



May 7, 2015

Branch Chief
Watershed Protection Branch
2 MLK Jr. Drive, SW
Suite 1152, East Tower
Atlanta, Georgia, 30334

RE: Proposed Amendments to the Rules for Outdoor Water Use, Chapter 391-3-30

On behalf of the Board of Directors and the members of the Georgia Urban Ag Council, thank you for meeting with and considering input from all interested stakeholders in order to revise and amend the previous drought management rules to incorporate the importance of commerce and the consumer, while creating parameters for managing water use during drought.

The establishment of a “culture of conservation” described in the 2010 Georgia Water Stewardship Act is critical to preserving this resource, but it is equally important to consider recent history (the 2007-2008 drought) as these rules are proposed.

In the most recent drought, local actions taken by many municipalities, counties and utilities to limit or prohibit outdoor water use resulted in devastating economic losses for Georgia’s urban ag industry (the industry is comprised of sod, ornamental, and nursery plant production, as well as outdoor landscape and recreational turfgrass management).

According to a study conducted by the University of Georgia, industry losses totaled:

- More than \$2 billion during this time period (pre-drought annual revenue \$8.2 billion);
- Elimination of more than 40% of the workforce – or 35,000 Georgia jobs.
- Between the chaotic conditions of local actions and the State’s decision to move from Drought Level 2 to Drought Level 4 – with no warning – the losses and impacts were immediate and devastating.

Legislation passed and signed by Governor Perdue in 2010 (SB270 - Water Stewardship Act), included measures to protect outdoor water uses and provide for new drought management rules. The legislature’s **intent** was to prevent a repeat of the economic consequences of the 2007-2008 drought and to provide clarity for these new drought management rules at all drought (and non-drought) levels. This included 13 exempted uses that would help achieve the intent of this law.

While establishing necessary references in the proposed drought management rules, we suggest the following:

Georgia Urban Ag Council
P.O. Box 817 Commerce, GA 30529
P: 800.687.6949 F:706.336.6898
www.urbanagcouncil.com

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- **Stating the 13 outdoor water use exemptions allowed for in the Water Stewardship Act at each of the drought levels**, or as a separate supplemental guide for end users, to improve compliance and to further reduce confusion about outdoor water use rules by consumers and businesses.
- By referencing the 13 exemptions in the Water Stewardship Act, consumers and the media can reference and promote these water use allowances, thus allowing for the new drought management rules to serve as both a resource for consumers and a regulatory framework for permit holders.
- Clarification of these rules (in layman’s terms), will alleviate uncertainty and chaos experienced in former droughts. The Georgia Urban Ag Council will prepare a guidance document, with input from water providers and other resources, for the end users’ reference. We would like to offer this resource for EPD’s endorsement upon approval of the new drought management rule.

While much of the proposed drought management rule captures the 13 exemptions provided for in the 2010 Water Stewardship Act, **there are notable deviations made at the highest drought level**. The intent of Georgia lawmakers (in 2010) **was to protect such water uses at all times, including drought**.

These protections, guaranteed by the **intent** of the law, are necessary in order to avoid a repeat of the economic catastrophe suffered industry-wide during the last drought. We are committed to working with EPD and other stakeholders to firmly establish these intentions in Georgia law so that they will not be subject to regulatory alterations in the future. Our industry and Georgia consumers need to be confident that these provisions are established in law and not subject to use restrictions except in the case of an extreme emergency.

The entire agriculture industry prioritizes the identification and promotion of efforts to encourage environmental stewardship. Water conservation is certainly an essential component of this stewardship and Georgia’s urban ag industry – growers, managers, service providers and many other industry sectors, have proven to be ahead of the curve, and continue to look for ways to foster the “culture of conservation” shared throughout our state. Thank you again to EPD for your diligence in this process and for your consideration of our comments. Please feel free to contact us when we can be of assistance.

Sincerely,

A handwritten signature in cursive script that reads "Mary Kay Woodworth".

Mary Kay Woodworth
Executive Director
Georgia Urban Ag Council (UAC)

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