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Name	Date	Status	Notes	Comment		
Larry Hanson	6/21/2011	Posted		The City of Valdosta would first like to commend the Georgia Environmental Protection Division (EPD), Suwannee-Satilla Council, and all others involved for their efforts throughout the regional water planning process. Each plan is specific to its region's water supply and needs, while also encompassing the intent of the Georgia Comprehensive Statewide Water Management Plan. Through the available data, reasonable recommendations have been identified for water supply, wastewater, conservation and stormwater. The recommendations reflect specifically our water sources, the agricultural, industrial, and municipal users, and recognizes the implementation needs of technical support, guidance, and funding.		
				While a tremendous amount of data is available for the Suwannee-Satilla, there are areas that need attention and continued studies, including the regional management of stormwater. In early 2009, 46 counties in South Georgia were declared disaster areas as the result of flooding. The City of Valdosta was greatly impacted by this event as a result of being located on the downstream end of where the Withlacoochee River and Little River sub-watersheds join together. Valdosta contributes only approximately 1% to the total 1,450 square miles that drain into these watersheds, so without regional coordination our local efforts cannot solve the massive stormwater issue we inherit, and certainly we cannot prevent another event of the 2009 magnitude without state assistance, funding and regional support.		
				Based on the EPD website, there are 105 cities and 39 counties that are permitted by the State through the Phase I or II programs. These federal regulations have helped to implement stormwater measures across the state; however, every community is impacted by stormwater and a large number of communities in Georgia are not taking appropriate measures to address the long-term impacts. By implementing a regional approach, this would help to streamline stormwater management through consistent control measures, regulations, and provide a more cost-effective approach. Through the proper evaluation, a series of storage areas could be identified to control stormwater flows, while providing additional benefits such as water quality, water quantity, and additional water supply. To implement such measures, the coordination between local, state and federal organizations is critical.		
				In addition, a regional task force or sub-committee should be formed, to continue the work of the Suwannee-Satilla Council, while representing all stakeholders and providing a formal planning mechanism to address the regional stormwater issues. Such a planning effort presents a unique opportunity to address multiple concerns as identified in the proposed regional water plan. For example, by seeking the opportunity to merge regional needs associated to agriculture, drought, and low flow with a regional challenge such as stormwater, the two issues can be addressed simultaneously and provide environmentally responsible solutions that best utilize our precious resources.		
				The Suwannee-Satilla plan specifically recognizes the drought and low flow conditions experienced throughout the state and particularly in this area where agriculture is so important to the economy. Dramatic decreases in the average water depth of rivers has occurred based upon measurements from 1965 and 2000 as compared to present measurements. According to Brian McCallum, Assistant Director of the U.S. Geological Survey, the river data measured on June 17, 2011, shows all the waterways in South Georgia are at record lows and becoming more severe. In areas of South Georgia the normal rainfall should be 25 inches; however is currently at 16 inches. The U.S. Department of Agriculture (USDA) completed a recent survey and determined that as of June 12th, 42% of the state's corn crop was poor o very poor, 46% of the state's cotton crop was poor or very poor, and 73% of the state's pastures and ranges were poor or very poor. As a result, Governor Deal has requested the USDA to declare 22 counties agricultural disaster areas.		
				By considering a number of practices, including the use of regional reservoirs, stormwater can be captured, stored, and utilized to address surface water gaps. While the benefits can include irrigation purposes, drought relief, and low flow conditions in streams, it is important to carefully evaluate the placement of such reservoirs so that environmentally sensitive areas are not lost and other negative adverse impacts are created. It is our position that addressing the regional needs collectively is sound science, public policy, and efficient use of resources. We commend the efforts put forth through the 2011 Water Reservoir Act and believe the associated funding for reservoirs should look beyond the needs of metro Atlanta and that projects in south Georgia should have equal priority and commitment.		
				The City of Valdosta is committed to seeking viable solutions so that our water resources are protected and managed, while providing the highest quality service to our community for generations.		