



May 26, 2006

Dr. Carol A. Couch
Director, Georgia Environmental Protection Division
Chairperson, The Water Council
2 Martin Luther King Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334

Dear Dr. Couch:

As you know, the Georgia Industry Environmental Coalition (GIEC) is a consensus-based technical organization representing a diverse group of industries throughout the State of Georgia. We have been following closely the work of the State-wide Water Planning Process and have member company representatives participating on the Basin Advisory Committees (BACs) and the State Advisory Committee and GIEC's Technical Advisor is a member of the Target Flow Regimes Technical Advisory Committee.

We have recently reviewed the EPD-commissioned research document from the Carl Vinson Institute of Government (Vinson Institute) entitled *Balancing Instream and Offstream Uses: Instream Flows, Surface Storage and Aquifer Management*. It is our understanding that EPD intends to use this document as the basis for its next discussion packet that will be distributed to the BACs.

Based on our review, we are writing this letter to express why we strongly believe the Vinson Institute document should not be used as the primary or sole source of information for the next set of BAC meetings. It appears the Vinson Institute has produced an advocacy document that lacks the balance and policy options needed to move the process forward toward sound water planning.

We believe there are at least two imperatives driving the water planning process and the Vinson Institute document is extensive in outlining just one of these imperatives: to protect the ecosystems of the State. However, the other imperative is to assure safe clean water supplies to meet all the needs of the State in the future. One can see this in the 2004 Comprehensive State-wide Water Management Planning Act, which contains the following vision:

"Georgia manages water resources in a sustainable manner to support the state's economy, to protect public health, and natural systems, and to enhance the quality of life for all citizens." OCGA 12-5-522(a)

The Vinson Institute's overriding emphasis on ecosystems falls short of the Act's comprehensive vision.

During the drought of 2001, the public evidenced communities experiencing water shortages due to low stream flows and empty storage reservoirs. However, the Vinson Institute's document does not outline policies adequate to address these compelling supply needs, which will quickly reappear in the next drought. The

Letter to Dr. Couch
May 26, 2006
Page 2 of 2

document advocates against important policy options such as inter-basin transfers and new reservoirs while at the same time advocating for maintaining natural stream flows. The strong advocacy position of the Vinson Institute's document seems to largely rely on conservation and demand reduction to meet our growing future needs. GIEC does not think enough groundwork has been laid factually or scientifically to support this conclusion. GIEC believes the vision of the General Assembly requires a more balanced and flexible approach in order to meet all our future water supply needs and protect our environment.

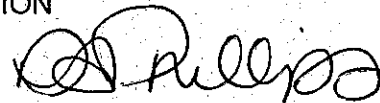
We urge you to seek a neutral and more data-driven presentation of all options and to reconsider the Vinson Institute's document as a primary or sole source of policy options to present to the BACs. We continue to seek the opportunity for further dialogue and hope that you will meet with us soon to discuss our comments in further detail.

Best regards,

GEORGIA INDUSTRY ENVIRONMENTAL COALITION



A. Katie Kirkpatrick, P.E.
Chair, Board of Directors



Deborah A. Phillips
Executive Director