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A SECTION OF THE GEORGIA ASSOCIATION OF WATER PROFESSIONALS

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Mr. Cash:

The Georgia Water Wise Council (GWWC) is a Section of the Georgia Association of Water Professionals, which brings water industry and green industry professionals, as well as Environmental NGOs together to promote sound water efficient policy and practices in Georgia. We are pleased to have the opportunity to provide some comments that are supported by our diverse membership regarding the current process to update Georgia's Drought Rules. We recognize that the staff of GAEPD has been given a difficult task to accomplish, incorporating so many varying interests with an overriding goal of preserving economic viability and natural resources simultaneously, in the event of a resource emergency. We also recognize EPD's staff constraints and the tight timeline that has been outlined.

GWWC convened a conference call with representatives of all of our member categories to discuss drought planning and come to a consensus on some key considerations we feel will make the drought plan stronger. First, we would strongly encourage EPD to ensure communication channels remain open and inclusive of the many interested and affected stakeholders during the rule update process. Many of the call participants had not been included in initial communications about the drought rule revision. The drought rule will be stronger if the stakeholders are a part of the process and their sector specific knowledge is utilized to make a realistic and enforceable plan.

Georgia is fortunate that many states have gone before us and have updated drought rules and plans. Recently the National Drought Mitigation Center has updated their website to include a drought resource planning by state webpage. This makes researching other state's plans much easier. The resource can be found at:

<http://drought.unl.edu/Planning/PlanningInfobyState.aspx>. GWWC strongly recommends the EPD review some of the recent updates to drought plans, for example Texas, when preparing Georgia's draft drought rules. Some of these plans have a comprehensive system of climatic and hydrological triggers that are incorporated into their plans, and may serve to inform Georgia's process of determining appropriate triggers.

The Drought Response Committee is essential to the successful evaluation and declaration process during a drought. GWWC recommends the structure of the drought response committee be reevaluated during the rule update. We would recommend a committee with regional representation, based upon watersheds or river basins rather than political jurisdictions. This regional representation is consistent with state water planning and would result in more accurate declarations. We would also recommend that the committee reflect the sectors affected by drought in each region. We realize this might make the committee more difficult for EPD to convene and manage but there are options. If drought is only affecting a portion of the state only those representing the affected area would need to participate. If the entire committee needed to be convened then a conference call with some web based meeting application would be a viable option.

Drought Response strategies should be clearly defined and should apply to the basin or watershed affected, and not delineated solely along political boundaries. Additionally, all stakeholders should be taken into account by the drought response plan, including power generation, industrial permittees, and agriculture, as well as the municipal sector. The resources affected by drought are shared resources and therefore, preserving them during drought is a shared responsibility. The past drought rules placed all of the plan implementation and mitigation strategies solely upon municipal providers and those that depend upon municipal supply. This causes a disproportionate amount of harm to those entities, while not providing a comprehensive resource-wide response strategy.

Regarding the drought triggers, GWWC would again recommend reviewing examples from other states. In addition, it is important that the triggers are evaluated on a timely basis. The prompt evaluation, coupled with climate projections, can be utilized to make drought declaration decisions. Ideally the review process would allow for an advanced notification system that would allow the affected communities to prepare information and implement mitigation strategies and drought level plans prior to the level being implemented. In the past the committee has convened and the drought level has been activated immediately. We would recommend that during times of decreased rainfall the triggers are closely monitored allowing drought levels to be predetermined, with enough time to permit communication about the conditions and the results. This might be a one-three week window, depending upon conditions. Advanced notice would also give those systems seeking a variance time to apply in advance to lessen the confusion of implementing two separate levels in their area within a few weeks. When considering triggers we would also recommend evaluating the triggers for stepping back drought levels after the crisis. In the previous plan it required all triggers to be in the normal range for three consecutive months. When drafting new rules perhaps consideration could be given to a more incremental improvement process that results in levels being partially stepped back.

GWWC does understand variances are needed and some flexibility is required in the drought plan. We would recommend that the variance procedure is spelled out, both what is required to gain a variance and what is allowed within the variance. Though we understand that this is necessary, we would recommend that there is a need for some consistency within the process. It is a challenge for those who depend upon municipal supply for their business activities to have significantly different restrictions “across the street “from each other.

Lastly GWWC feels strongly that communication of the drought plan, drought declarations, and the current drought status and impacts should be more robust. Perhaps EPD could identify a few key people in each region to communicate about drought. The notification process for drought declaration needs to be formalized. More advanced notice before triggering the response would allow for this process to occur. GWWC is unique because of the varied perspectives represented within the organization. We would be willing to assist EPD with drought communications. As the state-wide organization representing conservation and efficiency in the state and with our varied participation, as well as our position within the Georgia Association of Water Professionals, we are an available resource to EPD on this issue and are willing and prepared to assist.

Again we appreciate and value the opportunity to be able to participate in this vital process.

Sincerely,

The Georgia Water Wise Council