

The general regional use of groundwater throughout coastal Georgia is leading to declining water levels in the Floridan aquifer. Such declining groundwater levels are reducing pressures in the aquifer sufficiently to allow seawater to enter the aquifer in Port Royal Sound north of Hilton Head Island, South Carolina and potentially elsewhere in that area and then begin to slowly moving towards Savannah, Georgia. All municipal, industrial, and agricultural users withdrawing water from the Floridan aquifer throughout this basin contribute to this salt-water intrusion problem.

General Goals

Stop the intrusion of salt-water before the municipal supply wells on Hilton Head Island, South Carolina and in Savannah, Georgia are contaminated.

Ongoing Efforts

After several years of working with the stakeholders throughout the coastal area, EPD developed the "*Interim Strategy for Managing Salt Water Intrusion in the Upper Floridan Aquifer of Southeast Georgia*" (dated April 23, 1997). This defines the EPD roles and requirements for studies and stakeholder efforts through December 31, 2005. The legislature has funded an extensive Sound Science initiative to provide some of the necessary information to determine what is happening in the aquifer and what can be done to minimize any problems. This shall all be discussed with stakeholders and used in developing the Final Strategy for water withdrawals in January, 2006. To meet these objectives, EPD will do the following:

- (1) Conduct expanded scientific (Sound Science effort) and feasibility studies to determine with certainty how to permanently stop the salt-water intrusion moving towards Hilton Head Island, South Carolina and Savannah, Georgia
- (2) Require the development of comprehensive local water supply plans in a 24 county area of southeast Georgia.
- (3) Create one or more technical advisory committees (TAC). With their input, the additional scientific information and the local water supply plans, develop a long-term ground water management plan for southeast Georgia by the end of the year 2005, which will protect the Upper Floridan aquifer from further salt-water intrusion.
- (4) Impose caps on ground water use in the Capped areas of Glynn County, Chatham County, and southern portions of Bryan and Effingham counties, to avoid worsening the rate of salt water intrusion at Hilton Head - Savannah and at Brunswick.
- (5) Reduce ground water use in Chatham County by at least 10 million gallons per day by December 31, 2005 through conservation and substitution of surface

water for ground water. Union Camp will provide at least 6.5 mgd of the total 10 Mgd of ground water reduction in Chatham County. This will be affirmed through reductions in ground water use permits.

- (6) Allow, on an interim basis, increases in groundwater withdrawals in the areas of southeast Georgia that have little impact on salt-water intrusion problem.
- (7) Encourage and promote water conservation and reduced ground water usage wherever feasible, throughout southeast Georgia.

Identified Gaps and Needs

EPD needs an expanded compliance effort to better account for actual amounts of groundwater withdrawals from the Floridan aquifer.

EPD, USGS and several consulting firms are working on creating improved computer modeling efforts to provide better and more complete information than was previously available regarding the impacts of all withdrawals on the aquifer.

EPD in conjunction with the USGS and contracted consulting firms is trying to identify alternative water sources to allow additional water from sources outside of the Floridan aquifer.

Strategies for Action

EPD and the coastal stakeholders need to implement the policies recommended in the Interim Strategy, be prepared to analyze any new information developed under the Sound Science initiative and eventually create the recommendations of policy measures for the final strategy policy.

EPD is currently investigating the potential water production from the Miocene aquifers above the Floridan aquifer. Test wells will be drilled and a determination made of general water potentials.

Key Participants and Roles

Georgia EPD: Monitor strategy efforts and inform stakeholders of progress.

South Carolina DHEC: Because of the contamination moving under Hilton Head Island, SC DHEC will be closely watching any recommendations Georgia will make on this matter and noting any progress Georgia may make to address the issue.

County and Local Municipal Governments: Each City in the area has it's own interest in economic development and residential growth. How will limited water impact it's own development? Can water conservation efforts allow more growth?

Public Citizen groups: Public participation is essential to insure public buy-in on any proposed interim measures and in the development of the final strategy.

Specific Management Objectives

EPD and others will encourage water conservation by all parties. EPD needs to insure that Chatham County will reduce their groundwater usage by 10 mgd by December 31, 2005. EPD will prevent any withdrawal increases within the rest of the Capped area, if not associated with any nearby withdrawal reductions to offset the increase. And lastly, limit new or increased Floridan aquifer groundwater withdrawals from elsewhere.

Management Option Evaluation

Apply the Interim Strategy to permitting actions in coastal Georgia.

Develop the Final strategy.

Action Plan

Implement the Coastal Interim Strategy through December 31, 2005

Develop the Final Management Strategy for action in January, 2006.

Extensive stakeholder involvement in all these matters is sought and encouraged.

Public meetings to update stakeholders shall be held regularly in the coastal area.

Methods for Tracking Performance

Account for accurate water withdrawals throughout the area, looking for the necessary mandated reductions.

Determine the velocity of the salt-water intrusion and see if the contaminant wedge is accelerating or decelerating in its movement towards Hilton Head Island, SC and Savannah, GA.

Issue B: Groundwater Surface water interactions

Problem Statement

Groundwater levels are also threatened due to high rates of pumpage of groundwater for agricultural irrigation. USGS presented evidence that agricultural groundwater usage may be responsible for a lower groundwater table and less recharge to streams. The data points suggest that pre-agricultural irrigation 7Q10s in the lower Ogeechee River were higher than 7Q10s since irrigation pressures began.

General Goal

Define whether agricultural withdrawals in the mid and upper basins are lowering aquifer levels sufficient to reduce groundwater flow into the streams, thereby reducing stream flow levels in the basin as a whole.

Ongoing Efforts

Problem has been noted and some initial investigatory steps have been taken by EPD. As manpower and funds become available in the future, EPD will try to determine whether this is an actual problem or not.

Identified Gaps and Needs

Additional data will be needed to illustrate if this actually is occurring. Future computer modeling will need to be done to determine if groundwater withdrawals are the potential reason for any surface water reductions in flow.

Action Plan

Gather more data and watch to see if this actually is a problem.

Methods for Tracking Performance

Continue to assess data as it is collected.

References

Georgia Environmental Protection Division. 1987. Water Availability and Use Report, Coastal Plain River Basins.

DRI/McGraw Hill. 1996. The Regional Economic Forecast of Population and Employment Comprehensive Study, Volume 1. Prepared for: Georgia Department of Natural Resources Environmental Protection Division. DRI/McGraw-Hill, Lexington, MA.