Recommendations for a Healthy Water Future

2021 UPDATE: — Recommendations for a Healthy Water Future
EXECUTIVE SUMMARY

Smart water management is paramount to allowing conservation and economic development to exist side by side. The Georgia Water Coalition supports implementation of proven sustainable solutions that meet the state’s water challenges while maintaining the integrity of Georgia’s natural systems, promoting public health, and equitably addressing the needs of individuals, municipalities, industries, agriculture, and businesses.

Over the past 18 years, the Coalition has grown to include over 275 member groups, encompassing conservation organizations, farms, homeowner and lake associations, businesses, sporting clubs, professional associations, and religious groups. The Coalition continues to speak out and to provide non-partisan, science-based information about the importance – even critical nature – of prudent statewide water management. The Coalition effort benefits all Georgians because it asks our leaders to make responsible decisions about how best to protect our finite water resources in a changing climate, now and in the future.

Every two years since 2002, the Georgia Water Coalition has published a report setting forth its principles and goals, with recommendations on how to establish clean and sustainable water resources in Georgia. This is the tenth such report of the Georgia Water Coalition. The 2021 report updates previous recommendations as needed and includes new recommendations related to emerging issues in the state.

Mission Statement of the Georgia Water Coalition

The Georgia Water Coalition’s mission is to protect and care for Georgia’s surface water and groundwater resources, which are essential for sustaining economic prosperity, providing clean and abundant drinking water, preserving diverse aquatic habitats for wildlife and recreation, strengthening property values, and protecting the quality of life for current and future generations.

The Principles Defining the Georgia Water Coalition’s Work

The members of the Georgia Water Coalition work collaboratively and transparently with each other to achieve specific goals based on the following principles.

A. Racism and other discriminatory biases are embedded in our society’s institutions. This bias influences public resources, such as community processes, priority setting, and resource allocation. Pollution and toxins disproportionately impact the health of marginalized communities, including but not limited to Black, Indigenous, people of color, immigrant, and lower wealth communities. In order to ensure that every Georgian has access to clean water, biases and inequities must be addressed, and all Georgians must have equal opportunity to a seat at the decision-making table.
B. The surface waters and groundwater of Georgia are public resources to be managed by the state in the public interest and in a sustainable manner to protect natural systems, meet human and economic needs, and account for the effects of climate change.

C. Effective water management requires ongoing, rigorous evaluation and planning that is:

a. transparent and informed by citizen input;
b. based on watersheds, river basins, and aquifers;
c. informed by the best available scientific data;
d. reliant on uniform, consistently applied, and enforceable standards; and
e. implemented, enforced, and timely revised as necessary.

D. Shared waters must be apportioned equitably among all users to meet reasonable needs and assure the long-term sustainability of the natural systems on which those water supplies depend.

E. Effective water management and allocation requires conservation as the primary management method. All Georgians must strive to become better water stewards for those living in a downstream area, adjacent state, or elsewhere in a given river basin.

**Overarching Goals**

With these principles in mind, the Georgia Water Coalition has developed the following overarching goals for a healthy water future in Georgia.

- Maintain water as a public resource, not a private commodity.
- Protect and restore healthy natural systems.
- Create, expand, and strengthen environmental justice measures that protect Georgians and their water resources in a just and equitable way.
- Provide future generations with a heritage of plentiful fresh water.
- Make clean water a statewide regulatory priority.
- Ensure that water conservation and efficiency comprise the cornerstone of water supply planning.
- Establish common-sense water management policies.

The remainder of this report presents specific recommendations, agreed upon by a consensus of Georgia Water Coalition members, which are crucial to achieving these goals. The Coalition urges the Governor, the General Assembly, the Board of Natural Resources, the Environmental Protection Division (EPD), the Coastal Resources Division (CRD), the Georgia Environmental Finance Authority (GEFA), other relevant state and federal agencies, regional water councils, local governments, water utilities, and all water users to adopt and implement these recommendations as appropriate. The Coalition stands ready to work in collaboration with these entities and water users and to engage in dialogue to find common goals and implement solutions.
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Cover Photo: Okefenokee Swamp  
Photo Credit: Joe Cook
Prevent over-allocation of Georgia’s surface waters and groundwater and protect natural instream flows.

Georgia’s current system of water withdrawal regulation is inadequate to ensure enough clean water remains in our rivers and aquifers. The over-allocation of surface waters and groundwater, combined with the effects of climate change, creates numerous negative impacts, such as low flows in surface waters, insufficient well water supplies, and saltwater intrusion in coastal aquifers. This mismanagement thereby deprives all water users in Georgia their reasonable use of the state’s water resources.

a. The state must reallocate overdeveloped surface waters and aquifers to be in line with the reasonable use doctrine, thereby restoring and protecting individual use rights and public benefits.

b. EPD should lower the water withdrawal permitting threshold to 10,000 gallons per day. The current permitting threshold of 100,000 gallons per day allows numerous users to have significant adverse effects on flow volumes while escaping any permitting requirements. Lowering the permitting threshold will also incentivize technologies that use less water and provide more accurate information on how water is being used.

c. The state should develop water budgets for all river basins. No water withdrawal permits should be issued, renewed, or modified unless and until the impacts on the water resource are known and the applicants have met specific water conservation and efficiency goals.

   EPD must prohibit the trading or sale of water withdrawal permits in order to properly account for how water is being allocated within each river basin and to prevent the establishment of water markets in Georgia.

d. The state should link water withdrawal permits to river conditions, particularly watershed, flow, and the most recent drought of record. Permittees must reduce water withdrawals during times of low flow.

e. The state should amend water withdrawal permits that consistently use less water than authorized by the original permit in order to keep water in streams, rivers, lakes, and aquifers and to provide for potential reallocation or other uses if resources allow.

f. Water withdrawal permits should not be issued or renewed unless they require the permittee to use the most water-efficient technologies feasible.
h. Georgia’s water withdrawal regulations must be amended to require agricultural use permit applicants to meet the same criteria for issuance, amendment, or denial as municipal and industrial water withdrawal permit applicants, including the requirement for water conservation plans. Water conservation plans must be incorporated into all water withdrawal permits as enforceable conditions.

i. EPD must require municipal, industrial, and agricultural water withdrawal permittees to report monthly the amount of water consumed (not returned to the original source) and withdrawn (returned to the original source) each day. EPD should make this data publicly available through its website and update that data on a monthly basis.

j. Municipalities and counties should allow development only where adequate water supplies (and assimilative wastewater capacity) exist and should incorporate these requirements into their comprehensive plans.

k. The state should monitor coastal aquifers for saltwater intrusion, determine whether and the extent to which that intrusion is due to over-allocation and mismanagement, and provide funding and resources to address that problem.

l. The state must adopt and implement a final instream flow policy that is science-based, protects instream needs, and accounts for natural seasonal flow patterns, including during drought conditions.

m. Until a final instream flow policy is adopted, the state must require site-specific instream flow studies for all new projects, including reservoirs that have the potential to alter natural downstream flow. The results of those studies should be used to establish flow requirements downstream of such projects and should be publicly available.

n. State and regional water plans should incorporate clear restoration goals for river and stream segments that experience low flows during average rainfall years, cease to flow during droughts due to over-allocation and mismanagement, or that flood during minor rainfall events. Distinct measures should be implemented to correct mismanagement and restore natural flows.

o. Existing permits for all reservoir releases should be reexamined to ensure that releases support healthy stream flows, particularly during drought.
Efficient water use and water conservation have positive impacts on the environment and on state and local economies. By reducing the demand for water and by increasing efficiency, we can keep more water in our rivers, lakes, and aquifers and avoid the harms caused by over-allocation and mismanagement.

a. The state should educate developers and builders, plumbing and mechanical design firms, water utilities, farmers, landscapers, and other groups on water efficiency and conservation and provide financial incentives for those water users to reduce water use and to invest in and include water efficiency measures in their work.

b. All Regional Water Council and Metro District water plans should include meaningful, aggressive, and enforceable water efficiency measures.

c. EPD should expand the 2015 “Water Efficiency Rules” to include comprehensive interim and permanent water conservation and efficiency requirements for all water use sectors, not just public water systems. These goals and benchmarks should have numerical targets and associated timelines to reach those targets. The rules should be enforceable and not just guidance from the state.

d. The Georgia Water Stewardship Act should be expanded to require water-efficient retrofits for existing homes, businesses, institutions, and not be limited to new development.

e. Municipalities should increase water efficiency and conservation by adopting standards more stringent than the Georgia Water Stewardship Act requires.

f. When planning for new development and redevelopment, municipalities should promote policies that maximize the return of water withdrawn back to the original watershed. Similarly, site design, landscaping, and maintenance decisions at the municipal level should be based on water efficiency goals, zoning, and impervious surface limits. Green infrastructure should be incorporated into site designs to better mimic natural water cycles.

g. State and local governments should promote no-water or low-water landscaping practices, particularly in times of drought, and emphasize the use of rainwater and condensate, rather than wells, for outdoor water use. All landscaping should be designed to reduce water consumption and increase infiltration.
h. County and municipal comprehensive plans must fully consider the impacts of development on water resources, including water supply and stormwater, and should require better analyses of cumulative impacts on water resources where appropriate.

i. The state should score water utilities based on national and state best conservation and efficiency practices, as well as withdrawal return rates. These scores should be published, and system improvement funds and new withdrawal requests should be linked to scores and progress towards reaching efficiency goals.

j. All water bills must plainly promote fairness, transparency, conservation, and simplicity to and for water users.

k. Water rates that promote the use of excess water for any reason must be eliminated. Instead, water rate structures should promote conservation and efficiency.

l. The state should provide incentives for municipal water utilities to reduce water loss below the national average.

m. Before investing in new public water supply systems, including water supply reservoirs, local governments must first maximize existing water supplies by using them more efficiently, aggressively managing the demand for water, and inspecting and repairing leaks to make existing systems more efficient.
The environmental consequences of dams, reservoirs, and IBTs are substantial and varied. Dams block fish migrations, trap sediments, and transform free-flowing river systems into artificial reservoirs. Changes in temperature, dissolved oxygen, and other physical and chemical properties of the water behind dams often result in lakes that are ill-suited for native plants and aquatic species. IBTs, by their nature, transfer water from one river basin to another, thereby depriving the original basin of much-needed water returns.

a. EPD should initiate the rulemaking on reservoir permitting that was outlined in the 2008 Comprehensive State-wide Water Management Plan, which would include a requirement for a full investigation of all reasonable water supply alternatives before a new water supply reservoir may be approved.

b. The state must recognize that private water supply reservoirs are contrary to the public resource doctrine and should deny permits for those reservoirs. Private water supply impoundments and large amenity lakes restrict stream flows and public access and result in monopolizing water resources to the detriment of downstream and recreating users.

c. Every proposed reservoir project in Georgia should be required to prepare a comprehensive Environmental Impact Statement under the National Environmental Policy Act, and not simply an Environmental Assessment, to evaluate the proposed project’s impact on the entire river basin.

d. The state should prohibit any new dams or barriers along Georgia’s free-flowing river and stream segments.

e. Dams and barriers should be removed or modified where feasible. If not feasible, the effects of those barriers should be minimized by adding fish passage for all species and eddies for sturgeon as appropriate.

f. Existing IBT regulations must be strengthened by making the State Water Plan criteria mandatory. The state should establish strict guidelines for grandfathering existing IBTs. Specifically, the volume, end use, percentage of consumptive use, basin of origin, and basin of receipt of all existing IBTs should be explicitly incorporated into the water withdrawal permits associated with those transfers upon the renewal of such permits.

g. The state should incorporate strategies into regional and statewide water plans for reversal of IBTs in those donor river and stream segments that are suffering from chronic low flows and move towards effectuating such reversals.
Georgia has experienced several historic droughts over the past two decades, and droughts are projected to become more frequent and severe as a result of climate change. To combat this, drought and water supply planning must become permanent, year-round activities for state and local governments.

a. Drought planning and management must be proactive, science-based, non-political, and focused on all sectors and users in order to protect surface water and groundwater resources.

b. Local governments should maintain the ability and discretion to implement stricter drought-related regulations and management practices than the state's regulations and practices to reflect local conditions.

c. State and local governments must update their drought management plans to be watershed focused, not driven by political boundaries or subjective triggers.

d. Drought planning should account for the effects of climate change, and climate modeling should be included in a comprehensive drought management plan.

e. The state must recognize that desalination, via current technology, is not a viable water supply alternative for Georgia during times of drought or to “drought-proof” the state. Desalination discourages conservation and efficiency, is extremely expensive, and requires the consumption of large amounts of energy and fresh water.
Eliminate or substantially minimize the adverse impacts of energy development, production, and transmission on Georgia’s waters.

Fossil fuel and nuclear power plants use significant amounts of water and negatively impact both water quality and air quality. Coal-fired power plants produce monumental volumes of coal ash, a toxic waste containing dangerous heavy metals. Drilling and fracking for oil and natural gas, both onshore and offshore, pose numerous risks to water resources. Pipelines carrying petroleum fuels and natural gas leak contaminants into waterways and groundwater and divide communities and natural landscapes.

a. Old, inefficient, dirty power plants in the state should be retired.

b. The state must consider and develop less water-intensive energy technologies, such as solar and wind, and transition away from permitting water-intensive fossil fuel and nuclear power plants. The state should require existing power plants to implement new technologies that use less water, such as dry-cooling technology.

c. The state should promote, incentivize, and require energy efficiency and measures to reduce energy demand for all electricity generators, electricity providers, and users.

d. All coal ash located in Georgia must be removed from unlined, leaking pits along waterways to dry, lined storage away from rivers and lakes and groundwater recharge areas. The producers of coal ash must pay for that removal and dry, lined storage and may not pass those costs along to rate payers or communities where the ash ultimately will be stored.

e. Coal ash may be moved to municipal solid waste landfills only if those landfills are properly designed, permitted, and maintained. If a landfill wishes to accept coal ash that comprises more than five percent of the daily tonnage intake, the landfill must apply to the state for a major permit modification.

f. The state must require much more stringent groundwater quality monitoring surrounding coal ash storage sites, whether the sites are lined landfills or drained and capped coal ash ponds. Likewise, the state must require more stringent surface water quality monitoring for surface waters that are adjacent to these coal ash storage sites. Monitoring must be comprehensive both in frequency and location.

g. All wastewater discharge permits for coal-fired power plants must be updated to include more stringent requirements for contaminants found in coal ash.

h. New or expanded pipelines with questionable need or with unacceptable impacts or risks to Georgia’s water resources must be prohibited.

i. Hydraulic fracturing, or fracking, should ultimately be banned in Georgia. Until then, fracking must be strictly regulated to minimize the risk of surface water and groundwater contamination; local governments must retain authority to impose their own safeguards concerning fracking as they see fit; and fracking must be prohibited in national forests, parks, wildlife areas, and other sensitive places.

j. The state should oppose offshore seismic testing, exploration, and drilling for oil and natural gas in order to protect coastal waters, marine species, and important economic and tourism interests.
Strengthen water quality protections for rivers, lakes, and streams.

Our rivers, lakes, and streams are not a commodity to be used, consumed, or polluted by the highest bidder. Georgia’s current safeguards for surface waters are insufficient to ensure that water quality is protected and restored.

a. Water pollution trading, also known as water quality trading or nutrient trading, should not be introduced in Georgia unless EPD has adequate staff, funding, and resources to ensure that water pollution trading improves water quality and that no “hot spots” of pollution will be created. These trading schemes allow regulated entities to buy pollution credits instead of reducing point source or non-point source pollution at their own locations. Water pollution trading, if eventually allowed, must never be used to justify trading schemes for water withdrawal permits in Georgia.

b. EPD and the Board of Natural Resources must strengthen water quality standards for all waters of the state by adapting them to reflect the actual uses of the waters and the diversity of water resources in Georgia. EPD must strengthen its water quality standards during the next triennial review process, if not sooner.

c. The state should actively promote and encourage public participation in the triennial review process, and the Board of Natural Resources must consider and timely act on the public’s recommendations to improve water quality standards and to change designated uses of certain waterways. GWC members should actively participate in this process. Critically, EPD and the Board must change the designated use of a state water when it can be demonstrated that a different designated use would reflect the actual and existing uses of that water.

d. The General Assembly must restore and strengthen the statutory requirement for naturally vegetated buffers adjacent to all of Georgia’s state waters, including small streams, freshwater wetlands, coastal marshlands, floodplains, and reservoirs.

e. The state must substantially improve its enforcement of naturally vegetated buffers to protect water quality and to demonstrate that the values of buffer functions are significant and science-based. In addition, the state must enforce buffer regulations uniformly and limit the granting of variances.

f. State and local governments should develop comprehensive plans for headwaters protections, which should include requiring vigorous enforcement of the Erosion and Sedimentation Control Act, preventing segmentation of protected stream reaches, and coordinating with neighboring states to protect headwater reaches that impact Georgia.

g. The state should prohibit the location of any municipal solid waste disposal facility, coal combustion residual landfill, mine, fossil fuel pipeline, compressor station, gas liquefaction or storage facility, or other industrial facilities capable of having significant adverse effects on water quality or quantity, within a certain distance of that part of a blackwater river or swamp which flows through the coastal plain within the borders of this state.
THE RECOMMENDATIONS FOR A HEALTHY WATER FUTURE

Reduce the adverse effects on water resources from septic systems, land application systems (LASs), concentrated animal feeding operations (CAFOs), and sludge.

Septic systems, LASs, CAFOs, and sludge disposal all pose pervasive threats to water quality around the state. When not properly sited or maintained, septic systems can contaminate surface water and groundwater resources, leading to public health problems. LASs do not function as intended, and wastewater from these systems runs off into adjacent surface waters or enters groundwater. CAFOs pose numerous problems from the spraying and storing of animal waste near water resources. Likewise, when sludge is improperly land applied, it can impair surface waters.

a. The state should regulate the siting and operation of septic systems and all types of LASs as appropriate, in a transparent manner that is communicated to the public, to improve water returns and curb contamination of surface waters and groundwater.

b. In areas where septic systems are the most appropriate waste management tool, they should be sited properly, maintained, and cleaned regularly to remain functional and to protect water quality. Regulations must include minimum pump-out schedules and plans for progressive elimination of septic systems if natural systems become overburdened. State and local governments must educate citizens on proper septic system maintenance.

c. Where feasible and appropriate, septic systems and municipal LASs should be converted to sewered systems. Policies to promote and incentivize such conversions should be developed and implemented, including giving local governments control and responsibility for water impacts and to discourage sprawl.

d. EPD, the Department of Public Health, and local boards of public health should conduct aggressive studies of the location and use of septic systems and municipal LASs throughout the state. These systems should be monitored stringently for violations, spills, and leaks into water resources.

e. Georgia should revise its regulations on LASs to focus on quantitative results and enforcement to produce successful outcomes. All LASs, whether municipal, industrial, or agricultural, do not function as intended and consume more water than is returned to the source.

f. EPD must ensure that all animal feeding operations, and CAFOs in particular, are properly permitted, monitored, and closed to prevent large quantities of animal waste from polluting our state’s water resources. In addition, permits for CAFOs should include requirements for public signage, adjacent surface water quality monitoring (if applicable), and groundwater quality monitoring.

g. Sludge from wastewater treatment plants, as well as fats, oils, greases, or animal parts generated by food processors, must be disposed of properly away from state waters. The land application of sludge classified as a fertilizer or a soil amendment must be strictly monitored and regulated by the Georgia Department of Agriculture to ensure no runoff into surface waters or contamination of nearby drinking water wells.
Many of Georgia’s underground water supplies are pristine and provide the public with water for numerous purposes. But Georgia’s current laws and regulations do not adequately protect groundwater resources, including aquifers, significant recharge areas, and concentrated recharge areas.

a. EPD must strengthen and enforce existing rules related to groundwater quality to protect Georgia’s groundwater from pollution.

b. The state must explicitly prohibit groundwater pollution and require polluters to restore and remediate contaminated groundwater resources.

c. The state should expand its monitoring and assessment of groundwater resources, including comprehensively mapping all recharge areas, and increase understanding of the relationship between groundwater and surface water.

d. The state should increase protections for private drinking water wells, such as requiring more robust groundwater monitoring at adjacent agriculture operations and industrial operations for pesticides, fertilizers, and other pollutants.

e. Prohibit aquifer storage and recovery (ASR) in Georgia. ASR requires injecting water from a river, lake, or aquifer into a separate aquifer for later use. These projects are often proposed as a means to protect against future drought, but the risks of contaminating the “storage” aquifer and unfounded assertions of property rights outweigh any benefits.

Photo Credit: Joe Cook
THE RECOMMENDATIONS FOR A HEALTHY WATER FUTURE

9 Strengthen environmental protections for coastal waters and wetlands.

Georgia’s unique coastal salt marsh ecosystem, tidal creeks, and wetlands provide nurseries for commercially and recreationally valued species of fish, shellfish, and other wildlife; provide an important buffer against storms, flooding, and erosion; filter and break down pollutants; and provide a recreational resource that is vitally linked to the state’s economy. Protection of Georgia’s coastal waters and wetlands is particularly important in light of climate change, drought, sea level rise, hurricanes, and other threats. Freshwater wetlands recharge aquifers, improve water quality, provide flood control, and serve as wildlife habitat.

a. The state should improve safeguards for Georgia’s salt marsh ecosystem by limiting activities that affect the marsh, such as the construction of long docks and bulkheads.

b. Where feasible, the state should require natural techniques to reduce erosion and protect shorelines, such as living shorelines, as opposed to unnatural hardened structures like bulkheads and seawalls.

c. When deciding whether to permit certain activities in coastal wetlands, the state should consider wetlands’ functions, stormwater management, and other activities adjacent to and up-gradient from the marsh. This analysis should include freshwater instream flow considerations that are supportive of salt marsh structure and function, and also the immense and important areas of fresh tidal and brackish marsh and tidal hardwood swamps that are not covered by the state’s Coastal Marshlands Protection Act.

d. The state should ensure the protection of freshwater wetlands and require the restoration of degraded wetlands.

e. The U.S. Army Corps of Engineers must include meaningful wetland mitigation requirements in Section 404 permits for projects that impact wetlands. In addition, the Corps must enforce those mitigation requirements, and all records of inspections must
10 Improve government enforcement, monitoring, funding, and transparency to ensure water resources and drinking water are protected and accessible and the public’s voice is heard.

The General Assembly, Board of Natural Resources, EPD, CRD, and other state agencies should ensure that Georgia residents have clean and safe water for all uses. To do so, they must have the power and funding to enforce our laws and regulations, obtain data and information, and consider and respond fully to citizen concerns.

a. State and local governments should increase and improve enforcement of all permits and regulations related to water withdrawals, point source pollution, stormwater control, and erosion and sedimentation, using effective legal actions such as stop work orders and administrative orders.

b. The state should decline to renew water-related permits to permittees that are not in compliance with the current permit unless a conditional renewed permit contains a specific, enforceable plan to bring the permittee into compliance within the shortest practicable time period.

c. The state should protect water quality through expanded state-level monitoring of rivers, lakes, and streams that is comprehensive both in frequency of monitoring and the number of monitoring sites. All state-level data must be published in print and online for the public.

d. On water quality issues affecting public health, the state must warn the public and make monitoring data promptly available in print, online, and at places where the public regularly use state waters or seeks information about state waters. The state also must immediately inform local emergency responders and public health officials about water quality issues affecting public health, such as adverse effects from contacting or drinking the water or eating fish or shellfish caught in the area.

e. The state should provide training to state and local emergency responders and public health officials about water quality threats, how to respond to those threats, and how to notify the public to ensure a robust emergency response and to protect public health and safety.

f. EPD should make publicly available all official notices of spills, sewer overflows, releases, and other pollution reports immediately upon receipt by publishing them in an easy-to-find and comprehensive database.

g. Where a public drinking water supply becomes contaminated with lead, arsenic, or other pollutants, the state and local government must report the contamination to all users and provide funding for infrastructure or other changes to understand and remediate the contamination.
h. The state should supplement its own monitoring data with monitoring information collected by citizens, businesses, and federal agencies, such as USGS, and should use that supplemental information to alert it of potential water quality or permit violations.

i. The General Assembly must adequately fund EPD, CRD, and other state agencies to fulfill their permitting, monitoring, and enforcement missions. The state must take advantage of all federal funding opportunities for water quality and instream flow protections.

j. EPD and CRD should publish all water-related permit applications and public comments online as they are received. These agencies must consider the public’s recommendations before deciding whether to issue, renew, or modify a permit. State agencies should also publish all permitting and regulatory decisions online as soon as they are issued.

k. The state must maintain citizens’ rights to effective notice, administrative review, and judicial review of all permit decisions and other water policy decisions. “Effective notice” means that citizens are given meaningful and timely opportunities to review and provide comments on all permitting and rulemaking decisions before those decisions are made final.

l. All Georgians and visitors to the state should have opportunities to enjoy recreation on and around Georgia’s waters. The state should create new opportunities for public enjoyment of state waters, such as establishing and funding a statewide water trail system. The state should protect opportunities for public access to outdoor recreation. The state must ensure that outdoor recreation opportunities are available to and inclusive of everyone, free from discrimination, intimidation, and harassment.

m. State environmental permitting needs to consider cumulative impacts. State permitting and siting decisions for any projects that could impact water quality, quantity, or access should take into account all environmental and community/demographic factors including cumulative health and ecological impacts resulting from multiple existing and legacy pollutants, projects, industries, land uses, etc. in the proposed project’s vicinity.

n. Consistent with Georgia’s philosophy for local home rule, local governments should maintain the ability and discretion to implement stricter environmental regulations and ordinances to protect their water resources and public health within their jurisdictions.

o. The state should provide funding for, through EPD or other channels, and develop maximum contaminant levels, adopt monitoring and screening standards, and sample for Per- and Polyfluoroalkyl Substances (PFAS) in waterways, animals, groundwater, drinking water wells, soil, milk, and landfill leachate near known actual and potential sources of PFAS contamination. The state should also urge the U.S. Department of Defense to allocate funds to and for its current and former facilities and direct them to do such testing, and, where bad results are found, to follow up with amelioration such as new wells, filters, or other water supplies. The state should legislate and fund protections of workers with PFAS, such as firefighters or military personnel.
APPENDIX A: GWC MEMBERS

AGgrow Tech
Albany Georgia Audubon Society
Altamaha Riverkeeper
Alternative Energy Southeast
American Cane Society
American Fisheries Society - Georgia Chapter
American Rivers
Amy’s Green Cleaning
Anthony Shoals Preservation Group
Apalachicola Riverkeeper
April Ingle Consulting Association Management Services
Athens Land Trust
Atlanta Coyote Project
Atlanta Water Gardens, Inc.
Atlanta Whitewater Club
Bee Natural, Inc.
Berkeley Lake Homeowners Association
Bike Athens
Blue Heron Nature Preserve
Broad River Outpost
Broad River Watershed Association
BSA Troop 1134
Burnt Fork Watershed Alliance
Camden County Land Trust
Captain Stan’s Smokehouse
CCR Environmental
Cedar Creek RV and Outdoor Center
Center for a Sustainable Coast
Central Savannah River Land Trust
Chattahoochee Nature Center
Chattahoochee Parks Conservancy
Chattahoochee Riverkeeper
Chattahoochee River Conservancy
Chattooga Conservancy
Cherokee Transitions Green
Citizens for Clean Air and Water
Citizens for Environmental Justice
City of Porterdale
Clean Coast
Clear Rivers Chorus
Coastal Georgia Travel
Cochran Mill Nature Center
Compassion in World Farming
Concerned Citizens Against Residential Gun Ranges
Concerned Neighbors of Wayne County
Conserve America
Coosa River Basin Initiative
Creative Earth
Creative Mischief
Creative Solar USA, Inc.
Deep South Cherokee Keetoowah Foundation
DeKalb County Soil & Water Cons. District
Dogwood Alliance
Dunham Farms
Dr. Whyte Pediatrics
Earthkeepers & Company
Earth Equity Advisors
Earth Ministry, NW Unitarian Universalist Congregation of Atlanta
Environment Georgia
Environmental Community Action, Inc.
Environmental Defense Fund - SE Region
Ewing Irrigation - Covington
ezClearWater.com
Fall-line Alliance for a Clean Environment
Fall Line South Field Institute
Fayette Adopt-a-Stream
Fishsport
Flint Riverkeeper
Forest Stewards Guild
Fox Environmental
Friendly Human
Friends of Barber Creek
Friends of Georgia, Inc
Friends of McIntosh Reserve
Friends of the Apalachee
Friends of the Savannah River Basin
Friends of South Newport River
Garden Club of Georgia, Inc.
Laurel District
Cumming Garden Club
Druid Hills Garden Club
Jonquil Garden Club
Richmond Hill Garden Club
Garden*Hood
Georgia Audubon Society
Georgia Bass Chapter Federation
Georgia Canoeing Association, Inc.
Georgia Clinicians for Climate Action
Georgia Coalition for the People’s Agenda
Georgia Coalition of Black Women
Georgia Conservation Voters
Georgia for the Planet
Georgia Forest Watch
Georgia Hemp Economic Revival Organization
Georgia Interfaith Power and Light
Georgia Kayak Fishing
Georgia Lakes Society
Georgia Land Trust & Alabama Land Trust
Georgia Onsite Wastewater Association
Georgia Organics
Georgia Poultry Justice Alliance
GeorgiaRiverFishing.com
Georgia River Network
Georgia River Survey
Georgia Rural Urban Summit
Georgia Watch
Georgia Wildlife Federation
Georgia Women (And Those Who Stand With Us)
Georgia’s Women’s Action For New Direction (GA WAND)
GigaWord
Gilmer County Water Trails
Global Elite Properties, LLC
Glynn Environmental Coalition
Graci’s Garden Center
Greater Apalachee River Community
Greening Forward
GreenLaw
GreenMark Consulting, LLC
The Rain Barrel Depot
The Rain Saver
The River Line Historic Area
The Victor Firm, LLC
The Wilderness Society
Tredeau Design
Trout Unlimited - Georgia Council
Turner Environmental Law Clinic
Unicoi Outfitters
United Nations Association – Atlanta
Upper Etowah River Alliance
Upper Oconee Watershed Network
Upper Tallapoosa Watershed Group
U.S. Green Building Council, GA Chapter
Watershed Alliance of Sandy Springs
WaterSmart Software
Water is Life West GA
Water Protectors
Watershed Sustainability
Wayne Morgan Artistry
West Atlanta Watershed Alliance
West Point Lake Advisory Council
West Point Lake Coalition
Westbrook Supply Co.
White Oak Hills Neighborhood Association
Women Advocating for Georgians (WAGs)
Woodbine Woman’s Club
WWALS-Suwannee Riverkeeper
Yellow Bluff Plantation
Yellow River Water Trail
APPENDIX B: LEADERSHIP TEAM

The 15 members of the Leadership Team include:

Altamaha Riverkeeper (2016)

Chattahoochee Riverkeeper (founding member- 2002)


Environment Georgia (2007)

Flint Riverkeeper (2009)

Garden Club of Georgia (2014)

Georgia Conservation Voters (2021)

Georgia River Network (2007)

Georgia Wildlife Federation (founding member- 2002)

Ogeechee Riverkeeper (2003)

One Hundred Miles (2014)

Satilla Riverkeeper (2014)

Savannah Riverkeeper (2013)

Sierra Club (2006)

Southern Environmental Law Center (founding member - 2002)
APPENDIX C: RIVER BASINS OF GEORGIA
APPENDIX D:
ADDITIONAL RESOURCES:
LINKS TO RELEVANT REPORTS
AND DOCUMENTARIES

Alliance for Water Efficiency resource library.


American Rivers and the Meridian Institute, Building a Community of Practice at the Intersection of Water, Climate Resilience and Equity (2018).


Chattahoochee Riverkeeper, Filling the Gap: Conservation Successes and Opportunities for Communities that Depend on the Chattahoochee River (2019).

Congressional Research Service reports. The official research arm of the U.S. Congress.


Environmental Integrity Project and EarthJustice, Georgia At A Crossroads: A Report on Groundwater Contamination from Coal Ash Threatens the Peach State (2018).


Georgia Climate Project: What does a changing climate mean for Georgia? What can we do about it?

Georgia Conservation Voters and Environment Georgia, 2019-2020 Georgia Environmental Scorecard.

Georgia Environmental Protection Division, Regional Water Plans.

Georgia Water Coalition, Clean 13 Reports (2017-2020) and YouTube Channel.

Georgia Water Coalition, Dirty Dozen Reports (2011-2020).


