
FINAL

Forsyth County Watershed Protection Plan

Prepared for
Forsyth County Water and Sewer Department

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Executive Summary

Forsyth County has experienced increasingly rapid growth over the last decade, which has changed watershed characteristics and increased demands on natural resources. In response to this growth, the County developed the Community Watershed Assessment and Management Plan (WAMP) in 2000 in conjunction with neighboring jurisdictions in the same watersheds (that is, Hall County and the City of Gainesville). The WAMP included an assessment of current watershed conditions and has been the foundation for watershed management and protection strategies for the County. Since the 2000 WAMP was developed, additional guidance was set forth from the Metropolitan North Georgia Water Planning District (District) in 2003 and the Georgia Environmental Protection Division (GAEPD) in 2005. This Watershed Protection Plan (WPP) is structured to comply with regulatory guidance and to provide comprehensive documentation of Forsyth County's existing and planned strategies for water quality maintenance and improvement.

Ultimately, recommendations for watershed protection in this plan will be incorporated into surface water withdrawal and wastewater discharge permits issued by the GAEPD. GAEPD guidance indicates that municipalities are required to integrate the District's watershed-specific protection plans and requirements directly into NPDES permits, while at the same time, linking compliance among water supply, wastewater, and stormwater permits. The GAEPD has indicated that failure to implement an effective watershed protection program will result in violation of the permit and/or denial of authorization for future permit requests.

The purpose of this WPP is to (1) summarize the existing and proposed programs that will be used to reduce nonpoint source runoff and improve water quality and aquatic integrity, and (2) describe current and future point source management strategies. Forsyth County's WPP includes a suite of activities to be implemented over time by multiple departments. The WPP is a living document based on an adaptive management approach that allows time to evaluate options and make optimal decisions on allocation of limited resources to achieve desired results.

Since the 2000 WAMP was completed, Forsyth County has performed a number of watershed-related activities including:

- Adopting more protective ordinances based on District models
- Developing a comprehensive land use plan
- Strengthening development reviews
- Instituting a Stormwater Management Program and adopting the Georgia Stormwater Management Manual (GSMM)
- Budgeting for watershed management and protection activities
- Developing and maintaining a schedule for implementation of watershed management and protection activities
- Identifying structural and non-structural best management practices (BMPs) to promote water quality

- Developing and implementing an environmental monitoring program that includes 303(d)-listed streams
- Participating in the Etowah Habitat Conservation Plan
- Following implementation plans for 303(d)-listed streams
- Submitting to GAEPD and the District annual reports that measure progress toward improving and maintaining watershed health

These activities and recommendations for future implementation are described in this document. The GAEPD has stated that implementation of the WPP will be coupled with regulatory permits for water and wastewater facilities. In cases where a degradation trend is identified, permit holders must modify the plan to address causes of the degradation. Permit holders will need to document that they have made meaningful progress in protecting water quality, as described in the guidance provided by GAEPD in March 2005.

Watershed Protection Plan

Introduction

This document, known as a Watershed Protection Plan (WPP), consolidates Forsyth County's watershed protection and stormwater management efforts. This WPP also updates information from the Watershed Management Plan, which was Chapter 7 of the original Community Watershed Assessment and Management Plan (WAMP), completed in 2000 as part of a multi-jurisdictional effort with the City of Gainesville and Hall County. The WPP is based on data and analysis from the County's Watershed Assessment (also part of the WAMP from 2000) and subsequent monitoring efforts, as well as recent regulatory guidelines. The main components of the WPP involve defining the problems within the watersheds and developing flexible, practicable solutions to the problems, based on the guidance from the Georgia Environmental Protection Division (GAEPD) and the Metropolitan North Georgia Water Planning District (District). The ultimate goal of the WPP is to develop a framework for a long-term program to protect and improve the County's watersheds, as well as restore streams to their designated uses. Through this integrated protection plan, specific actions and schedules are detailed to protect property, accommodate responsible development, and conserve and restore the ecosystems.

Ultimately, recommendations for watershed protection in this WPP will be incorporated into surface water withdrawal and wastewater discharge permits issued by the GAEPD. The GAEPD has indicated that failure to implement an effective watershed protection program will result in violation of the permit and/or denial of no authorization for future permit requests. Therefore, the County is developing programs that can be implemented in a timely manner and will provide measurable improvements in water quality. An adaptive management approach will continue to be taken in managing Forsyth County's water resources to integrate new requirements, while also balancing the County's limited financial resources.

Purpose and Approach

The purpose of this WPP is to (1) summarize the existing and proposed programs that will be used to reduce nonpoint source runoff and improve water quality and aquatic integrity, and (2) describe current and future point source management strategies. In addition, an approach is outlined for implementation of long-term monitoring of the overall watershed protection program and execution and funding of activities. This WPP will serve as the County's blueprint for protecting water quality and aquatic integrity. Revisions to this document will be included in an annual report submitted by the County to GAEPD and in annual reporting to the District.

The overall approach to watershed protection is designed to address the issues identified during the watershed assessment and impacts associated with anticipated changes in land use as the County continues to develop. Recommendations are focused on programs, policies, and protection actions that are most likely to improve water quality and aquatic integrity. When managed appropriately, these improvements do not have to detract from a

community's ability to accommodate continued growth. On the contrary, numerous metropolitan areas in the US have found that such improvements actually boost their "quality of life" image, and thus attract more residents and business interests who see value in maintaining a creative balance between continued growth and environmental stewardship.

Watershed Protection Plan Components

The original WAMP was organized around three major components (community-wide strategies for improving watersheds, new development requirements, and improving impacted areas). However, additional guidance from GAEPD has triggered a change in the organization of the WPP to reflect the most recent State and regional regulations. As a result, the main components of the WPP involve: (1) describing responsible legal authorities and funding sources for watershed protection and management, (2) identifying pollutant sources and monitoring water quality, and (3) developing feasible solutions to watershed problems while using the guidance from the GAEPD. The components described in the original WAMP from 2000 are still relevant to Forsyth County's watershed and stormwater activities, and this document is organized to provide information to update the original WAMP.

Regulatory Drivers

The regulatory guidelines that have driven the organization and content of this document include: (1) GAEPD Watershed Assessment and Protection Plan Guidance (GAEPD, 2005), (2) the District's Watershed Management Plan (District-wide WMP, CH2M HILL, 2003), and (3) other new guidelines from the District, such as model ordinances for stormwater, floodplain management, erosion control, conservation subdivisions, litter control, and stream buffers. The County has already implemented changes to comply with GAEPD and District regulations and guidance. For example, the County has revised its local ordinances to follow these guidelines and to enforce best management practices (BMPs) that protect and improve water quality.

As outlined by GAEPD (2005), watershed assessments are an integral part of the permitting process for new National Pollutant Discharge Elimination System (NPDES) wastewater permits. As part of the watershed assessment, the State requires the applicant to characterize the watershed, assess the water quality impacts from future development, and develop a protection plan to control water quality impacts. Regulatory guidance clearly states that "the owner will develop a control strategy to reduce the nonpoint source impacts of secondary development in the area." When GAEPD issues a new or expanded discharge permit, the applicant is expected to implement the strategies developed in the WPP according to a schedule included in the permit.

Due to its location within the District, Forsyth County is required to implement the recommendations (or equivalent) in the District-wide WMP (CH2M HILL, 2003). While the original WAMP includes recommendations similar to most of the recommendations in the District's plan, some updates regarding compliance activities are included in this WPP to fully meet the intent of the District-wide watershed management recommendations. The District has also developed model ordinances to promote watershed management and protection throughout the metropolitan Atlanta area. Forsyth County has met the intent of

all model ordinances, and continues to update ordinances based on revisions from the District. Ordinances are described in further detail in under “Legal Authority.”

Phase I of the United States Environmental Protection Agency (USEPA) Stormwater Program was promulgated in 1990 under the Clean Water Act (CWA). Phase I relies on the NPDES permit coverage to address stormwater runoff from: (1) medium and large municipal separate storm sewer systems (MS4s) that generally serve populations of 100,000 or greater, (2) construction activities disturbing 5 acres of land or greater, and (3) 11 categories of industrial activities. In 1999, USEPA published the Stormwater Phase II Final Rule, which expands the Phase I program by requiring operators of small MS4s and operators of small construction sites (1 to 5 acres) to be covered by NPDES permits and to implement programs and practices to control polluted stormwater runoff. Forsyth County is included under the MS4 program as a Phase I community, and as such, will be required to implement the requirements for stormwater management found in the County’s Stormwater Management Program (SWMP), approved by GAEPD in the fall of 2005.

There are significant overlaps between the WPP for the County’s NPDES discharge permits, the District-wide WMP, and the MS4 Phase I requirements. This WPP sets forth the overall strategy Forsyth County will use to meet these various requirements.

Reporting Requirements

A report and certification of WPP implementation will be prepared each year and submitted to GAEPD and the District. This report will summarize all the data collected during the year and will interpret results concerning progress and any revisions to the WPP. The annual report will also include both hard copy and electronic versions of the water quality data, and biological data, if appropriate, for use by GAEPD. These data will be submitted in Microsoft Excel. Internal reports summarizing the condition of streams sampled for both the long-term and the short-term water quality monitoring will be prepared quarterly. This frequency will promote continuous review of the data and help to identify trends in water quality that may be of concern.

Legal Authority

The following sections describe those entities with watershed protection responsibilities in the Lake Lanier and the Upper Metro Chattahoochee and Upper Coosa River Basins, based on political jurisdiction and/or NPDES permit responsibilities. Legal authority for watershed protection in Georgia is generally related to political jurisdiction or an NPDES permit. In Georgia, as a home rule state, local governments maintain authority over all land use and zoning decisions within their jurisdiction and, as a result, have a significant influence on nonpoint source pollution and stormwater management. These political jurisdictions are typically the holders of the NPDES stormwater permits. Municipal point sources, such as Forsyth County’s Fowler Water Reclamation Facility (WRF), are also regulated through the NPDES permitting system and have an associated service area for which the County is responsible.

Political jurisdictions, watershed boundaries, and service areas do not necessarily coincide, which generally makes stormwater and watershed management activities a challenge to

plan, fund, and implement. To ensure that watershed protection activities are implemented, GAEPD has provided guidance indicating that it will require integration of the District’s recommendations on watershed-specific protection plans and requirements directly into an entity’s NPDES permits, while at the same time linking compliance among water supply, wastewater, and stormwater permits.

Political Jurisdictions within Forsyth County Watersheds

In order to effectively implement watershed protection strategies, it is important to identify the responsible parties for the entire watershed. The following sections review the jurisdictions and other responsible parties that occur within the same watersheds as Forsyth County, including incorporated areas within the County and areas upstream or downstream of the County, as well as watershed protection groups. Contact information for responsible parties is located in Appendix A.

Surrounding Political Jurisdictions

Forsyth County is located in two major river basins (see Figure 1), known as the Alabama – Coosa – Tallapoosa (ACT) and the Apalachicola – Chattahoochee – Flint (ACF), both of which ultimately drain to the Gulf of Mexico. The northwestern corner of the County, representing approximately 30 percent of total area, drains to the Etowah or Little River in the Coosa River Basin, while the rest of the County is in the Chattahoochee River Basin, draining either to Lake Lanier or to the river (see Table 1).

TABLE 1
Distribution of the County across Major Watersheds
Forsyth County Watershed Protection Plan

Major Watershed	Acres	Square Miles	Percent of County
ACT River Basin			
Etowah River	44,358	69.3	28 %
Little River	1,732	2.7	1 %
ACF River Basin			
Lake Lanier	53,361	83.4	34 %
Upper Metro Chattahoochee River	58,594	91.6	37 %
Upper Chattahoochee River	180	0.3	0 %
Forsyth County Total	158,225	247.2	100 %

Note: Table includes the City of Cumming

Table 2 and Figure 1 illustrate Forsyth County’s contribution, relative to its neighbors, to the major watersheds in which it is located. The County is responsible for less than 1 percent of the Upper Chattahoochee watershed, upstream of Lake Lanier. However, the County is responsible for 42 percent of the tributary area draining directly to Lake Lanier. Hall County also represents a large portion of the Lake Lanier watershed (44 percent). Thus, Forsyth and Hall Counties play an important role in managing and protecting these waters.

TABLE 2
 Political Jurisdictions in the Study Area (percent of acreage per watershed)
Forsyth County Watershed Protection Plan

Jurisdiction	NPDES MS4 Community Status	Upper Metro Chattahoochee	Lanier Tributaries	Metro Chattahoochee	Etowah River	Little River
Forsyth	Phase I	0.03%	42.2%	16.0%	9.4%	1.3%
Cumming	Phase II		1.4%	0.6%		
Cherokee	Phase II			0.3%	32.7%	46.8%
Canton	Phase II				2.0%	0.5%
Holly Springs	Phase II					2.3%
Woodstock	Phase II					4.1%
Cobb	Phase I			12.9%		22.6%
Marietta	Phase I			2.1%		1.1%
Dawson		1.8%	1.1%		25.9%	
Dawsonville					0.5%	
DeKalb	Phase I			13.3%		
Atlanta	Phase I			0.4%		
Chamblee	Phase I			0.6%		
Decatur	Phase I			0.4%		
Doraville	Phase I			0.7%		
Fannin					0.2%	
Fulton	Phase I			14.2%		18.5%
Alpharetta	Phase I			3.8%		0.3%
Atlanta	Phase I			8.1%		
Roswell	Phase I			6.1%		2.7%
Gwinnett	Phase I		1.7%	12.7%		
Buford	Phase I			2.4%		
Duluth	Phase I			1.4%		
Sugar Hill	Phase I			1.7%		
Suwanee	Phase I			1.9%		
Habersham		26.6%				
Hall	Phase II	19.1%	43.7%	0.4%		
Gainesville	Phase II	0.7%	6.8%			
Flowery Branch	Phase II		1.3%			
Oakwood	Phase II		1.8%			

TABLE 2

Political Jurisdictions in the Study Area (percent of acreage per watershed)
Forsyth County Watershed Protection Plan

Jurisdiction	NPDES MS4 Community Status	Upper Metro Chattahoochee	Lanier Tributaries	Metro Chattahoochee	Etowah River	Little River
Lumpkin		22.2%			13.1%	
Pickens					15.6%	
Jasper					0.6%	
Towns		0.3%				
Union		0.5%				
White		28.7%				

Incorporated Areas within the County

Although there are several other small, unincorporated communities in Forsyth County, the City of Cumming is the only incorporated area (see Figure 1 and Table 3). As a result, the City, a Phase II MS4 permit holder, and the County, a Phase I MS4 permit holder, share the primary watershed management responsibilities within Forsyth County. The City represents an area of approximately 3,760 acres, almost 6 square miles, located along State Route 400 in the center of the County. Most of the City, or 97 percent, drains into the headwaters of Big Creek or to the headwaters of several tributaries to Lake Lanier (see Table 3). However, recent annexations are extending the City south into the headwaters of the Dave's Creek watershed, as well. Unincorporated communities in Forsyth County include Brookwood, Ducktown, Heardville, Hightower, Big Creek, Matt, Coal Mountain, Midway, Shakerag, and Pirkle Woods.

TABLE 3

City of Cumming by Watershed Area
Forsyth County Watershed Protection Plan

Watershed	City of Cumming	
	Acreage	Percent Coverage
Big Creek	1,988	53 %
Dave's Creek	110	3 %
Sawnee Creek / Lake Lanier Tributaries ^a	1,662	44 %
Total Incorporated Area	3,760	100 %

^a Not a community watershed since it is outside the study area

Watershed Protection Groups

Several watershed protection groups exist for the watersheds within Forsyth County. These watershed protection groups are comprised of concerned stakeholders and, in some cases, other organizations such as universities and local governments. The groups include:

- Upper Chattahoochee Riverkeeper
- Lake Lanier Association
- Upper Etowah River Alliance
- Etowah Habitat Conservation Plan

Their mission is generally to protect the watershed through public outreach/education, coordination with political jurisdictions, and development of watershed protection strategy recommendations.

Jurisdiction of Lake Sidney Lanier

The United States Army Corps of Engineers (USACE) has Proprietary or Managerial jurisdiction on USACE-managed Federal lands. Under Section 234 of the Flood Control Act of 1970, certain project personnel may enforce Code of Federal Regulations (CFR) Title 36 part 327. Also, under Section 10 of the Rivers and Harbors Act of 1899, as amended, and Section 404 of the Clean Water Act, certain USACE personnel may enforce portions of CFR Title 33 part 200. The State of Georgia and its political subdivisions retain statutory responsibility to enforce State and local laws.

Congress authorized construction of Lake Lanier in 1946. It became the northernmost link in a series of USACE-built lakes on the Apalachicola-Chattahoochee-Flint River system. Construction was started in 1951 and completed in 1956, and the lake was fully operational in 1958. The project's purposes (the first three are specific, congressionally authorized purposes, while the latter three arise from general statutory authority) are:

- Flood control - During times of heavy rainfall, runoff waters stored in the lake protect thousands of downstream homes, businesses, and farmlands from flooding.
- Hydroelectric power production - Electricity produced by the powerhouse generators provides pollution-free energy for peak demand.
- Navigation - Water stored in Lake Lanier can be released to increase downstream river depths, allowing commercial barge navigation of the Lower Chattahoochee River.
- Water supply and water quality - Water stored in the lake is the major water source for 50 percent of the population of Georgia.
- Recreation - Millions of visitors annually enjoy the recreational opportunities provided by the lake.
- Fish and wildlife management - The USACE and GADNR work jointly to implement management plans to ensure protection and enhancement of these resources.

Code and Regulation Responsibilities

Forsyth County has followed GAEPD and District guidelines to establish local rules, plans, and procedures for effective implementation of watershed and stormwater management activities. These regulations are adjusted as guidelines from GAEPD and the District are reissued and updated. The following paragraphs review the County's local ordinances, land use plan, development approval procedures, the County's SWMP required by the MS4 permit, water and sewer upgrades, the County's Parks and Recreation program, and the Greenspace Program.

Ordinance Revisions

Since local ordinances are critical to watershed management, the District-wide WMP recommended changes to local and State laws, regulations, and ordinances that would facilitate implementation of watershed management strategies. The District Board adopted six model ordinances to help ensure consistency in watershed management practices:

- Model Ordinance for Post-Development Stormwater Management for New Development and Redevelopment
- Model Floodplain Management/Flood Damage Prevention Ordinance
- Model Conservation Subdivision/Open Space Development Ordinance
- Model Illicit Discharge and Illegal Connection Ordinance
- Model Litter Control Ordinance
- Model Stream Buffer Protection Ordinance

These District model ordinances are a key requirement of the local stormwater management program activities described in the District-wide WMP. Forsyth County revised its Code of Ordinance, identified in Table 4, to meet the intent of the six District model ordinances. County staff initiated an extensive revision process to not only complete this task but to also revise the entire Unified Land Development Code in 2004. Final revisions to ordinances noted in Table 4 were presented to the Board of Commissioners for review and adoption in June 2004.

Since adoption of the Model Stream Buffer Protection Ordinance, the County has made additional revisions to its ordinances to clarify and expand on variance procedures and definitions for stream buffers. These revisions are currently released for public comment and are expected to be adopted later in 2006. Revisions to the ordinance include updates to definitions, information about variance requests, mitigation requirements, and more specific text regarding exemptions. Details regarding the specific revisions will be reported after the ordinance has been adopted.

The District finalized revisions to the Model Floodplain Management/Flood Damage Prevention Ordinance in February 2006, including: (1) a better definition of the "future-conditions" floodplain, (2) mapping requirements for local governments, and (3) procedures for development approvals in areas that have not been mapped. Forsyth County is developing revisions to their existing floodplain ordinance to follow the recommended revisions from the District. For these revisions and others that may occur later, Forsyth County will revise corresponding ordinances to meet the updated District guidelines after the model ordinance revisions are finalized.

TABLE 4
 Summary of Recent Revisions to Forsyth County Code of Ordinances and Unified Development Code
Forsyth County Watershed Protection Plan

Model Ordinance	Forsyth Reference	Comments
Model Ordinance for Post-development Stormwater Management for New Development and Redevelopment	Chapter 34, Article V. Stormwater Management (Ordinance No. 75) UDC Chapter 18-5.14, Drainage System. Tables 18.1 and 18.2. Forsyth County Stormwater Design Manual	Significant changes completed: <ul style="list-style-type: none"> – Adopted GSMM with Revised Forsyth County Stormwater Design Manual as an addendum – Revised applicability and added “Hot Spot” language – Revised definitions – Added requirement for Inspection and Maintenance Agreements
Model Floodplain Management/Flood Damage Prevention Ordinance	Chapter 46. Floods (Ordinance No. 55) Chapter 34, Article VI Regulated Floodplain for Big Creek (Ordinance No. 7)	Significant changes completed: <ul style="list-style-type: none"> – Combined two existing ordinances into one – Revised Definitions – Added requirements for plan review of the administrative (future) floodplain – Revised language to prohibit all new construction in floodplain
Model Conservation Subdivision/Open Space Development Ordinance	UDC Chapter 19, Conservation Subdivisions Ordinance No. 30, Comprehensive Zoning & Land Use	No changes necessary, met intent of model ordinance
Model Illicit Discharge and Illegal Connection Ordinance	Chapter 34 Environment, Article V. Stormwater Management. Sec. 34-187. Prohibition and illicit connections Road Drainage Code. Ordinance No. 15, Chapter 6. Material to be kept out of drainage system. Adopted 4/23/1984	No changes necessary, met intent of model ordinance
Model Litter Control Ordinance	Road Drainage Code. Ordinance No. 15, Chapter 6. Material to be kept out of drainage system. Adopted 4/23/1984 Ordinance No. 84 Article III, Litter Control	No changes necessary, met intent of model ordinance
Model Stream Buffer Protection Ordinance	Chapter 3. Definitions Chapter 18. Subdivisions and Land Development	Significant changes completed: <ul style="list-style-type: none"> – Revised Definitions – Added several references to the Georgia Stormwater Management Manual – Added new section (Article X) to provide additional support

Forsyth County Comprehensive Plan

The County's current Comprehensive Plan, adopted by the Board of Commissioners in February 2004, covers a time period from the present to 2025 and is designed to meet the requirements of the "Minimum Planning Standards and Procedures for Local Planning" of the Rules of the Georgia Department of Community Affairs, Chapter 110-12-1. The purpose of the Plan is to guide the intensity, location, and timing of new development and redevelopment and to ensure compatibility with existing development, future population and economic development trends, community infrastructure, and natural and cultural resources.

The plan is divided into 11 parts:

- Population
- Housing
- Economic Development
- Natural Resources
- Cultural Resources
- Community Facilities and Services
- Land Use
- Transportation
- Intergovernmental Coordination
- Implementation Program
- Capital Improvements

The intent of the land use element of the Comprehensive Plan is to guide all new development and redevelopment within the County to ensure that it is compatible with existing development. Additionally, the land use element is meant to ensure that the development is of high quality, is environmentally sensitive, and is based on the County's vision and goals. Development in Forsyth County has followed traditional development patterns of urban sprawl, moving from the City of Atlanta along major road and rail corridors. Road construction was the driving force in determining locations for land use with unrestricted development.

Table 5 shows the allocation of land uses in Forsyth County in 2003. Almost half, or 49 percent, of the County remained either undeveloped, in agricultural use, or set aside as park lands. Thirty-eight percent of the County was in residential use, while almost 5 percent was being used for commercial or industrial purposes. Forsyth County's Future Land Use Plan identifies and defines 18 land use categories that were consolidated to represent the categories in Table 5. It projects that by the Year 2025, over two-thirds of unincorporated Forsyth County, approximately 70 percent, will be in a low, medium, or high density residential use.

TABLE 5
Forsyth County Comprehensive Plan Existing and Future Land Use
Forsyth County Watershed Protection Plan

Land Use Category	Existing Percentage (2003)	Future Percentage (2025)
Residential	38.1%	70.6%
Undeveloped	27.0%	1.6%

TABLE 5
 Forsyth County Comprehensive Plan Existing and Future Land Use
Forsyth County Watershed Protection Plan

Land Use Category	Existing Percentage (2003)	Future Percentage (2025)
Agriculture	16.1%	0.0%
Parks/Recreation/Conservation	6.3%	6.0%
Road Right-of-Way (ROW)	6.1%	6.1%
Industrial	2.9%	5.4%
Commercial	1.9%	6.5%
Institutional/Public	1.5%	1.3%
Transportation/Communications/Utilities (TCU)	0.1%	3.0%
Landfill	0.0%	5.0%

Source: Forsyth County Comprehensive Plan 2004 - 2025 from
<http://www.forsythco.com/department.asp?DeptID=53Forsyth>.

Development Review

Providing adequate staff and resources for the review of new development or redevelopment and their compliance with the County's Unified Land Development Code is essential to the success of Forsyth County's WPP. The three primary departments with planning, review, and implementation responsibilities associated with watershed protection are the Planning, Engineering, and Water and Sewer Departments. Forsyth County also reviews land-disturbing activities within 2,000 feet of either bank of the Chattahoochee River for compliance with watershed protection guidelines in the Georgia Metropolitan River Protection Act (MPRA). Section 2.3 of Forsyth County's SWMP currently details the planning procedures and criteria for new development and redevelopment as follows. When the SWMP is revised, this procedure may be refined or changed depending on the County's needs to make procedures as streamlined and robust as possible:

Step 1: Plan Submittal-- All plans and supporting documents for new developments and redevelopments are submitted to the Department of Planning and Development except for initial submittals of Final Plats. Final Plats are submitted for review to the Department of Engineering along with the following supporting information:

- Dedication Stamp on Plats
- Right-of-Way Warranty Deed for all road ROWs
- Attorney's Title Certificate for all roads
- Performance Bond in the amount specified by the Department of Engineering
- Maintenance Bond on all roads in the amount specified by the Department of Engineering with an expiration date of no less than 18 months for the date of the Final Plat is approved
- Real estate transfer tax declaration
- Stormwater Facilities Inspection and Maintenance Covenant

Step 2: Plan Review Meeting-- Following Step 1, a plan review meeting is held by the Planning Department with a representative of each reviewing department present to distribute comments back to the developer and/or their agents for corrections, if necessary. The additional documentation submitted with Final Plat applications is

presented to the County's Legal Staff for review and certification. Any problems with these items will be handled between the County's Legal Staff and the developer's attorney. Once certified, the Legal Staff will return the documents to the Department of Planning and Development.

Step 3: Walk Through-- After the departmental comments have been addressed, and the corrections to the plans are made, the developer and/or their agent returns to each reviewing department to provide evidence that the required changes have been made. If the changes are satisfactory to the reviewing department, then said department may sign-off on the Application for Plan Approval and affix their departmental stamp to the plans.

Step 4: Plan Approval-- The developer and/or their agent will deliver to the Department of Planning and Development the plans approved by the other reviewing departments, with the appropriate stamps affixed, and the completed Application for Plan Approval with the signature of the respective departmental plan review personnel.

The Planning Department will verify that the reviewing departments have signed the Application for Plan Approval and stamped the plans. If any department has given conditional approval, said department must list under what conditions their approval is granted. Said conditions must be in letter-form on departmental letterhead, indicating the project and date of conditional approval, and delivered to Planning and Development prior to, or concurrent with, the sign-off of the plans granted conditional approval. In any conditional approval, the person so conditioning the plans must sign the letter of conditional approval and print their name for further clarification.

After the Department of Planning and Development has verified that all plans and supporting documents are true and correct, the Director, or his designee, will sign-off on the plans and supporting documents. In the case of subdivision construction plans and final plats, the Forsyth County Planning Commission, or their representative, must participate in the final approval. Final Plats will be ready for recording after all final approvals of the plats have been granted, and the legal documentation required has been approved by the County's Legal Staff.

After a final plat is approved and recorded, the Department of Engineering will schedule the ROW documents for the next scheduled Board of Commissioners' hearing. The Board of Commissioners will either accept or reject the ROW for County maintenance. Once the Board of Commissioners accepts the ROW, the Department of Engineering will record the deeds.

Step 5: Pre-construction Conference-- Grading permits will be issued after approvals have been granted by the appropriate reviewing departments. The permit is issued at a pre-construction conference with the Department of Engineering, the department responsible for inspection of the development site.

Step 6: As-built Policy-- An as-built is a civil drawing depicting completed commercial development and construction, as it exists in the field. As-builts are required to be submitted to the Department of Planning and Development on all commercial and industrial sites. The as-built should be submitted at around 90 percent completion of the site, sometime between the rough plumbing inspection and the final building inspection.

Upon approval of the as-built, the applicant may schedule the final building inspection. The Department of Engineering, Department of Water and Sewer, and Department of Planning and Development (including County Arborist) are responsible for reviewing the as-built application.

Stormwater Management Program

The Storm Water Phase I Rule (55 CFR 47990; November 16, 1990) requires all operators of medium and large MS4s to obtain an NPDES permit and develop a SWMP. In Georgia, GAEPD is the delegated State agency to administer the NPDES MS4 program. The program is designed to prevent harmful pollutants from being washed by stormwater runoff into the MS4 (or from being dumped directly into the MS4), then discharged from the MS4 into local water bodies.

The Environmental Protection Agency (EPA) did not develop baseline general permits for stormwater discharges from MS4s because of the wide range of conditions in different parts of the country and the varying water quality impacts on receiving waters. However, the SWMP must meet the standard of "reducing pollutants to the Maximum Extent Practicable (MEP)." EPA did not define MEP, thereby allowing flexibility in the development of site-specific permit conditions based on internal knowledge of the jurisdiction. The SWMP should include measures to accomplish the following tasks:

- Identify major outfalls and pollutant loadings
- Detect and eliminate non-stormwater discharges to the system
- Reduce pollutants in runoff from industrial, commercial, and residential areas
- Control stormwater discharges from new development and redevelopment areas.

Forsyth County's SWMP was completed and approved in 2005 and is supported by the County's use of the Georgia Stormwater Management Manual (GSMM) and recent revisions to its Code of Ordinances to meet the intent of the District Model Stormwater Ordinances. The long-term planning horizon of the District and Forsyth County's SWMP supports an adaptive management approach that allows time to evaluate options and make optimal decisions on allocation of limited resources to achieve desired results. More information regarding the SWMP activities is presented in the section of this document titled, "Best Management Practices."

Water-Supply Watersheds and Water Intake Facilities

There is one water intake facility in the Forsyth County study area. The City of Cumming facility withdraws water from Lake Lanier and some of this water is then pumped to the Forsyth County Water Treatment Facility. Prior to April 2000, the County's water was supplied almost exclusively through wholesale purchases from the City of Cumming and Fulton County. Beginning in April 2000, the Forsyth County began to produce its own potable water with the commissioning of the Forsyth County Water Treatment Facility (WTF). The County's water system consists of a raw surface water supply with a monthly average allotment of 14 million gallons per day (mgd) and a maximum daily withdrawal of 16 mgd. Current limitations at the raw water pump station restrict the amount of raw water that can be withdrawn and treated by Forsyth County to 11.9 mgd. Forsyth County's water system includes a 13.93-mgd water treatment plant and a water distribution system contain-

ing approximately 725 miles of water mains. Forsyth County and the City of Cumming are in the process of retrofitting portions of the raw water pump station to allow for raw water pumping capacity equal to the permitted treatment capacity.

All of Forsyth County drains either directly or indirectly to a water-supply watershed. These areas are governed by State Rules for Environmental Planning (Part V criteria) which were created to protect surface water supplies used for drinking water. The planning criteria vary based on the size of the water-supply watershed and proximity to the intake location.

Most watersheds in Forsyth County, including the Etowah River, Settingdown Creek, and Chattahoochee River are large water-supply watersheds (> 100 square miles) and are outside of a seven-mile radius of a water intake facility, which means that no impervious cover restrictions apply to them as a result of Part V criteria. However, the Etowah and Chattahoochee Rivers also fall under the “protected river” definition in the Part V criteria. As a result, a River Corridor Protection Plan has been adopted for the Etowah River. Part V criteria for the Chattahoochee River are superseded by MRPA, which provides regulations to manage and protect the Chattahoochee River within a 2,000-foot corridor on both sides of the river. Forsyth County is required to review all land-disturbing activities and certify that development follows guidelines for watershed protection in MRPA. Although there is a water intake facility for the City of Cumming and Forsyth County within the Lake Lanier watershed, the Part V criteria do not apply to Federal lakes.

Because the Big Creek watershed is a small water-supply watershed (less than 100 square miles), additional stream buffer requirements and impervious cover restrictions apply to this portion of Forsyth County. Moreover, the City of Roswell has a water intake facility that is located less than 7 miles from Forsyth County, requiring the County to adopt stricter restrictions for the portion of the watershed within 7 miles of the water intake facility. Depending on if the location in the watershed is within or outside 7 miles from the water intake facility, Part V criteria for the Big Creek watershed include a buffer distance of 50 or 100 feet along streambanks with an impervious and septic system setback of 75 or 150 feet from the streams. Other criteria apply to small watersheds such as Big Creek, including synthetic liners/leachate collection systems for landfills, no new hazardous waste treatment or disposal areas, limitations for existing hazardous waste treatment areas, and a limitation of 25 percent impervious cover.

Sewer Lines and Wastewater Reclamation Facilities

The majority of the County's population is still served by septic tanks and privately owned land application sites. Approximately 38 percent of Forsyth County's population (about 48,000 people) is served by private and public sewerage system. Thus, Forsyth County sewer lines are relatively new (mostly built after 1993) and are being sized so that they will be half full in 2025. The County does not have a large number of rehabilitations or upgrades to the relatively new existing sewer lines, although a contractor has been hired to inspect and address any inflow and infiltration problems. The County has ordinances in place to require public sewer as the sole sewage disposal option when any portion of the development is within 5000 feet of a public sewer line and the public sewer line can accommodate the anticipated effluent load. According to the 2005 Engineer's Report Water and Sewerage Revenue Bonds, the County's goal is to provide sewer service to 85 percent of

its new population and extend service to current private and septic tank owners at a measured pace.

Wastewater reclamation facilities (WRF) are the treatment centers and discharge points for household and industrial sewage. Wastewater is collected by gravity sewers and transported to the treatment facility via pump stations and force mains. Flow from the sewers is treated at the facilities and discharged to streams. The permitted treatment capacity of all County-operated treatment facilities is 2.01 mgd. This requires that a portion of the wastewater generated in Forsyth County be treated by private utilities, City of Cumming, and Fulton County through an intergovernmental agreement (Table 6). The City of Cumming has a WRF that discharges to Big Creek within the City limits.

TABLE 6
Intergovernmental Agreements for Water Reclamation Services
Forsyth County Watershed Protection Plan

Cooperating Agency	Date of Original Agreement	Agreement Expiration Date	Contracted Capacity (mgd)	Current Utilization (mgd)
City of Cumming Big Creek	1997	No expiration – purchased capacity	0.5	0.083
Fulton County Big Creek	February 6, 1980	February 6, 2030	1.25	0.94 ^a
John's Creek	April 21, 1993	April 21, 2043	0.75	0.75 ^a

^a Based on 2004 Forsyth County meter data – average annual flow

The Forsyth County sewer system extends throughout the areas of the County adjacent to the City of Cumming and southern portions of the County, including the Big Creek, Chattahoochee, Etowah, Lake Lanier, and Settingdown Creek drainage basins. The County also owns treatment capacity in several private wastewater treatment facilities. See Table 7 for a complete list of the public and privately owned WRFs in Forsyth County. Dick's Creek WRF is located south of Old Atlanta Road and east of SR 400 on this tributary to the Chattahoochee River. The Fowler WRF, located south of Highway 9, uses membrane bioreactor technology to recycle wastewater so it can be discharged safely to irrigate agricultural fields, golf courses, and parks. If these uses are not sufficient to manage all the treated flow from the WRF, then the rest of the flow is irrigated on the Threatt Land Application System (LAS), located in the southeastern corner of the County on McGinnis Ferry Road adjacent to the Chattahoochee River. Permit limits for the Cumming WRF are presented in Table 7.

TABLE 7
Phased Forsyth County Wastewater Treatment Capacities in Chattahoochee and Etowah River Drainage Basins
Forsyth County Watershed Protection Plan

Facility/Contract	Plant Capacities	Plant Capacities
	(mgd)	(mgd)
Year	2005	2010
Publicly Owned System operated by Forsyth County		
Shakerag WRF (proposed)	1.25 ^a (Phase I)	2.50 (Phase II)
Fowler WRF	1.25	5.00
James Creek WRF	0.50 ^a	1.00
Dick's Creek WRF	0.76	0.76
Subtotal	3.76	9.26
Privately Owned System contracted by Forsyth County		
The Hampton	0.275	0.90
Hillside at Mt. Ridge	0.036	0.072
The Manor LAS	0.25	0.50
Polo Golf and Country Club	0.338	0.338
Olde Atlanta Club LAS	0.262	0.262
Parkstone	0.10	0.25
Windermere LAS	0.50	0.50
Subtotal	1.76	2.82
Publicly Owned System contracted by Forsyth County		
Fulton County Contract	2.00	2.00
City of Cumming Contract	0.50	0.50
Subtotal	2.50	2.50
TOTAL MMADF^b	8.02	14.6
TOTAL ADF^b	6.42	11.7
PROJECTED WASTEWATER ANNUAL ADF^c	6.34	10.3

^a Assumes James Creek WRF operational in 2006; Phase I Shakerag WRF will be completed between 2005 and 2010.

^b MMADF = Maximum Month Average Daily Flow. MMADF is 1.25 times average daily flow (ADF). All flows are MMADF except where indicated.

^c Projected flows are the combined flows from the Chattahoochee and Etowah River drainage basins, which receive flows from the Chattahoochee, Big Creek, Etowah, and Settingdown sub-basins.

Source: Sewer System Master Plan (Dec. 2002) and Etowah Basin Update (Feb. 2004) prepared for FCWSD by JJ&G.

Forsyth County is actively developing its wastewater conveyance and treatment system. However, development in the remote regions of the County is currently outpacing the County's ability to reach all potential new customers. Forsyth County has taken a proactive approach toward working with developers who wish to develop residential properties where the sewer conveyance system has not yet reached. According to this approach, new developments that want private WRFs are required to design, permit, construct, and operate state-of-the-art biomembrane treatment facilities. In some cases, Forsyth County takes over the operation of the facilities shortly after construction and in other cases the private utility operates and maintains the facility.

As older, private WRFs begin to age and the useful life expires, requiring major capital improvements, Forsyth County plans to connect the population served by the private utilities. These additional flows are accounted for in the design of new facilities and future expansion phases. For example, the new Threatt site WRF, currently in the permitting and planning stages, is earmarked as a regional reuse facility for the southern portion of Forsyth County and ultimately will allow Forsyth County to reduce reliance on Fulton County and private utility providers in that area.

The Forsyth County has received a draft Waste Load Allocation (WLA) for cold weather discharge from James Creek WRF and Fowler WRF. The permit documents are currently being finalized for this discharge. Upon award of permit, Forsyth County will be able to send reuse quality effluent to Big Creek between November 1 and April 30.

Forsyth County has also received a WLA for discharge to the Chattahoochee River for 6 mgd at the Threatt Site. This WLA serves as the foundation of the County's effort to have a combined discharge on the Chattahoochee River as recommended by the District.

The Dick's Creek WRF has been in operation since 1992. The most recent major expansion occurred in 1997, increasing the facility's rated capacity to 0.76 mgd. The WRF was privately owned and operated from 1992 to January 2005. In January 2005, the Dick's Creek WRF was purchased from a private owner/operator. The WRF currently operates under GAEPD permit number GA02-082 for land application purposes. After construction of the cold weather discharge improvements is complete, the WRF will operate under NPDES permit no. GAU0038563 which allows cold weather discharges.

Parks and Recreation

According to the Forsyth County Comprehensive Plan, approximately 7,274 acres, or 5.29 percent of the County land area are occupied by park, recreation, or conservation lands. This acreage includes both active and passive recreation facilities owned and operated by Forsyth County, the Federal government and the USACE. These areas are significant to watershed protection because they provide areas of mainly pervious land uses to promote water quality. The Forsyth County Parks and Recreation Department is responsible for programs, facilities and related public outreach. The Parks Division of the Department is responsible for the safety and maintenance of the park facilities.

Greenspace Program

Protecting undeveloped land, or greenspace, is one way to limit the amount of impervious cover within a watershed, reducing the pollutants associated with nonpoint source

pollution. The County currently has approximately 10,781 acres of permanent and non-permanently protected greenspace, including Federal, State, County, and privately owned land. Current greenspace lands in Forsyth County include the protected river corridors along the Etowah Chattahoochee Rivers, the Sawnee Mountain conservation zone, and existing parks. The permanent protection of greenspace is an objective of the Forsyth County Board of Commissioners (BOC). The County is an active participant in the Georgia Greenspace Program. Steps continue to be taken to meet the Georgia Greenspace Program goal of permanently protecting 20 percent of the County land area (that is, 29,000 acres) with activities including: identifying lands that can be properly and formally protected as greenspace, acquiring lands where feasible, and implementing other methods of land protection such as conservation easements. Due to its rapid development, the County should use multiple sources for greenspace lands such as from stream buffer areas/floodplains, conservation subdivisions, utility easements, greenways, bikeway development, agricultural land, steep slopes, scenic viewsheds, historic/archeological sites, and other categories of land that might be protected. The Forsyth County Greenspace Program is a combined effort between the Planning Department and the Parks and Recreation Department.

Funding for Implementation

Protection of water quality is an important mission, and continued implementation of watershed protection and stormwater activities will require additional funding from a variety of sources. This section describes Forsyth County's current budget as it relates to the primary departments responsible for implementation activities and provides suggestions for future implementation funding.

County Departments

Forsyth County is committed to dedicating sufficient budgets to effectively manage and control influences to the County's watersheds and stormwater systems. Forsyth County's gross budget for FY 2006 is \$71,718,629. The following County departments perform activities associated with watershed protection and stormwater management:

- Engineering
- Water and Sewer
- Planning
- Keep Forsyth County Beautiful
- Board of Commissioners
- Public Information
- Sheriff's Office

These departments are supported by the General Fund, except for the Water and Sewer Department, which is supported by an Enterprise Fund. Money collected through the Enterprise Fund is used for operating costs within the Water and Sewer Department. It should be noted that revenue collected by Financial Services and Planning for site plan reviews, variances, zoning amendments, and issuance of construction permits is returned to the General Fund and does not have to be expended on related activities. The 2006 budgets for each of these departments are summarized in Table 8.

Departments provide different services to maintain watershed protection and stormwater management activities for the County. A description of the responsibilities for each Department is included in the paragraphs below.

TABLE 8
2006 Budget for County Departments
Forsyth County Watershed Protection Plan

Department	FY 2004 Actual	FY 2005 Budget	FY 2006 Budget
Engineering	\$ 760,280	\$ 984,915	\$ 1,046,316
Water and Sewer*	\$ 35,192,697	\$ 4,100,766	\$ 17,965,553
Planning	\$ 3,268,505	\$ 3,839,130	\$ 4,303,877
Keep Forsyth County Beautiful	\$ 168,264	\$ 197,917	\$ 185,635
Board of Commissioners	\$ 921,770	\$ 792,770	\$ 888,209
Public Information	\$ 67,663	\$ 141,876	\$ 292,962
Sheriff's Office	\$ 16,664,568	\$ 19,101,267	\$ 20,461,707

*Water & Sewer net income, as Water & Sewer is supported by an Enterprise Fund.

Engineering

The mission of the Engineering Department is to provide safe, efficient design, construction, maintenance, and operation of the County's surface transportation for the public. The department also reconstructs existing roads and builds other road projects, coordinates contracted work, installs and maintains traffic control, striping, signs, and signals. The Department consists of the Signals Division, Stormwater Division and the Traffic Division. The Stormwater Division implements Forsyth County's Stormwater Management Program, including enforcement of the Erosion and Sediment Control Ordinance, the environmental monitoring and pollution prevention programs, inspection of detention facilities and drainage systems.

Water and Sewer

The mission of the Water & Sewer Department is to provide Forsyth County with the highest quality of water and sewer service through superior customer support, strong financial management, progressive leadership, and environmental stewardship. Our mission is to protect the environment by complying with, or exceeding, all state and federal regulations governing the operation of Forsyth County's Water Reclamation Facilities.

Planning

The function of the Department of Planning is to promote and enhance the quality of life of the residents, property owners, and businesses of Forsyth County. The Department accomplishes its mission through programs and services that encourage quality development. The Department consists of the Planning Division, Permitting Division, Building Inspections Division, Business License Division and the GIS Division. The Planning Department is also responsible for the review of stream buffer compliance.

Keep Forsyth County Beautiful

The mission of Keep Forsyth County Beautiful (KFCB) is to cooperate with government, businesses, schools, civic organizations, and citizens in a joint effort to improve beautification, litter reduction, recycling, and other public outreach/education activities. Maintaining a beautiful county is a team effort which needs to involve everyone. The mission of KFCB strives to educate the public on recycling, solid waste reduction, litter control, and how to protect natural resources as well as to offer guidance to any organization or individual with interests in these areas. The KFCB affiliate is made up of four County maintained positions. A volunteer group of Board of Directors administers KFCB as a nonprofit 501c3 organization with support from several corporate sponsors and members. The KFCB Board meets every third Thursday of the month at 3:30 pm to coordinate information regarding events, memberships, business sponsorships and volunteers.

Keep Forsyth County Beautiful maintains a Public Resource Library in their office that allows individuals such as teachers, parents and students to sign out items that serve as environmental education tools. Resources in the library include reference books, videos, CDs, posters, kits, puzzles and brochures. Items are provided free of charge through a sign out process by the Keep Forsyth County Beautiful Staff. KFCB holds over ten different programs in cooperation with local citizens and schools. The organization also facilitates environmental education programs to County students and teachers including TEAM (Teach, Encourage And Model) Recycling Environmental Educator Workshops. While public information from KFCB is available all year round, there are several annual events hosted to enhance volunteer participation and public awareness of environmental issues. Annual events include: Bring One For the Chipper Christmas Tree Recycling, The Great American Cleanup, Liberty Gardens Ceremony, Phone Book Recycling Contest, Volunteer Recognition Banquet, TEAM Recycling Educator Workshop, Adopt-A-Road Picnic, Litter Index, Rivers Alive Waterway Cleanup, annual storm drain stenciling, and America Recycles Day.

Board of Commissioners

The mission of the Forsyth County Board of Commissioners is to exercise the powers, duties and responsibilities vested in and imposed upon it as the duly constituted governing authority of Forsyth County. Forsyth County operates under the commission-county manager form of government. The Board of Commissioners is made up of five members, each living in a specific district but elected by voters countywide to serve 4-year terms. Each year in January, the five members elect one of their own to serve as chairman of the board for the coming year.

Public Information

The Public Information Office plays the pivotal role in explaining and interpreting public policy as set by the Board of Commissioners, informing citizens about the day-to-day operations of local government, promoting the County to visitors and investors and helping to shape the County's public image.

Sheriff's Office

The Sheriff's Office is charged with serving and protecting Forsyth County citizens and visitors. The Sheriff's Office enforces all laws and ordinances, protects life and property, preserves the peace, and strives to prevent crime and disorder.

Potential Funding Sources

Use of the General Fund for watershed and stormwater activities is beneficial; however, other funding sources may be appropriate due to the instability of funding due to competing General Fund demands. The following paragraphs describe funding sources that the County will investigate for use in the future to promote watershed protection and stormwater activities.

Stormwater Utility

A Stormwater Utility would provide a dedicated funding source for watershed and stormwater activities. The public would recognize stormwater management as a type of utility service, and charges would relate to stormwater contributions. As a cost of using this type of funding, the Stormwater Utility would provide public acceptance challenges and also require implementation expenditures. A study to assess the feasibility of a Stormwater Utility for the Forsyth County will be investigated. Results of the analysis will determine if the concept is feasible and the utility could generate significant funding for the implementation of a more comprehensive stormwater management program. With the new requirements for watershed management from the District and the need for implementation of the Phase I MS4 program, the County plans to assess the stormwater utility issue as soon as possible.

Sales Tax Revenues

Georgia law permits a special sales tax to be imposed by local referendum and to be collected in a defined area for defined uses. Some of the revenues may be available for infrastructure improvements as part of the WPP if it is specified in the enabling referendum. However, the legal requirements for using sales tax revenues include approval by voters through a referendum.

Cost Sharing

A government's cost of capital improvements may be shared with businesses or other governmental entities that stand to gain substantial benefits from the improvement. It is not uncommon for manufacturing enterprises to provide partial capital funding for improvements designed to provide services to their facilities. The County should continue to be alert to the potential for opportunities to share stormwater and watershed improvement costs with the City of Cumming.

State Revolving Funds

State Revolving Funds may be appropriate for watershed and stormwater management projects in Forsyth County. The Clean Water State Revolving Fund (CWSRF) is a Federal funding and loan program administered by the Georgia Environmental Facilities Authority (GEFA) for projects including a wide variety of local community improvement projects. Loans are available at a low interest rate for a maximum of twenty years. To receive funding or a loan, Forsyth County would be required to complete an application including plans, schedules, and costs.

319 Nonpoint Source Grant Funds

Congress amended the CWA in 1987 to establish the Section 319 Nonpoint Source Management Program because it recognized the need for greater Federal leadership to help focus State and local nonpoint source efforts. Under Section 319, States, Territories, and Indian Tribes receive grant money which supports a wide variety of activities including technical assistance, financial assistance, education, training, technology transfer, demonstration projects, and monitoring to assess the success of specific nonpoint source implementation projects. In Georgia, the State has identified the following types of projects as eligible to receive funding:

- Development, revision or implementation of TMDL or Watershed Management Plans for TMDL and 303(d)-listed streams
- Restoration, protection, and prevention activities
- BMP demonstrations
- Water quality assessment and monitoring
- Technical assistance
- Regulatory and enforcement activities
- Education information and activities

The County could use this funding to complete watershed improvement projects to meet District goals to have Watershed Improvement Plans in place according to a schedule that is currently being updated by the District.

Conservation Programs that Provide Incentives and Assistance

Many conservation programs that are federally and state funded can provide private landowners with monetary and technical assistance to promote goals that are consistent with the WPP. Forsyth County could coordinate applications with private landowners to encourage watershed management and protection activities. Programs include the Wetlands Reserve Program (WRP), Partners for Fish and Wildlife (PFW), Environmental Quality Incentives Program (EQIP), and Conservation Reserve Program (CRP). For instance, the EQUIP provides technical, educational, and financial assistance to eligible farmers and ranchers to address soil, water, and related natural resource concerns. The program is funded through the Commodity Credit Corporation. Cost-share payments may be made to implement one or more eligible structural or vegetative practices on eligible land, such as animal waste management facilities, terraces, filter strips, tree planting, and permanent wildlife habitat. Similarly, the CRP provides cost-share incentives for farmers to convert highly erodible cropland, or other environmentally sensitive land, to vegetative cover, such as tame or native grasses, wildlife plantings, trees, filter strips, or riparian buffers.

Identification of Pollutant Sources

A variety of planning studies have been performed for Forsyth County and the watersheds within its jurisdiction in response to the area's continued growth. Figure 2 shows current

land use and Figure 3 shows potential pollutant sources located in the County. Some studies are described in this section to provide an overview of pollutant sources that must be controlled and managed to maintain and improve watershed integrity, including:

- The 1999 watershed assessment, which was completed to establish baseline conditions in the watersheds of the County
- Additional monitoring since the watershed assessment
- GIS mapping of land use and potential pollutant sources
- Adoption of management measures and estimated load reductions as specified in the Georgia Stormwater Management Manual (GSMM)

Watershed Assessment from the 2000 WAMP

Forsyth County completed a watershed assessment as part of the WAMP in 2000 to determine the current condition of the major tributaries within the County sewer service area, to assess the sizes and effects of various pollution sources, and to evaluate options for improving and protecting water quality. The WAMP consisted of four basic components:

- Watershed characterization was conducted to determine the health of the streams by sampling water quality, in-stream/riparian habitat, aquatic macroinvertebrate communities, and fish communities.
- Watershed modeling was performed using a computer program that uses rainfall, soil, land use, and water quality data to simulate the amount of stormwater (and the pollution carried by it) that enters a stream during a rain event. For this study, a watershed model was used to predict future changes in water quality under various land uses.
- Watershed management planning involved evaluating results of watershed characterization and modeling efforts. Recommendations were made on ways to protect and improve water resources in the County over time.
- Public involvement activities were completed to gather information used to shape the development of the WAMP.

The WAMP, which was accepted by the Forsyth County Board of Commissioners and submitted to and approved by the GAEPD in the summer of 2000, provides guidance on how the County can achieve both economic development and watershed protection. Watershed characterization results and land use are included below to document baseline conditions that were determined in 1999. Since the 1999 assessment, Forsyth County has conducted annual monitoring based on a monitoring plan that is discussed later in this document.

Baseline Conditions from 1999 Assessment

To facilitate public communication, the study area was subdivided into five “community watersheds” for the 2000 WAMP. The creation of community watersheds narrowed the focus areas, allowing the evaluation of site-specific water quality issues and opening dialogue with residents about effective solutions for their communities. The Upper Lakefront Community Watershed and the Six Mile Creek and Lower Lakefront Community Watershed represent the small watersheds draining to Lake Lanier. Dave’s Creek Community Watershed represents the small watershed that drain directly to the Chattahoochee River just south of Lake Lanier. The Big Creek Community Watershed represents the single largest watershed in Forsyth County that drains to the Chattahoochee River Basin. These four community watersheds are approximately 123.9 square miles in total area. The community watershed which drains to the Coosa River Basin is the Etowah River, Settingdown Creek, and Squattingdown Creek Community Watershed, which is approximately 89.7 square miles.

In 1999, dominant land use categories varied among the drainage basins and within the watersheds (Table 9).

TABLE 9
1999 Land Use from the WAMP
Forsyth County Watershed Protection Plan

Community Watersheds	Undeveloped (Agricultural, Forested, Parks/Open Space)	Residential (Low & High)	Urban (Commercial, Industrial, and Major Roads)	Other (CFOs, Institutional, Transitional, Water)
<i>Chattahoochee River Basin</i>				
Big Creek	57.0%	23.8%	15.7%	3.5%
City of Cumming Service Area	53.1%	28.8%	6.4%	11.7%
Dave’s Creek	53.5%	32.6%	10.7%	3.2%
Six Mile Creek and Lower Lakefront	35.4%	23.6%	3.1%	37.9%
Upper Lakefront	40.9%	24.1%	0.8%	34.2%
<i>Coosa River Basin</i>				
Etowah River, Settingdown Creek, and Squattingdown Creek	79.3%	12.6%	1.9%	6.2%

Sources: BASINS (US Environmental Protection Agency [USEPA], v.2, 1993-1994); Forsyth County Planning Department hard copy maps; digital, color aerial photography (DigiAir, January 1999); and land use data from the Tennessee Valley Authority’s Clean Water Initiative, Nonpoint Source Pollution Pilot Program.

Forest land use was the most prevalent land use in all community watersheds except Six Mile Creek and the Lower Lakefront. While forest land use was most prevalent, it still comprised less than the 50 percent of the land use within each of the community watersheds. Low-density residential was the second most prevalent land use in Forsyth County, except for the: (1) Six Mile Creek and Lower Lakefront Community Watershed, (2) Upper Lakefront Community Watershed, and (3) Etowah River, Settingdown Creek, and Squattingdown Creek Community Watershed. Agriculture was the second most prevalent land use in the Etowah River, Settingdown Creek, and Squattingdown Creek Community Watershed (22.6 percent). Forest and water were the second most dominant land uses in the

Six Mile Creek and Lower Lakefront and the Upper Lakefront Community Watersheds, respectively. The following paragraphs describe baseline watershed conditions using data collected in 1999.

The overall aquatic integrity (habitat, biological, and water quality) was substantially degraded in the Big Creek Community Watershed. Elevated levels of nutrients, sedimentation, copper, and habitat degradation were the primary stressors in this watershed. Fecal coliform bacteria levels were also above the State standard. Changes in land use associated with development were identified as the primary causes of habitat degradation. Water quality degradation appears to be the result of urban runoff and point sources within the headwaters of Big Creek.

In the Dave's Creek Watershed, the habitats were moderately degraded. This degradation is primarily due to sedimentation associated with ongoing construction and development in the community watershed and the resulting increases in impervious surfaces and associated increases in stream flows.

The Six Mile Creek and Lower Lakefront Community Watershed was relatively unimpacted. Sedimentation and elevated levels of nutrients were identified as the primary stressors in the Six Mile Creek watershed. The sources of sedimentation and erosion in this watershed were changes in land uses in the headwaters of the systems and the resulting changes in hydrology from increased impervious area.

In the Upper Lakefront Community Watershed, aquatic integrity was relatively unimpaired when compared to regional reference stations. In Two Mile Creek, fecal coliform bacteria was the primary parameter of concern and may be the result of poultry and agricultural operations in this watershed. As development continues, sedimentation from new construction and the impervious surfaces associated with the large tracts of unbuffered residential land located adjacent to Lake Lanier and its tributaries will become more problematic.

Conditions in the Etowah River Community Watershed ranged from good to highly degraded. Brewton Creek had the least developed watershed and overall, was the least disturbed of all the stations evaluated in the County. Settingdown Creek was significantly degraded due to sedimentation and habitat alteration. Past disturbance (channelization) and ongoing agricultural operations may be causes of this degradation.

Current Monitoring Results

This Environmental Monitoring Plan (EMP) was developed and implemented in 2003, as a result of the WAMP, to help provide an understanding of how biological and water quality is changing and to identify and characterize pollutant sources. Monitoring information is used as a basis for watershed management strategies, identification of retrofitting and restoration sites, and a determination of the success of the watershed management implementation strategies. Monitoring results since 2003 have shown some consistencies, some improvements (that is, lower nutrient levels), and some declines in water quality (that is, higher fecal coliform, sedimentation) since the 1999 assessment. These monitoring results are discussed in annual reports submitted to GAEPD in 2004, 2005, and 2006. Results will continue to be compared with the baseline 1999 assessment in future annual reports.

As reported in the 2006 annual report, water chemistry results for 2005/2006 suggested that for some streams in Forsyth County, such as Brewton, Sawnee, and Settingdown Creeks, water quality is generally being maintained as compared to previous years of sampling from 1999 and 2003/2004. For other streams, water quality results showed that several stations have changed since the 1999 assessment, although values are mostly consistent with 2004 results. When comparing water quality values between those collected in 1999 and those from the current year, it is important to note that five additional wet weather samples were collected in the 2005/2006 monitoring period compared to previous monitoring in 1999. Due to this fact, water quality averages are more likely to be higher in the 2005 monitoring period, because wet weather events tend to increase concentrations of water quality parameters. When comparing minimum and maximum values, it is also important to note that rain events in 1999 were all below 1.00 inch, which is not true for 2005/2006. The lower intensity of rainfall in 1999, due to a severe drought, led to a narrower range in water quality values, while the higher rainfall intensities in 2005/2006 led to a broader range in water quality values. However, when differences between 1999 and 2005/2006 are substantial, watershed conditions are likely to have caused the change. Identifying substantial changes will vary based on the parameter, and these substantial changes, as well as other water quality trends, are identified in the following paragraphs.

Table 10 summarizes overall results for key parameters at each station by comparing data to State standards. In addition, patterns were identified based on differences between wet and dry weather events. Other sampled parameters that were not included in the table were generally consistent at all stations and within the expected range. The water quality patterns and parameters that are emerging in Forsyth County suggest that nonpoint source pollution due to watershed land use changes may be a contributor to current stream conditions. For example, high levels of turbidity, TSS, nutrients, and fecal coliform were found at Big, Taylor, Four Mile, and Dick's Creeks mainly during wet weather sampling. These watersheds with decreased water quality are also the watersheds that have experienced the most existing or new development.

One station that had decreased water quality (due to fecal coliform concentrations) during wet and dry weather sampling was the watershed of Two Mile Creek. Water quality often changes due to storm events because greater runoff, associated with urbanization, can carry an increased level of pollutants to streams. Two Mile Creek has agricultural land use and increasing residential development, and the agricultural land use may be influencing the water quality parameters, especially nutrients and fecal coliform. The County has implemented a public education program that includes providing farmers with materials to promote sustainable farming practices, as well as informing residents of septic maintenance and other watershed protection measures. Other watersheds in the County, such as Big, Taylor, Four Mile, and Dick's Creeks, have less agricultural land use, but have a greater proportion of urbanized areas with completed and new infrastructure, which may be influencing the pattern of lowered water quality during wet weather events.

TABLE 10
Summary of Key Watershed Findings by Station for January 1, 2005 to March 31, 2006
Forsyth County Watershed Protection Plan

Stream	Water Quality Parameters					Biological Parameters		
	Turbidity and TSS	Nutrients Total P and N	Copper	TOC	Fecal Colifom	Habitat	Invertebrates	Fish
Taylor Creek at Hwy 53 (TLF-1)	Usually low, but occasionally high during only some wet events	Nutrient levels were sometimes moderately elevated	Below detectable limits	Average values are within normal range. Wet events produce some values over normal range.	Dry weather values below State standards, individual wet event values well above	Not assessed	Not assessed	Not assessed
Two Mile Creek at Wallace Wood Rd. (TMF-1)	Low during dry weather events, but high during wet events	Nutrient levels were sometimes moderately elevated	Below minimal detectable limits	Most readings within normal range. Some wet weather values over normal range	Individual wet and dry values above State standards	Comparable to Reference	"Very Good" ecological integrity, according to State protocols.	"Fair" ecological integrity, according to State protocols
Four Mile Creek at Keith Bridge Rd. (FMF-1)	Low during dry weather events, but high during wet events	Nutrient levels were usually high	Below minimal detectable limits	Wet weather values typically over normal range, two values much higher than normal	Dry values below and individual wet values above State standards	Not assessed	Not assessed	Not assessed
Six Mile Creek at Burrell Mill Rd. (SMF-1)	Usually low, but occasionally high during only some wet events	Nutrient levels were usually high	Below minimal detectable limits	Most readings within normal range. Some wet weather values over normal range	Some individual wet values above State standards	Partially Similar to Reference	"Fair" ecological integrity, according to State protocols	"Poor" ecological integrity, according to State protocols
Brewton Creek at Mt. Tabor Rd. (BRF-1)	Consistently low	Nutrient levels were low, except for one isolated dry weather event	Below minimal detectable limits	Most values within normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed

TABLE 10
Summary of Key Watershed Findings by Station for January 1, 2005 to March 31, 2006
Forsyth County Watershed Protection Plan

Stream	Water Quality Parameters					Biological Parameters		
	Turbidity and TSS	Nutrients Total P and N	Copper	TOC	Fecal Colifom	Habitat	Invertebrates	Fish
Settingdown Creek at Wallace Tatum Rd. (SDF-3)	Usually low, but occasionally high during only some wet events	Nutrient levels were moderately elevated during some wet events	Below minimal detectable limits	Most values within normal range	Most individual values below State standards, some wet events were above	Dissimilar to Reference	"Fair" ecological integrity, according to State protocols	"Very Poor" ecological integrity, according to State protocols
Settingdown Creek at John Burrus Rd. (SDF-4)	Low during dry weather events, but high during wet events	Nutrient levels were somewhat elevated during wet events	Below minimal detectable limits	Some wet weather values above normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed
Sawnee Creek at Pilgrim Mill Rd. (SNF-1)	Usually low, but occasionally high during only some wet events	Nutrient levels were generally low	Below minimal detectable limits	Most values within normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed
Big Creek at Bethelview Rd. (BGF-3)	Usually low, but occasionally high during some wet events	Nutrient levels were moderately elevated during some wet events	Below minimal detectable limits	Some wet weather values above normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed
Big Creek at Majors Rd. (BGF-2)	Usually low, but occasionally high during some wet events	Nutrient levels were moderately elevated during wet events	Below minimal detectable limits	Most values within normal range	Most individual values below State standards, some wet events were above	Dissimilar to Reference	"Very Poor" ecological integrity, according to State protocols	"Very Poor" ecological integrity, according to State protocols
Big Creek at McGinnis Ferry Rd. (BGF-1)	Usually low, but occasionally high during some wet events	Nutrient levels were moderately elevated during wet events	Below minimal detectable limits	All values within normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed

TABLE 10
Summary of Key Watershed Findings by Station for January 1, 2005 to March 31, 2006
Forsyth County Watershed Protection Plan

Stream	Water Quality Parameters					Biological Parameters		
	Turbidity and TSS	Nutrients Total P and N	Copper	TOC	Fecal Coliform	Habitat	Invertebrates	Fish
Chattahoochee River at McGinnis Ferry Rd. (CHF-1)	Usually low, but occasionally high during some wet events	Nutrient levels were generally low to moderate with elevated values during an isolated rain event	Below minimal detectable limits	Most values within normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed
Dick's Creek at Old Atlanta Rd. (DKF-1)	Usually low, but occasionally high during some wet events	Nutrient levels were generally low with occasional moderately elevated values during heavy rain events	Below minimal detectable limits	Most values within normal range. Several wet weather values are above normal	Most individual values below State standards, some wet events were above	Dissimilar to Reference	"Fair" ecological integrity, according to State protocols	"Very Poor" ecological integrity, according to State protocols
James Creek at James Burgess Rd. (JSF-1)	Usually low, but occasionally high during some wet events	Nutrient levels were generally low with occasional moderately elevated values during heavy rain events	Below minimal detectable limits	All values within normal range	Most individual values below State standards, some wet events were above	Not assessed	Not assessed	Not assessed
Orr Creek at Jason Drive (ORF-1)	Not sampled	Not sampled	Below minimal detectable limits	Not sampled	Exceeded the summer geometric mean State standard of 200 cfu/100mL	Not assessed	Not assessed	Not assessed
Kelly Mill Branch at Kelly Mill Rd. (KMF-1)	Not sampled	Not sampled	Not sampled	Not sampled	Exceeded the summer geometric mean State standard of 200 cfu/100mL	Not assessed	Not assessed	Not assessed

P = phosphorous
N = nitrate/nitrite
TOC = total organic carbon

In addition to long-term monitoring stations, geometric means for fecal coliform that were calculated quarterly at Orr Creek and Kelly Mill Branch exceeded the summer geometric mean State standard of 200 cfu/100mL during one 30-day period for Kelly Mill Branch and two periods for Orr Creek in 2005. Fecal coliform is a notable factor in decreased water quality at the impacted sampling stations. The elevated fecal coliform values were most commonly associated with heavy storm events and were most likely caused by nonpoint source runoff due to urban and/or agricultural land uses. For instance, failing septic systems in urban and residential areas could be a contributor to nonpoint source runoff in Forsyth County. The same pattern holds true for elevated nutrient levels, many of which occurred in unison with the elevated fecal coliform values.

Five of the fourteen long-term monitoring stations were also sampled in 2005 for biotic communities. Biological monitoring parameters included fish communities, benthic macroinvertebrate communities, and physical habitat assessments. Stations representing Two Mile and Six Mile Creeks scored moderate to good in all analyses while stations representing Big, Settingdown, and Dick's Creeks generally scored lower across the three parameters (Table 10). Despite the decreased water quality parameters found at some of the study stations, biological and habitat results show that, for four of the five stations analyzed, at least one biotic integrity score was rated as fair to good. This includes sites that also exhibited poor water quality characteristics.

Although data from Two Mile Creek suggested a fecal coliform problem, biological data indicated that the watershed may still be sustaining a healthy biological community. Contrastingly, some more developed watersheds, such as Big Creek, did not show as much of a decrease in water quality in the past reporting year, but the biological community has been impacted. This indicates a decline in the physical habitat provided by these streams, most likely due to factors such as increased stormwater pulses caused by higher development in the watershed, and bank erosion. The differences in the water quality and biological datasets may represent a delay in water quality impacts or may exhibit the strong influence of stormwater runoff on the water quality data. The County has implemented watershed management activities to help manage stormwater and prevent further degradation to streams. In all watersheds, the County is committed to maintaining and improving water quality so that the biological community can be sustained and improved.

Current Land Use and Impervious Cover

Forsyth County watersheds are changing due to greater amounts of low and medium-density residential land use (Figure 2). Forsyth County has been managing for extremely rapid growth, and over the last five years the County has been one of the five fastest growing Counties in the United States. Between 2000 and 2005, the County's population grew by 44 percent from 98,407 to 140,393 (Bill Johnson--Atlanta Journal and Constitution, March 23, 2006).

To estimate the relative impact of this development in each watershed, impervious cover was compared over time. The 1999 impervious cover data from the WAMP was compared to 2003 impervious cover data, which was calculated using the 2003 land use data (and average impervious cover for each land use type) from the Atlanta Regional Commission. As impervious cover increases in a watershed, hydrological conditions of streams change leading to increased stormwater pulses, sediment transport, and bank erosion.

Impervious cover has continued to increase in the County, as shown in Table 11. From 1999 to 2003, Big Creek, Dick's Creek, and Two Mile Creek had an increase in impervious cover greater than 10 percent. Because Big Creek and Dick's Creek have watersheds with an estimated total impervious cover greater than 30 percent, they are considered to be the most developed in the County. Estimated impervious cover is positively correlated to biological and water quality results, suggesting that streams in Forsyth County are being more heavily affected by nonpoint source pollution in watersheds where development is higher.

TABLE 11
Estimated Total Impervious Cover for the Drainage Area of Each Station
Forsyth County Watershed Protection Plan

Station	1999 Impervious	2003 Impervious	Change
BGF-1	15.68%	24.64%	8.96%
BGF-2	14.13%	32.28%	18.15%
BGF-3	18.22%	33.97%	15.75%
BRF-1	4.44%	13.75%	9.31%
DKF-1	21.84%	33.01%	11.17%
FMF-1	5.57%	12.15%	6.58%
JSF-1	12.82%	23.83%	11.01%
SDF-3	NA	10.65%	NA
SDF-4	NA	20.52%	NA
TMF-1	5.55%	16.96%	11.41%
TLF-1	NA	22.85%	NA
SNF-1	NA	26.67%	NA
SMF-1	19.91%	22.37%	2.46%

Management Measures

Forsyth County is facing increased urbanization and more intensive land uses, and this was reflected in the samples taken downstream of the most heavily developing watersheds. Agricultural impacts due to feedlots, livestock, and row crops are still present in the County, but these types of land use are being replaced by residential and commercial land uses. Thus, the County works with the Natural Resources Conservation Service (NRCS) to continue outreach efforts aimed at low-impact farming practices (as specified in the WAMP), but the majority of the County's planning and development practices address water quality protection from more urban land uses that increase impervious cover, as discussed in the previous section. To quantify the water quality benefit of management measures, the WAMP analyzed load reductions expected for various structural management measures that could be used for new development associated with

urbanization. Total Suspended Solids (TSS) was the water quality indicator used to represent pollutant loading due to its high correlation with percent imperviousness (CH2M HILL, 2000). Table 12 provides a summary of estimated load reductions for several BMPs.

TABLE 12
TSS Removal for BMP Options
Forsyth County Watershed Protection Plan

BMP	TSS Removal (%)
Extended Wet Detention Pond	80
Extended Dry Detention Pond	50
Constructed Wetland	80
Vegetated Filter Strips	50
Sand Filters	80
Infiltration Trenches	80
Oil/Grit Separator	60
Grassed Swales (2% slope, dam)	15

Aquatic integrity can be maintained and improved by decreasing habitat alteration due to point and nonpoint source pollutants, erosion and sedimentation, flow regime modification, and riparian area degradation. In the 2000 WAMP, a water quality model (GIS Pollutant Load Model) was developed to estimate pollutant loadings to streams from nonpoint sources, based on current land use conditions, and from point source discharges. The County used this model to develop watershed and stormwater management techniques to lessen the impacts of changing land uses and potential pollutant sources on stream integrity (see the following section for more detail). In response to watershed stressors, the County has developed local ordinances related to watershed protection and implemented a public education program to increase awareness of nonpoint pollution sources. As Forsyth County faces continued urbanization and growth, the County is committed to using monitoring data as a reference by which to determine the most effective placements for watershed management and protection measures.

Forsyth County has adopted the Georgia Stormwater Management Manual (GSMM), Volumes 1 and 2 (2001) in 2004 to facilitate implementation of pollutant load reducing management measures. Estimates of load reductions from various management measures can be found in the GSMM. In addition, the County provided more specific stormwater management guidance via the development of the Forsyth County Addendum to the GSMM.

According to the GSMM, “the increase in frequency and duration of bankfull flow conditions in stream channels due to urban development is the primary cause of streambank erosion and the widening and downcutting of stream channels.” Due to a fast-growing population, Forsyth County is becoming more urbanized with greater areas of

impervious cover leading to greater stresses on watersheds. To lessen the impacts of urbanization on the watershed, the GSMM provides stormwater management measures that decrease channel erosion by storing and releasing stormwater runoff from stormwater runoff events.

Best Management Practices

BMPs are implementation measures that help to maintain and improve a watershed. Implementation measures have been described in annual reports submitted to GAEPD since 2004. Many implementation measures are also required as part of the GSMM (discussed above) and the Forsyth County Addendum to the GSMM, Forsyth County's SWMP, which was approved by GAEPD in August 2005.

Structural and Source Control Measures as Listed in the SWMP

The SWMP addresses the BMPs and specific programs that are being implemented by the County to protect the watershed from harmful pollutants in stormwater runoff and uncontrolled water volumes. When the SWMP is revised, the County may revise the following list based on regulatory guidance and effectiveness of each BMP; thus, some of the following sections provide a brief summary of the information included in greater detail in the SWMP.

The SWMP addresses the various activities that affect the quantity and quality of the stormwater entering the County stormwater conveyance system, including: structural controls (such as requirements for stormwater ponds and oil/grit separators), operation and maintenance procedures for public and privately owned structures, stormwater pollution control plans (new development and redevelopment), street maintenance, flood management projects, County facilities, and pesticides, fertilizer, and herbicides application. The SWMP also describes the County's efforts to inventory and inspect industrial facilities for compliance with stormwater regulations. The SWMP also includes lists of highly visible pollutant sources to be inspected, as well as a description of the County's activities to identify highly visible pollutant sources.

Erosion and sedimentation control inspections and procedures are described in the SWMP, as well as enforcement efforts and efforts to educate local construction site operators. The Engineering Department is responsible for completing field reports for all soil erosion inspections. An order of precedence has been established whereby the most urgent cases are handled first. Therefore, complaints filed with the Engineering Department receive priority.

The SWMP describes a proactive program to identify intentional and unintentional illicit discharges into the County stormwater system. While complete elimination of illicit discharges is unrealistic, this program strives to minimize their occurrence in the County through proper management of toxic materials, public education, inspections, stream walks, dry weather outfall screening, and efficient response when they do occur.

Watershed Restoration and Retrofit

Since the WAMP, Forsyth County has investigated watershed priorities and funding sources for restoration and retrofitting activities to improve and protect streams, riparian

areas, and water quality, as described below.

Settingdown Creek Ecosystem Restoration Report

As part of a watershed assessment conducted by Forsyth County in 1999 to 2000, several watersheds were identified that needed restoration to meet their designated uses. In 2003, the County began trying to identify potential funding sources to move forward with restoration in the designated priority watersheds. Section 206 of the Water Resources Development Act of 1996 provides the USACE, Mobile District, the authority to restore degraded aquatic ecosystems. Therefore, the County approached USACE to prepare an Ecosystem Restoration Report (ERR) for Settingdown Creek and its tributaries. Forsyth County participates as the non-federal cost-share partner of USACE. The study area consists of the entire Settingdown Creek Watershed within Forsyth County. This watershed is located within the upper Piedmont province and drains a 50-square-mile area. The lower portion of Settingdown Creek enters Cherokee County to the west near the confluence of the creek with the Etowah River. The ERR will be designed to investigate planning, engineering, design, environmental, and land acquisition activities associated with developing restoration plans. The project was approved in 2004 but was delayed due to USACE funding issues. Forsyth County and USACE plan to start the project as soon as funding becomes available.

Watershed Improvement Plans

The District recommends that local governments develop watershed improvement plans to help restore streams to their designated uses, as well as support future NPDES permitting activities. The baseline watershed conditions that were established in the 2000 WAMP and subsequent monitoring efforts provide an inventory of the existing stream system condition, allowing the County to prioritize improvement efforts in each watershed. Due to the effort and costs involved, the County must use a phased approach to develop each watershed improvement plan based on the priority level. In substantially impacted watersheds (as identified by the District), watershed improvement plans are required to be submitted in 2007. For other watersheds, watershed improvement plans will be developed beginning in 2008 until eventually all watersheds in the County have a watershed improvement plan. Big Creek watershed in Forsyth County is included by the District as a high-priority substantially impacted watershed. Thus, the Big Creek Watershed Improvement Plan will be developed in 2006 and 2007.

Watershed improvement plans will be developed based on the recommendations from the WPP, 2000 WAMP, GAEPD guidance, and the District-wide WMP and its amendments. Watershed improvement plans will quantify linear feet of eroded streambank requiring stabilization and restoration and identify other measures that would decrease pollutant loading to streams. Plans will be prepared to assess the current and proposed restoration and retrofitting activities, roles, regulatory requirements, responsibilities, and schedule for implementation.

Public Education Program

Various community outreach activities are undertaken by the County, as described in the WAMP, SWMP, and annual reports. Forsyth County is involved in several efforts to

disseminate information to the public concerning watershed issues and recycling efforts. The County actively encourages residents to participate in any of several community activities to raise awareness of water pollution, littering, and water quality. Forsyth County participates in the District's Clean Water Campaign (CWC). Brochures prepared by CWC are distributed by the County and links to the CWC web site are included on the County web site. Links on the County web site also point to the Earth911 web site, which is another organization that promotes environmental awareness. Annual programs are mainly run by Keep Forsyth County Beautiful (KFCB) and include cleanup events (that is, Rivers Alive, Adopt-a-Road, and Great American Cleanup), presentations to school children and civic groups, Adopt-a-Stream training, and storm drain stenciling. In addition, the County provides informational brochures at its offices and during stormwater-related inspections.

Forsyth County retained CH2M HILL to further develop their Public Information and Education activities in response to guidance implemented by GAEPD in March 2005. The resulting plan provides a comprehensive description of existing and future mechanisms for engaging and educating the public about watershed and stormwater protection issues. In addition, the plan incorporates multiple GAEPD guidelines and comments and also to follow the guidelines established by the District. The following activities are included in the plan:

- Forsyth County promotes access to educational and informational material through its web site. Printouts from the web site and others linked to the County web site are included in annual reports.
- Adopt-a-stream workshops are advertised on the Georgia Department of Natural Resources web site. Workshops are planned to be held once a year for introductory, water chemistry, and biological training, depending on level of public interest.
- The County conducts annual storm drain marking.
- At least one river cleanup event is planned to be held every year, with prior mailings to schools and civic groups to encourage participation.
- Stormwater-related articles are published in local and regional newspapers (Forsyth County News, Atlanta Journal-Constitution). Article topics are available from the Clean Water Campaign.
- The County partners with KFCB, taking advantage of opportunities to provide speakers and literature at KFCB's events and activities to promote Forsyth County's watershed protection activities, such as Adopt-a-Road, Adopt-a-Stream, Rivers Alive Waterway Cleanup, TEAM Recycling Educator Workshop, Volunteer Recognition Ceremony, and other events.
- The County maintains continued participation in the Clean Water Campaign efforts to distribute informational literature about stormwater issues.
- Outreach efforts to school aged children through presentations made available to teachers. Information could also be made available to teachers in the Public Resource Library that is maintained by KFCB in the Engineering Department. This library

provides educational resources such as reference books, videos, CDs, posters, kits, puzzles, and brochures free of charge.

- Forsyth County may work with the local homebuilders association to conduct training sessions. The sessions would focus on methods and Best Management Practices that developers can use to control stormwater runoff and pollution.
- The County may use and expand its existing Speakers Bureau to include a series of presentations related to WAMP initiatives. Presentations may be delivered at meetings of local civic groups and organizations, such as environmental groups, Rotary clubs, church groups, the Cumming-Forsyth County Chamber of Commerce, KFCB, and affiliate groups.
- The County attempts to brief the Forsyth County Commissioners and other community leaders to provide an overall picture of the stormwater activities in the County.
- The County is investigating the development of short, informative messages to be printed on bills, bill inserts, or the outside of the mailing envelope. Through this method, virtually every household in the County may be reached.
- Pet owners often do not realize the impacts that pet waste has on local surface water quality. Because most pet owners visit a veterinarian office at least on an annual basis, the County can use this method to distribute a targeted message to a specific group of people.

Overall, these activities raise public awareness about watershed and stormwater management among various economic and demographic subsets of Forsyth County's population. Raising general public awareness will help local residents understand the role individual behaviors play in creating nonpoint source pollution and other problems (such as flooding, erosion, etc.).

TMDL Management Strategies

Section 305(b) of the CWA requires that states develop and institute a biannual (every other year) monitoring and reporting program that describes water quality conditions of state waters. This report, known as the 305(b) report, provides an assessment of surface-water quality as supporting, partially supporting, or not supporting a designated use. The report also provides information on parameters violated, causes of the violations, and actions planned to reduce the problems. The report considers both point and nonpoint source pollution issues. Long-term monitoring of these streams is essential for tracking future changes in water quality, early detection of infrastructure maintenance issues, and the long-term goal of meeting their designated uses. Table 13 illustrates the streams listed within Forsyth County. The County's watershed improvement efforts are a priority in 303(d)-listed streams. Because listed streams are spread throughout the County, water quality protection and management must be implemented on a County-wide basis.

GAEPD is required to develop segment-specific Total Maximum Daily Loads (TMDL) and corresponding implementation plans that outline the steps to be taken to restore a stream segment to its designated use. A TMDL is the amount of a pollutant that can be assimilated

by the receiving waterbody without exceeding the applicable water quality standard. A TMDL is the sum of the individual waste load allocations (WLAs) from point sources and load allocations (LAs) for nonpoint sources, as well as natural background (40 CFR 130.2) for a given waterbody. The TMDL must also include a margin of safety (MOS), either implicitly or explicitly, that accounts for the uncertainty in the relationship between pollutant loads and the water quality response of the receiving water body. TMDLs may be expressed in terms of either mass per time, toxicity, or other appropriate measures.

TABLE 13
Streams Listed in Georgia 305(b) Report ^a
Forsyth County Watershed Protection Plan

Watershed/Stream	River Basin	Criterion Violated ^b	Evaluated Causes ^c	Stream miles	Existing TMDL/ % Reduction
Not Supporting Designated Use					
James Creek	Chattahoochee	FC	UR	2	
Orr Creek ^d	Chattahoochee	FC, Cu	UR	3	91%
Six Mile Creek	Chattahoochee	FC	UR	2	
Partially Supporting Designated Use					
Big Creek	Chattahoochee	FC, Cu	UR	3	39%
Four Mile Creek	Chattahoochee	FC	UR	3	
Kelly Mill Branch ^d	Chattahoochee	FC	UR	2	3%
Sawnee Creek	Chattahoochee	FC	UR	2	
Taylor Creek	Chattahoochee	FC	UR	3	
Two Mile Creek	Chattahoochee	FC	UR	5	
Settingdown Creek	Etowah	Bio	UR	3	

Source: GAEPD, 2006

^a Note that, as acknowledged in the Georgia 305(b) report, the data used to develop these lists are not rigorously screened and/or subjected to standard quality control protocol for use in this manner.

^b FC = fecal coliform bacteria; Cu = copper; Bio = Biological Criteria

^c UR = urban runoff/urban effects; NP = nonpoint sources/unknown sources

^d Denotes watershed shared with the City of Cumming

According to the Georgia 2006 draft 303(d) list for stormwater permittees, TMDLs for stream segments in Forsyth County have been developed and approved for all the listed streams except Settingdown Creek. In the Chattahoochee River Basin, James Creek, Orr Creek, and Six Mile Creek are not supporting their designated uses. Urban runoff is identified as the primary cause for these waters not meeting their uses. The 303(d) list from 2006 (see Table 10) identified fecal coliform bacteria as the predominant cause of water quality violations in the County. The exceptions are Orr Creek and Big Creek in the Chattahoochee River Basin, which are also listed for copper violations. Forsyth County shares jurisdictional responsibilities with the City of Cumming for Orr Creek. These TMDLs are discussed in the following sections, along with the District TMDL strategies that provide an adaptive management approach to restoring stream segments to their designated uses.

TMDL Stream Monitoring

As part of the Environmental Monitoring Plan (EMP), the objectives of TMDL stream monitoring are to locate sources of water quality impairment in the watershed, identify

streams needing further action, and fulfill the TMDL monitoring portion of the District's guidelines. Most stream segments were included as part of the long-term monitoring plan; thus, no additional sampling was needed for these 303(d)-listed stream segments. The long-term monitoring plan is described later in this document. A study has begun for fecal coliform sampling (at Kelly Mill Branch and Orr Creek since 2004) and copper sampling (at Orr Creek since 2005) of stream segments from the 303(d) list. At these streams, 30-day geometric means are collected quarterly for fecal coliform, as described by the District-wide WMP (2003), and quarterly samples are collected for copper, as described in the District-wide WMP. The data are collected and analyzed to identify pollution sources. The data generated from the study of the listed stream segments in Forsyth County may eventually result in watershed improvements and the delisting of those segments. TMDL water quality studies are essential in managing Forsyth County's watersheds and in collecting important information for the adaptive watershed management approach being used by the County.

Fecal Coliform

In the Chattahoochee River Basin, the existing TMDL from 2003 for fecal coliform involves 79 stream segments, of which three are in Forsyth County. WLAs, shown in Table 14, have been developed for Big Creek, Kelly Mill Branch, and Orr Creek. For fecal coliform bacteria, the TMDLs are expressed as counts per 30 days as a geometric mean. The WLA established for Orr Creek requires a 91 percent reduction in fecal coliform bacteria. The TMDL projects the need for a combined reduction of 82 percent in Big Creek and 91 percent in Orr Creek for point and nonpoint sources of fecal coliform to meet water quality standards. As illustrated in Table 13, a number of stream segments are listed for fecal coliform in the 2006 draft 303(d) list, and while a specific WLA has not been developed for these segments, it is expected that the implementation plan activities will be similar.

TABLE 14
Existing Fecal Coliform Waste Load Allocations (WLAs)
Forsyth County Watershed Protection Plan

Stream Segment	Current Load (counts/30 days)	WLA (counts/30 days)	WLA _{sw} (counts/30 days)	LA (counts/30 days)	MOS (counts/30 days)	TMDL (counts/30 days)	Percent Reduction
Big Creek – Headwaters to Cheatham Creek	7.73E+12	2.12E+11		5.34E+12	1.39E+11	1.39E+12	82%
Kelly Mill Branch	4.23E+11			3.47E+11	4.12E+10	4.12E+11	3%
Orr Creek	5.02E+12	2.56E+11		1.41E+11	4.42E+10	4.42E+11	91%

WLA = Waste load allocation

WLA_{sw} = waste load allocations from stormwater discharges

LA = Load allocation for nonpoint sources

MOS = Margin of safety

TMDL = Total maximum daily load

Fecal coliform bacteria is the primary reason for streams being listed as “impaired” in the Georgia 305(b) report (GAEPD, 2006). Forsyth County and the Atlanta Regional Commission (ARC) are currently developing TMDLs for the listed stream segments in the Chattahoochee River. With the pending issuance of the fecal coliform TMDLs, this investigation may also serve as a reference for future studies. However, effective reduction in fecal coliform levels to meet the standard may be difficult due to the great variety of sources and the ubiquitous nature of the contamination. GAEPD has recognized the difficulty in meeting the current fecal standard and is currently developing an alternative standard (for *Escheria coli* bacteria), which represents the potential human health risks associated with pathogens in surface waters.

Point Sources

Fecal coliform permit limits for NPDES-permitted facilities are presented in Table 15 as they were listed in the TMDL plan for the Chattahoochee River Basin (GAEPD, 2003a). The City of Cumming WRF and Tyson Foods, Inc. are the only NPDES point sources that discharge directly to into one of the three studied watersheds. Table 15 compares the actual 2000 discharge from each WRF with its permit limits. Neither facility is approaching its permitted limit for fecal coliform, so based on the findings of the TMDL source assessment, NPDES point source fecal coliform loads from wastewater treatment facilities do not significantly contribute to the impairment of the listed stream segments. This is because these facilities are required to treat to levels corresponding to instream water quality criteria.

TABLE 15

NPDES Facilities Discharging Fecal Coliform in the Chattahoochee River Basin, as listed in the 2003 TMDL Plan for the Chattahoochee River
Forsyth County Watershed Protection Plan

Facility	Receiving Stream	Permit #	Actual 2000 Discharge		NPDES Permit Limits		Number of Violations July 1998- June 2001
			Average Monthly Flow (mgd)	Geometric Mean (No./100 mL)	Average Monthly Flow (mgd)	Average Monthly FC (No./100mL)	
Cumming WRF	Big Creek	GA0046019	0.87	2.5	2.0	200	1
Tyson Foods, Inc.	Unnamed Trib / Orr Creek	GA0001074	1.22	18.3	n/a	400 daily max	0

Data Source: GAEPD, February 2003a.
mL = milliliter

Additional sources have been on line since the TMDL was implemented in 2003. As discussed in a previous section of this document, the Fowler WRF and the Dick’s Creek WRF are both NPDES permitted facilities. However, fecal coliform bacteria levels in discharges from these facilities are highly treated with advanced technologies and then discharged at land application sites. Thus, water quality impacts due to these facilities are minimal.

Nonpoint Sources

The Chattahoochee River TMDL notes that, in general, nonpoint sources cannot be identified as entering a waterbody through a discrete conveyance at a single location. Likely

nonpoint sources of fecal coliform bacteria in these watersheds include wildlife, livestock, and leaking septic and sanitary sewer systems. Fecal coliform loads from NPDES-permitted MS4 areas may be significant, but these sources cannot be segregated easily from other stormwater runoff.

Protection Plan Strategies

Forsyth County can best address the fecal coliform bacteria listings in its jurisdiction by using an adaptive management strategy that involves public participation and intergovernmental coordination to reduce the discharge of pollutants to the maximum extent practicable. Based on data from the 1999 watershed assessment and subsequent monitoring, it is not clear that fecal coliform exceedances are due to malfunctioning sewer or septic systems. Other nonpoint sources of fecal coliform include domestic and wild animals, as well as pets. Management practices, control techniques, public education, and other appropriate methods and provisions may also be employed. In addition to implementing the Long-Term Monitoring Plan, Forsyth County should proactively implement the following strategies.

- Enforce ordinance to require connection to public sewer line if an existing line is within 5000 feet of any part of a new development.
- Uphold requirements that all new and replacement sanitary sewage systems be designed to minimize discharges into storm sewer systems.
- Accelerate implementation of MS4 stormwater management program BMPs.
- Further develop and streamline mechanisms for reporting and correcting illicit connections, breaks, surcharges, and other sanitary sewer system problems.
- Continue efforts to increase public awareness and education about the impacts of human activities in urban settings on water quality, ranging from the consequences of industrial and municipal discharges to the activities of individuals in residential neighborhoods (including control of domestic animal wastes and septic system maintenance).
- Facilitate interjurisdictional coordination with the City of Cumming to maximize funding resources available to improve water quality and aquatic integrity in shared watersheds.

Copper

A copper TMDL report for the Chattahoochee River Basin was published in January of 2003. According to the 2003 report, elevated copper levels are indicative of illicit discharges, runoff from roads and bridges, and runoff from new and existing development. Dissolved copper standards for use classifications of Georgia streams are dependent on water hardness. Forsyth County currently has one stream segment, Orr Creek, listed as not supporting for copper. Forsyth County also has another stream segment, Big Creek, that is listed as partially supporting for copper. Table 16 shows the chronic and acute copper concentrations for the two listed stream segments.

Based on monitoring from the past year at Big Creek and Orr Creek, no copper levels were found to be above the reportable limit of the laboratory. However, the reportable limit is

greater than acute and chronic criteria listed in the TMDL Implementation Plan (20 ug/L). Thus, before streams can be recommended for delisting, future analysis of dissolved copper concentrations in listed streams will be performed using approved methods with lower detection limits.

TABLE 16
Allowable Instream Copper Concentrations
Forsyth County Watershed Protection Plan

Listed Stream	Copper (µg/L)			
	Dissolved Acute Criterion	Dissolved Chronic Criterion	Allowable Total Acute Criterion	Allowable Total Chronic Criterion
Big Creek	3.64	2.74	10.2	7.67
Orr Creek	4.05	3.02	8.91	6.64

Data Source: GAEPD, 2003b

Copper permit limits for NPDES-permitted facilities are presented in Table 17 as they were listed in the TMDL Implementation Plan for the Chattahoochee River Basin (GAEPD, 2003b). The City of Cumming WRF and Tyson Foods, Inc. are the only NPDES point sources that discharge directly to into one of the three studied watersheds.

TABLE 17
NPDES Permitted Facilities for Discharging Copper, as listed in the 2003 TMDL Plan for the Chattahoochee River
Forsyth County Watershed Protection Plan

Facility Name	Permit No.	Average or Permitted Flow (mgd)	Listed Watershed
Cumming WRF	GA0046019	8	Big Creek
Tyson Foods, Inc.	GA0001074	1.4	Orr Creek

Data Source: GAEPD, 2003b

Implementation Schedule of Management Measures

Forsyth County's WPP includes a suite of activities to be implemented over time by multiple departments. This section summarizes these implementation activities, discusses funding sources, and lays out a schedule for each department to reference. The WPP is a living document based on an adaptive management approach that allows time to evaluate options and make optimal decisions on allocation of limited resources to achieve desired results.

Schedule for Implementing Management Measures

Specifically identifying the “next steps” for implementation of this WPP by the various responsible departments is essential to its success. Table 18 summarizes management measures and other actions that have been or will be implemented by the County.

TABLE 18
Schedule for Watershed Implementation Activities
Forsyth County Watershed Protection Plan

Activity	Responsible Department	Frequency/ Implementation Date
Sedimentation Controls		
Conduct at least monthly erosion site certifications by certified inspector with weekly inspections for significant sites	Engineering	Ongoing
Provide certification program for developers on sedimentation and erosion control practices	Engineering	Annually
Stormwater Controls		
Develop process for monitoring issued permits and tracking compliance with permits	Engineering	2007
Stream Buffers		
Additional revisions will be adopted to clarify and expand the existing ordinance.	Planning	2006
Untrained staff should participate in District training seminars for stream buffers	Planning/ Engineering	Ongoing
Stormwater Management		
Perform GIS mapping of BMPs and impervious area	Engineering	Ongoing
Identify illicit connections through dry-weather screening and commercial/industrial inspections according to current District guidelines.	Engineering	Annually
Adopt District Post-Development Stormwater Management Ordinance and use of criteria that meet the intent of the Georgia Stormwater Management Manual	Engineering	June 2004
Implement Development Review Requirements from Ordinance and Georgia Stormwater Management Manual	Engineering	June 2004
Develop inspection and maintenance procedures for all (public and private) stormwater management ponds at new and existing developments, and submit procedures to GAEPD	Engineering	2004
Develop inspection and maintenance procedures for the County's storm sewer system and submit to GAEPD	Engineering	2005
Develop a stormwater management training program for County employees and submit to GAEPD	Engineering	2007
Continue to implement street cleaning program	Engineering	2005
Develop procedures to improve enforcement of ordinances, regulations, and maintenance of stormwater facilities, assess existing and new flood control projects for water quality impacts, require modification of those not in compliance with District guidelines	Engineering	Ongoing
Require proper disposal of storm system wastes	Engineering	Ongoing

TABLE 18
 Schedule for Watershed Implementation Activities
Forsyth County Watershed Protection Plan

Activity	Responsible Department	Frequency/ Implementation Date
<i>Watershed Improvement</i>		
Implement an effective public education/outreach program to promote water quality awareness	Public Relations/ Engineering	Ongoing
Inspect sewer lines for inflow and infiltration, as well as inspect pumping stations	Engineering	Ongoing
Require sewer connection in appropriate areas	Engineering	Ongoing
Initiate Watershed Improvement Planning Process for Big Creek	Engineering	2006
Implement watershed improvement projects along Big Creek upon completion of planning process	Engineering	2008
Initiate Restoration Action Strategy/Ecosystem Restoration Reports for other impacted watersheds in the County	Engineering	2009 and Beyond
<i>Total Maximum Daily Load (TMDL)</i>		
Continue proactive implementation of stormwater management activities	Engineering	Ongoing
Facilitate interjurisdictional coordination with the City of Cumming to maximize funding resources available to improve water quality and aquatic integrity in shared watersheds	Water and Sewer	Ongoing
Continue to confirm the 303(d) listings and further isolate potential sources	Engineering	Ongoing
<i>Long-Term Monitoring</i>		
Conduct long-term ambient water quality monitoring according to current District guidelines	Engineering	Ongoing
Conduct biological monitoring	Engineering	Biannually
Identify specific sources of water quality problems based on monitoring data and follow-up inspections of suspect areas	Engineering	Ongoing
<i>Reporting</i>		
Submit Annual Progress Report to GAEPD and the District.	Engineering	Annually

The GAEPD has stated that implementation of the WPP will be coupled with regulatory permits for water and wastewater facilities. Permit holders will need to document that they have made meaningful progress in protecting water quality, as described in the guidance provided by GAEPD in 2005. In cases where a degradation trend is identified, permit holders must modify the plan to address causes of the degradation. Because environmental monitoring often does not show trends over a single year, it is proposed that implementation occur on a 5-year cycle as described in the District-wide WMP.

Schedules and budgets are tentatively proposed for programming purposes, but improving impacted areas are preliminary at this time, as many program details are undefined and must be finalized prior to action. This plan must be dynamic and flexible, because the starting dates of several proposed programs or activities may need to be staggered, and programs and activities may need to be modified as experience is gained in implementation.

Therefore, the dates, costs, and other specifics must be considered as general guidance at this time with further refinement as the WPP continues to evolve. This is particularly true with regard to the watershed restorations and retrofits, which can be quantified only after stream reconnaissance studies have been conducted for the impacted watersheds.

Implementation of the program will entail the participation of several departments, including Engineering, Water and Sewer, and Planning. The successful implementation of the WPP mandates the close cooperation of County staff. Each entity participating in the coordination effort must take ownership and be responsible for the success of the program within its jurisdiction.

Long-Term Monitoring Plan

Understanding the sources and magnitudes of stream impairment is fundamental to developing effective strategies for achieving water quality improvements and restoring or maintaining biotic integrity. A monitoring program helps provide this understanding. The purpose of this section is to outline some major considerations shaping development of a long-term strategy for data collection.

Purpose and Objectives

The County's long-term goals are consistent with the GAEPD's position that all jurisdictions should implement effective nonpoint source programs to achieve and maintain beneficial uses of its waters that are regulated by the state. The purposes of a long-term monitoring program are multifaceted and involve establishing baseline conditions, identifying water quality impairments and improvements, as well as monitoring the effectiveness of the WPP and recommended BMPs. By comparing monitoring data to water quality standards and data from previous years, the County can identify any required modifications to make implementation activities more effective. Objectives are listed below:

- **Document Stream Improvement** – Implementation of BMP and land use control measures should result in measurable enhancements in water quality and the biotic integrity of streams. The monitoring program should be designed to collect the data needed to document stream improvements and any pollutant reductions that can be attributed to the WPP implementation.
- **Identify Streams Requiring Further Action** – Not all streams in the study area were sampled in the watershed assessment, and additional and continuous monitoring is needed to determine whether other stream segments may need further site-specific actions.
- **Monitor Effectiveness of the WPP** – The ultimate goal of the program is to maintain or improve existing conditions in the watersheds. The monitoring program must be designed to determine the extent to which the recommended combinations of BMPs and retrofitted stream segments are meeting this goal.
- **Monitor BMP Effectiveness** – Recommendations for BMPs and restoration projects are based primarily on literature values on pollutant-reduction efficiencies. Therefore, the effectiveness of certain groups of BMPs will be monitored by taking site-specific water quality measurements to help determine the effectiveness of the BMPs.

Environmental Monitoring Program

Forsyth County established its EMP prior to completion of the District-wide WMP; however the EMP still meets the intent of the District WMP to collect data that is representative of drainages for the entire County. Although some aspects of the EMP do not follow District recommendations exactly, the County's EMP exceeds many of the District guidelines. As appropriate, the County will modify its monitoring efforts to be more consistent with the current District guidance.

Forsyth County has an ongoing water quality program that includes long-term water quality monitoring on 14 streams in Forsyth County (Table 19), visual inspections of streams and industrial areas for water quality problems (i.e., spills, illicit discharges, etc.), and written documentation of findings. The County also performs biannual biological monitoring for fish, macroinvertebrates, and physical habitat at five locations that are also sampled for water quality. As described in a previous section, the County also performs additional TMDL monitoring for streams that are 303(d)-listed, but not included in the long-term monitoring. Forsyth County is also required to perform some of their existing monitoring protocols as they are described in the SWMP for their NPDES permit requirements and for the MS4 program, including outfall screenings for illicit discharges and commercial/industrial inspections. At least 150 MS4 outfalls are screened during dry weather for illicit discharges and maintenance issues, and 4 MS4 outfalls are screened twice annually during wet weather for illicit discharges. A more detailed description of the County's sampling protocol for 2006 is provided in the Water Quality Sampling Plan (Appendix B).

TABLE 19
Summary of Level of Effort and Station Location According to the EMP
Forsyth County Watershed Protection Plan

Program Element	Method/Frequency	Notes
Long-Term Ambient Trend Monitoring	14 stations ¹	Stations located in the Chattahoochee River Watershed, Etowah River Watershed, and the Lake Lanier Watershed (see Table 21)
Dry Weather Illicit Discharge Screening	150 dry weather discharge screenings / year ¹	Rotate sites annually as necessary based on data collected through water quality sampling.
Commercial/Industrial Inspection Program	5% of operations ¹	Inspect a minimum of 5% of relevant industrial/ commercial operations, based on standard industry classification codes, each year.
Watershed Assessment Monitoring	Completed	See Chapter 4, <i>Community Watershed Assessment and Management Plan</i> (CH2M HILL, 2000)
TMDL Implementation. Monitoring and Delisting	11 stations	See Table 13 for the list of locations described as currently not supporting, or partially supporting, their designated uses.
Biological and Habitat Assessments	5 stations/every 2 Years on a rotating basis ¹	GAEPD WRD methodology

¹ This number may change when regulatory guidelines are finalized

² As of the publication of this document, the District requires biological and habitat assessments every 5 years. However, based on guidelines from the GAEPD, the State will require monitoring at a higher frequency.

The water quality monitoring program required by the District is more extensive than that required by GAEPD, including long-term ambient trend monitoring, dry and wet-weather illicit discharge screening, commercial/industrial inspections, monitoring for the watershed assessment, TMDL monitoring, and biological and habitat monitoring. The District monitoring plan was designed to be a comprehensive effort that would allow for a consistent, minimum effort for monitoring across the planning area, as well as streamline monitoring efforts required for multiple regulatory efforts. The District recommendations are described in Table 20.

TABLE 20
Summary of Local Government Water Quality Monitoring Elements Required by the District
Forsyth County Watershed Protection Plan

Program Element	Frequency	Methodology/Approach
Long-Term Ambient Trend Monitoring	1 baseflow and 3 wet-weather samples (flow-weighted composite) collected during the summer (May–October) and winter (November–April) seasons.	2 stations will each be monitored at the listed frequency 1 Automated sampling – Composite hydrograph sampling triggered by data loggers 2 EW/EDI ¹ composite-grab sampling 3 Clean metals analysis (Method 1669)
Dry Weather Illicit Discharge Screening	Annual inspections	Rotation of sites as necessary based on data collected through water quality sampling
Commercial/Industrial Inspection Program	Annual inspections	Inspection of a minimum of 5% of relevant industries/commercial operations each year
Watershed Assessment Monitoring	As needed based upon application for a new source or expansion of WTP and/or WRF discharge.	Water quality and biological monitoring watershed approach
Monitoring for Assessing TMDL Implementation and Delisting	As specified in the TMDL Implementation Plan	Sampling for 303(d)/305(b) listed constituents
Biological and Habitat Assessments	Every 5 years on a rotating basis	GAEPD/Wildlife Resources Division (WRD) methodology

¹ EW/EDI – Equal Width Integrated and Equal Depth Integrated

² Sampling focused on wet-weather events and, therefore, may not be conducted monthly. A total of approximately 12 sampling events should be conducted in a year.

Source: Metropolitan North Georgia Water Planning District-wide WMP (CH2M HILL, 2003)

Long-Term Water Quality Monitoring

Fourteen locations within the County have been chosen to be sampled: Big Creek (3), Settingdown Creek (2), Four Mile Creek, Six Mile Creek, Two Mile Creek, James Creek, Dick's Creek, Taylor Creek, Sawnee Creek, Brewton Creek, and the Chattahoochee River. Current water quality monitoring locations are shown in Figure 4, and frequency of sampling are listed in Table 21. Samples are gathered on a monthly basis following storm events greater than 0.25 inches within 8 hours. During the sampling stage, height and in-

stream velocity are to be recorded, except for the Chattahoochee River. Existing local gauge information developed by the U.S. Geological Survey (USGS) is then used to estimate flow within the river.

In-situ parameters include dissolved oxygen (DO), temperature, conductivity, pH, and turbidity. Water quality samples are gathered and then sent to a certified laboratory to be analyzed for fecal coliform, total suspended solids (TSS), nitrate-nitrite, total phosphorus (TP), total organic carbon (TOC), dissolved copper, total dissolved solids, and pH. Further information about the relationship of each parameter to watershed activities is provided in the WAMP (CH2M HILL, 2000).

TABLE 21
Minimum Frequency of Stream Sampling
Forsyth County Watershed Protection Plan

Stream	Approximate Sampling Frequency ¹
Big Creek at McGinnis Ferry Rd (BGF-1).	Monthly
Big Creek at Majors Rd (BGF-2).	Monthly
Big Creek at Bethelview Rd. (BGF-3)	Monthly
Dick's Creek at Old Atlanta Rd. (DKF-1)	Monthly
James Creek at Burgess Rd. (JSF-1)	Monthly
Chattahoochee River near McGinnis Ferry Road (CHF-1)	Monthly
Six Mile Creek at Burgess Rd. (SMF-1)	Monthly
Four Mile Creek at Avery Bridge Rd. (FMF-1)	Monthly
Sawnee Creek at Pilgrim Mill (SNF-1)	Monthly
Taylor Creek at Highway 53 (TLF-1)	Monthly
Two Mile Creek at Wallace Wood Rd. (TMF-1)	Monthly
Settingdown Creek at Matt Hwy (SDF-3).	Monthly
Settingdown Creek at Burnt Bridge Rd. (SDF-4)	Monthly
Brewton Creek at Mt. Tabor Rd.(BRF-1)	Monthly

¹ Actual sampling frequency is dependent on storm events.

Biological Assessment

Macroinvertebrate and fish community assessments are conducted at 5 stations that are also sampled for water quality along Big Creek, Dick's Creek, Settingdown Creek, Six Mile Creek, and Two Mile Creek. The procedures will follow the most current version of the draft Standard Operating Procedures for Freshwater Macroinvertebrate Biological Assessment (GADNR, 2004) and Fish Communities in Wadeable Streams in Georgia (GADNR, 2005). Biological monitoring was performed in 1999 and 2005 by CH2M HILL. The County also conducted sampling in 2003 using a different contractor, but the sampling was redone in early 2004 with the help of CH2M HILL to better meet GADNR protocols. The County will conduct biological monitoring again in 2007.

STUDY STATION LOCATIONS

Monitoring procedures include a habitat evaluation of the immediate watershed, substrates, stream width, and general water quality conditions. This is carried out by rating each of 10 metrics used to measure various riparian and in-stream parameters.

Fish communities are sampled using backpack electrofishing, where electricity is used to temporarily stun fish so they can be easily captured using dipnets (GADNR, 2005). Areas are also selected to use a minnow seine for further sampling if the habitat was conducive for seining. Seining is particularly effective in collecting darters, minnows, and other smaller fish generally not as vulnerable to backpack electrofishing. Index scores were derived for each station by rating 13 metrics of fish community structure in 5 broad categories: species richness, species composition, trophic function, species abundance, and physical condition. The 13 metrics integrate attributes of the entire fish community that are differentially sensitive to various levels of stream perturbation.

The procedure for macroinvertebrate collection involves collecting a composite sample from different habitats for analysis and data evaluation. The habitats sampled include coarse particulate organic matter (CPOM)/leaf pack samples, riffle kick net samples, undercut bank sweep net samples, rock and/or log wash samples, sand kick net samples, and aquatic vegetation sweeps. The macroinvertebrate samples are identified to the lowest taxonomic level practical, and the results is used to compute the community, population, and functional metrics (GADNR, 2004). Each metric or index represents a slightly different component of community structure and/or function and provides a measure of biotic integrity.

Etowah River Basin Monitoring Program

Funded by a grant from the United States Fish and Wildlife Service (USFWS), the habitat conservation planning process was triggered when three species of fish in the Etowah River Basin were listed as federally threatened or endangered under the Endangered Species Act. Five additional species are listed by the State of Georgia as rare, threatened, or endangered. As a result, any development activities requiring a USACE permit or Development of Regional Impact (DRI) review must also be coordinated with USFWS, a potentially lengthy process. The HCP proposes to expedite the review process for those projects / developments located in jurisdictions implementing the recommendations found in the final Etowah Habitat Conservation Plan (HCP), as approved by USFWS.

The draft Etowah HCP is being developed by staff from the University of Georgia, Kennesaw State University, and the Georgia Conservancy and a Steering Committee composed of representatives from counties and municipalities within the Etowah River Basin. An Advisory Committee composed of state and federal agencies, non-government organizations (NGOs), and other stakeholders also assists the Steering Committee and ad hoc Technical Committees with scientific and legal research, public education and outreach, and organization of meetings. The Etowah HCP is being developed through a series of technical papers that are presented to committee members for feedback and discussion. Completion and submittal of the draft HCP to the USFWS is projected for the fall of 2006.

Approximately 30 percent, or 70 square miles, of northwest Forsyth County drains to either the Etowah River or one of its tributaries (see Figure 1). Forsyth County is a partner in the development of the Etowah HCP with County leaders and staff members serving on

committees responsible for drafting the HCP, stormwater ordinances, development criteria, and BMP recommendations. As a County partner in the Etowah HCP, Forsyth County is also responsible for monitoring water quality and biotic integrity at 1 out of the 19 predetermined locations within the Etowah River Basin. Other monitoring locations are sampled by the additional counties that occur within the basin. The location monitored by Forsyth County is Settingdown Creek at Highway 369. On a monthly basis, the County samples water chemistry parameters including temperature, dissolved oxygen, pH, conductivity, turbidity, biochemical oxygen demand (BOD), chemical oxygen demand (COD), hardness, total suspended solids (TSS), ammonia, total phosphorous (TP), orthophosphorous (DP), nitrate/nitrite, total nitrogen (TN), total organic carbon (TOC), fecal coliform, *Escharichia coli*, and total metals (that is, cadmium, copper, lead, zinc).

Table 22 summarizes the key points by topic area of the HCP documents published to date. These recommendations are in addition to existing District guidelines, already adopted by the County, and are still in draft format. Upon approval by the USFWS, Forsyth County will consider modifications to their ordinances, development criteria, and BMPs to meet the intent of the HCP in the portion of the County draining to the Etowah River.

In addition to participating in the HCP, Forsyth County has implemented by ordinance (Chapters 8 and 21 of the UDC), the Etowah River Corridor Protection District for the purposes of water supply protection. These measures consist of buffer protection from development, developmental type limitations, building and septic tank restrictions, and the prohibition of solid waste landfills within the river corridor. These measures apply to the 100-foot corridor running parallel to the Etowah River.

TABLE 22
 Summary of Current Etowah HCP Documents (beyond Draft Reports)
Forsyth County Watershed Protection Plan

Topic Area	HCP Document Names	Key Points	Action Required by Forsyth
Better Site Design	Guidelines and Site Design Checklists	Purpose: The goal of these site design guidelines is to reduce the volume of runoff generated by developed areas in order to protect imperiled aquatic species. Better Site Design is used to reduce the total impervious surface area of a new development and is one tool for meeting the HCP stormwater management performance criteria.	TBD
	BSD Ordinance (aka Stormwater Ordinance, see last row of table)	Maximizes pervious area through changes in setbacks, road and sidewalk design, and parking lot regulations and infrastructure.	
	Stormwater Facility Maintenance Problems and Proposed Solutions	Suggests the simplification and encouragement of regulations that allow for cluster development and green space preservation within new developments. Suggests the adoption of County ordinances that will address potential maintenance and jurisdiction issues that may arise in relation to stormwater infrastructure. Suggests the following BMP inspection frequencies and maintenance responsibilities:	

TABLE 22
 Summary of Current Etowah HCP Documents (beyond Draft Reports)
 Forsyth County Watershed Protection Plan

Topic Area	HCP Document Names	Key Points	Action Required by Forsyth															
Better Site Design (Continued)	<table border="1"> <thead> <tr> <th>Owner/Type</th> <th>Minimum Inspection Frequency</th> <th>BMP Maintenance Responsibility</th> </tr> </thead> <tbody> <tr> <td>Facilities serving more than 10,000 sq. ft. impervious surface</td> <td>Annual</td> <td>Owner*</td> </tr> <tr> <td>Facilities serving 5,001-10,000 sq. ft. impervious surface</td> <td>Every 2 years</td> <td>Owner or HOA*</td> </tr> <tr> <td>Facilities serving less than 5,000 sq. ft. impervious surface</td> <td>Every 3 years</td> <td>Owner</td> </tr> <tr> <td>Government-Owned BMPs</td> <td>Annual</td> <td>Government</td> </tr> </tbody> </table> <p>* Government may also choose to accept maintenance responsibility, if desired.</p>			Owner/Type	Minimum Inspection Frequency	BMP Maintenance Responsibility	Facilities serving more than 10,000 sq. ft. impervious surface	Annual	Owner*	Facilities serving 5,001-10,000 sq. ft. impervious surface	Every 2 years	Owner or HOA*	Facilities serving less than 5,000 sq. ft. impervious surface	Every 3 years	Owner	Government-Owned BMPs	Annual	Government
	Owner/Type	Minimum Inspection Frequency	BMP Maintenance Responsibility															
	Facilities serving more than 10,000 sq. ft. impervious surface	Annual	Owner*															
	Facilities serving 5,001-10,000 sq. ft. impervious surface	Every 2 years	Owner or HOA*															
	Facilities serving less than 5,000 sq. ft. impervious surface	Every 3 years	Owner															
Government-Owned BMPs	Annual	Government																
Conservation Subdivision	Technical Report Ordinance	<p>Purpose: Gives developers and landowners the flexibility to cluster development on a portion of the tract while permanently preserving the remaining areas as open space.</p> <p>Site Analysis Map of Primary and Secondary Conservation Areas</p> <p>Follow Randall Arendt's four-step design process to preserve at least 40% of the total tract in the open space.</p> <p>Must require permanent protection of open space.</p> <p>If open space owned by the HOA, membership shall be mandatory for all homeowners.</p>	TBD															
Stormwater Runoff	Development Runoff Study "BSD" Ordinance	<p>Purpose: To manage the quantity and quality of stormwater runoff identified in the Technical Reports to be the largest threat to the imperiled fishes of the Etowah River.</p> <p>Similar to District Model Ordinance, adds language for additional performance criteria in designated Priority Areas.</p> <p>Additional runoff limits are defined by ordinance for those portions of the Etowah identified as either a Priority 1 or Priority 2 Areas or as a Development Node.</p> <p>Priority 1 Areas would require new development to produce no net increase in stormwater runoff over a forested condition. Post development runoff limits are higher for Priority 2 Areas and predetermined Development Nodes</p> <p>In these areas, the runoff limits may necessitate use of Better Site Design, nonstructural stormwater management measures, and structural stormwater management measures that allow for infiltration or evapo-transpiration in order to meet these performance standards.</p> <p>The Etowah HCP Runoff Limits Manual provides technical guidance.</p>	TBD															
Erosion and Sedimentation	Technical Report Standard Operating Procedure for E and S Control	<p>Purpose: To identify the best practices among the jurisdictions of the Etowah Basin and develop these into a "Standard Operating Procedure" (SOP) for all participating counties and municipalities.</p> <p>Would require two pre-construction meetings, semi-monthly reporting, a bonding program, minimum inspection frequency requirements, E and S checklist for building inspectors, and designation of emergency contact for E and S at each development..</p>	TBD															

TABLE 22
 Summary of Current Etowah HCP Documents (beyond Draft Reports)
 Forsyth County Watershed Protection Plan

Topic Area	HCP Document Names	Key Points	Action Required by Forsyth
Stream Crossings and Culvert Design	Technical Report	<p>Purpose: The goal of recommendations is to improve the placement of culverts and road crossings during new construction over streams and rivers. Road crossings and associated infrastructure can serve to fragment fish habitat and populations.</p> <p>Would require bridges over streams draining more than 20 square miles,</p> <p>Crossings over streams draining less than 20 square miles would use bottomless culverts or embedded box or pipe culverts. Perched culverts may not be installed.</p> <p>Channel disturbance and bank erosion would be minimized to full extent possible during installation of infrastructure</p> <p>Variations may be issued when proposed alternatives have no greater impact than the required provisions</p>	TBD
Utility Line Crossings	Technical Report (Draft)	<p>Purpose: To protect instream habitat and reduce bank erosion from utility crossings and their installation.</p> <p>During installation, horizontal direct drilling (HDD) shall be utilized in preference to all other methods when feasible</p> <p>When HDD is not feasible isolation crossings can be made if they do not create excessive erosive forces and if they do not involve the dewatering of streams</p> <p>Open trench construction is prohibited except when it can be shown that alternatives would produce more harm</p> <p>Construction activities would minimize impact of instream and adjacent habitat and all but HDD installation would be prohibited during sensitive life history periods of imperiled species.</p>	TBD
Stream Buffers	Stream Buffer Ordinances (HCP Revisions to District Model Ordinance)	<p>Recommends District communities continue to meet the intent of the District ordinance with minor adjustments.</p> <p>Clarify the definition of a stream.</p> <p>Remove exemption for activities in ROWs</p> <p>Clarify and strengthen variance procedures.</p>	TBD

TBD = To be determined when HCP is finalized.

References

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- Georgia Environmental Protection Division (GAEPD). 2006. *Draft Georgia 2006 303(d) List*.
- Georgia Environmental Protection Division (GAEPD). 2005. *Watershed Assessment and Protection Plan Guidance*.
- Georgia Environmental Protection Division (GAEPD). February 2003a. *Draft Total Maximum Daily Load Evaluation for Seventy-nine Stream Segments in the Chattahoochee River Basin for Fecal Coliform*.
- Georgia Environmental Protection Division (GAEPD). January 2003b. *Chattahoochee River Basin Dissolved Copper TMDLs for Big Creek, Orr Creek, Park Creek, and Utoy Creek*.
- Georgia Department of Natural Resources (GADNR). 2005. *Standard Operating Procedures for Conducting Biomonitoring on Fish Communities in Wadeable Streams of Georgia*. Wildlife Resources Division, Fisheries Management Section.
- Georgia Department of Natural Resources (GADNR). 2004. *Draft: Standard Operating Procedures-Freshwater Macroinvertebrate Biological Assessment*. Environmental Protection Division.

APPENDIX A

Responsible Parties within Watersheds

TABLE A
Responsible Parties within the Same Watersheds as Forsyth County
Forsyth County Watershed Protection Plan

Responsible Party	
Cities and Counties	
City of Cumming Department of Planning and Zoning Scott Morgan 100 Main Street Cumming, Georgia 30040 770.781.2024 s.morgan@cityofcumming.net	Gwinnett County Public Utilities Frank Stephens 75 Langley Dr Lawrenceville, GA 30045 Phone: 770.822.8000 Frank.Stephens@gwinnettcountry.com
Cherokee County Engineering Department Geoffrey E. Morton 130 East Main Street Suite 106 Canton, GA 30114 678.493.6077 gmorton@cherokeega.com Cherokee County Water and Sewerage Authority 391 West Main Street Canton, GA 30114 770.479.1813 Janice@ccwsa.com	City of Canton (See Cherokee County Engineering Department and Cherokee County Water and Sewerage Authority)
City of Holly Springs Administrative Offices Anthony W. Griffin 3235 Holly Springs Parkway Holly Springs, GA 30142 770.345.5536 awgriffin@hollyspringsga.net	City of Woodstock Jarvis Middleton 103 Arnold Mill Road Woodstock, GA 30188 770.592.6036 jmiddleton@ci.woodstock.ga.net
Robert L. Brice Cobb County Water System 660 S Cobb Drive Marietta, GA 30060 770.423.1000 water@cobbcounty.org	James Wells Marietta Water 627 B. North Marietta Parkway Marietta, GA 30060 770.794.5223 jwells@mariettaga.gov
Randy Bowen Dawson County Public Works Dawsonville Business Park Hwy. 9 South 76 Howard Avenue East, Suite 120 Dawsonville, GA 30534 706.344.3501 Ext. 246 rbowen@dawsoncounty.org	City of Dawsonville Water/Sewer Department 415 Highway 53 East, Suite 100 Dawsonville, Georgia 30534 706.265.3256

<p>City of Chamblee (See Dekalb County Water and Sewer) 770.986.5024</p>	<p>Miguel Valentin City of Decatur Leveritt Public Works Building, second floor 2635 Talley St. Decatur, GA 30030 404.377.6198 mvalentin@decaturga.com</p>
<p>City of Doraville (See Dekalb County Water and Sewer)</p>	<p>Marie Woody Fannin County Department of Land Development 400 West Main, Suite 101 Blue Ridge, Georgia 30513 706.632.8361 landdevelopment@fannincountyga.org</p>
<p>Nick Ammons Fulton County Department of Public Works-Surface Water Management Program 141 Pryor Street, S.W. Suite 6001 404.730.7400 Nick.Ammons@co.fulton.ga.us</p>	<p>John Moskaluk City of Alpharetta Two South Main Street Alpharetta, GA 30004 678.297.6200 jmoskaluk@alpharetta.ga.us</p>
<p>Stuart Moring City of Roswell Public Works Roswell City Hall-Main 38 Hill Street Roswell, GA 30075 770.641.3750 smoring@ci.rowswell.ga.us</p>	<p>Lamar Sudderth City of Buford Public Utilities 2300 Buford Highway Buford, GA 30518 770.945.6761</p>
<p>Audrey Turner City of Duluth Public Works 2450 Chattahoochee Drive Duluth, GA 30097 770.476.2454 aturner@duluthga.net</p>	<p>Kaipo Owana, Planning and Development Department City of Sugar Hill 4988 West Broad Street Sugar Hill, GA 30518 (770) 945-6734 Fax: (770) 945-0281</p>
<p>James Miller City of Suwanee Department of Public Works 373 Highway 23 Suwanee, GA 30024 770.945.7034 jmiller@suwanee.com</p>	<p>Betty Lathan Habersham County Water Department P.O. Box 1540 Clarkesville, GA 30523 706.754.8159 hcwsa@hemc.net</p>
<p>Doug Derrer Hall County Public Works and Utilities P.O. Box 1435 Gainesville, GA 30503 770.531.6800 dderrer@hallcounty.org</p>	<p>Adrian Niles City of Gainesville Department of Public Works 770.535.6882 publicworks@gainesville.org</p>
<p>Johnny Thomas City of Flowery Branch Water and Sewer Department P.O. Box 757 Flowery Branch, GA 30542 770.967.6371</p>	<p>Larry Sparks Planning Director City of Oakwood P.O. Box 99 Oakwood, Georgia 30566-0002 (770) 534-2365 Fax: (770) 297-3223</p>

Dudley Owens Lumpkin County Water Authority 99 Courthouse Hill Dahlonega, GA 30533-0540 706.867.6580 dowens@lumplincounty.gov	Larry Coleman Director of Utilities Pickens County 52 N. Main Street Jasper, Georgia 30143 (706) 253-8719
David Hall Water and Wastewater Treatment Supervisor City of Jasper 200 Burnt Mountain Road Jasper, Georgia 30143 (706) 692-9101 Fax (706) 692-9104	Townes County 48 River St. Hiawassee, Georgia 30546-3219 (706) 896-2276 Fax (706) 896-1772
DeKalb County Water and Sewer 1580 Roadhaven Drive Stone Mountain, GA 30083 770.621.7200 wsmail@co.dekalb.ga.us	Clean Water Atlanta City of Atlanta Department of Watershed Management 55 Trinity Avenue Atlanta, GA 30303 404.529.9211 cleanwateratlanta@atlanta.gov
Other Pertinent Authorities and Organizations	
Curt Gervich Etowah Habitat Conservation Plan P.O. Box 287 Acworth, GA 30101 678.801.4013 curt@etowahhcp.org	Upper Etowah River Alliance Robin Dake Rt. 2 Box 104 Eastanollee, GA 30538 706-779-5756 info@etowahriver.org
Upper Chattahoochee Riverkeeper 3 Puritan Mill 916 Joseph Lowery Blvd. Atlanta, Ga 30318 404.352.9828	Lake Lanier Association 615F Oak Street, Suite 100 Gainesville, GA 30501 770.503.7757 lakeinfo@lakelanier.org

APPENDIX B

2006 Water Quality Sampling Plan
