



Sent via email to Bill Towson at Bill.Towson@dca.ga.gov on December 10, 2018.

TO: Georgia Department of Community Affairs, 2018 International Plumbing Code Task Force

DATE: December 10, 2018

RE: Georgia State Minimum Standard Plumbing Code on Plumbing Fixture Water Efficiency

Dear Department of Community Affairs,

As a steadfast advocate for sustainable building practices and responsible resource use, Southface recognizes the importance of advancing water efficiency standards in Georgia. We write to express our strong support of the proposed amendment to the 2018 International Plumbing Code (IPC) submitted by the Metropolitan North Georgia Water Planning District (MNGWPD) on October 30, 2018. Given currently available technologies, MNGWPD's recommendations are reasonable advancements in water efficiency standards, and it is our understanding that the resulting water, energy, and financial savings will be significant.

The proposed further-reduced flow rates for showerheads, (private) lavatory faucets, and kitchen faucets will save consumers money and continue to conserve our state's limited water resources. As Georgia's population continues to grow, conserving water will be of increasing importance to our economy and quality of life.

In addition, saving water is vitally important to Georgia's efforts to conserve energy. Energy generated by power plants across the state is used to clean, treat, and distribute water to our homes and businesses. Electricity and gas are used to heat water in our homes and businesses for everyday use. As described in Attachment C of the Code Amendment Form submitted by MNGWPD there will be significant financial savings to home and business owners as a result of the reduced energy and water use achieved.

On behalf of Southface I respectfully request that the 2018 IPC Task Force approve the amendment submitted by MNGWPD, and want to thank you very much for your consideration. Please do not hesitate to contact us if you wish to discuss any of these points further.

Kind regards,

A handwritten signature in black ink that reads "Lisa Bianchi-Fossati".

Lisa Bianchi-Fossati
Policy Director, Southface



December 21, 2018

Submitted via email: Bill.Towson@dca.ga.gov

Bill Guinade, Chairman
2018 International Plumbing Code and
International Swimming Pool and Spa Code Task Force
c/o Bill Towson
Department of Community Affairs, Central Office
60 Executive Park South, NE
Atlanta, GA 30329

Re: High Efficiency Plumbing Fixtures Flow Rates Amendments

Dear Mr. Guinade and Task Force members:

The Georgia Water Coalition (GWC) thanks the 2018 International Plumbing Code and International Swimming Pool and Spa Code Task Force for the opportunity to provide comments on proposed Plumbing Code amendments.

The GWC is comprised of over 250 organizations, representing thousands of Georgians and encompassing conservation organizations, farmers, homeowners and lake associations, business owners, hunting and angling organizations, professional associations, and religious groups. The GWC's mission is to protect and care for Georgia's surface water and groundwater resources, which are essential for sustaining economic prosperity, providing clean and abundant drinking water, preserving diverse aquatic habitats for wildlife and recreation, strengthening property values, and protecting the quality of life for current and future generations. A copy of the GWC's most recent membership list is attached.

The GWC advocates for the establishment of common-sense water management policies and to ensure that water conservation and efficiency comprise the cornerstone of water supply planning. Accordingly, the GWC supports the amendments to the Plumbing Code sections 202 and 604.4 as proposed by the Metropolitan North Georgia Water Planning District.

Increasing the water efficiency of showerheads and faucets will allow Georgia to remain a regional leader in water efficiency. Moreover, the resulting water savings will benefit the entire state, including coastal areas where saltwater intrusion into aquifers is a risk and areas under scrutiny in the tri-state water wars.

In sum, we strongly encourage the Task Force to recommend full adoption of the proposed amendments to the Plumbing Code.

If you have any questions, please contact April Lipscomb, Staff Attorney, Southern Environmental Law Center: alipscomb@selcga.org or (404) 521-9900.

Sincerely,

Georgia Water Coalition

Attachment





GEORGIA WATER COALITION

ABAC Forestry and Wildlife Club
AGrow Tech
Albany Georgia Audubon Society
Altamaha Riverkeeper
Alternative Energy Southeast
American Cane Society
American Fisheries Society – Georgia Chapter
American Rivers
Amy's Green Cleaning
Anthony Shoals Preservation Group
Apalachicola Riverkeeper
April Ingle Consulting
Association Management Services
Athens Land Trust
Atlanta Audubon Society
Atlanta Coyote Project
Atlanta Water Gardens, Inc.
Atlanta Whitewater Club
Bee Natural, Inc.
Berkeley Lake Homeowners Association
Bike Athens
Blue Heron Nature Preserve
Broad River Outpost
Broad River Watershed Association
BSA Troop 1134
Burnt Fork Watershed Alliance
Camden County Land Trust
Captain Stan's Smokehouse
CCR Environmental
Cedar Creek RV and Outdoor Center
Center for a Sustainable Coast
Central Savannah River Land Trust
Chattahoochee Nature Center
Chattahoochee Parks Conservancy
Chattahoochee Riverkeeper
Chattahoochee River Warden
Chattooga Conservancy
Cherokee Transitions Green
Citizens for Clean Air and Water
Citizens for Environmental Justice
City of Porterdale
Clean Coast
Clear Rivers Chorus
Coastal Georgia Travel
Cochran Mill Nature Center
Compassion in World Farming

Concerned Citizens Against Residential Gun Ranges
Concerned Neighbors of Wayne County
Conserve America
Coosa River Basin Initiative
Creative Earth
Creative Solar USA, Inc.
Deep South Cherokee Keetoowah Foundation
DeKalb County Soil & Water Cons. District
Dunham Farms
Earthkeepers & Company
Earth Equity Advisors
Earth Ministry, NW Unitarian Universalist Congregation
East Atlanta Community Assoc.
Elohee Center, Inc.
Ens & Outs, Unitarian Universalist Congregation of Atlanta
Environment Georgia
Environmental Community Action, Inc.
Environmental Defense Fund-SE Region
Ewing Irrigation - Covington
ezClearWater.com
Fall-line Alliance for a Clean Environment
Fall Line South Field Institute
Fayette Adopt-a-Stream
Fishsport
Flint Riverkeeper
Forest Guild
Fox Environmental
Friends of Barber Creek
Friends of Georgia, Inc
Friends of McIntosh Reserve
Friends of the Apalachee
Friends of the Savannah River Basin
Friends of South Newport River
Garden Club of Georgia, Inc. Laurel District
Cumming Garden Club
Druid Hills Garden Club
Richmond Hill Garden Club
Garden*Hood
Georgia Bass Chapter Federation

Georgia Canoeing Association, Inc.
Georgia Coalition for the People's Agenda
Georgia Coalition of Black Women
Georgia Conservation Voters
Georgia Forest Watch
Georgia Interfaith Power and Light
Georgia Kayak Fishing
Georgia Lakes Society
Georgia Land Trust & Alabama Land Trust
Georgia Onsite Wastewater Association
Georgia Poultry Justice Alliance
GeorgiaRiverFishing.com
Georgia River Network
Georgia River Survey
Georgia Rural Urban Summit
Georgia Watch
Georgia Wildlife Federation
Georgia Women (And Those Who Stand With Us)
Georgia's Women's Action For New Direction (GA WAND)
GigaWord
Global Elite Properties, LLC
Glynn Environmental Coalition
Graci's Garden Center
Greater Apalachee River Community
Greening Forward
GreenLaw
Harrison Design Associates
Highchem America
Historic Piedmont Scenic Byway
Hiwassee River Watershed Coalition
Hydro Logical Solutions, LLC
Imke Lass Photography
Initiative to Protect Jekyll Island
Interface, Inc.
Izaak Walton League of America- Greater Atlanta Chapter
J. Galt & Associates
Jackson Lake Homeowners Association
Junior Bass Busters
Keep Brantley Beautiful and Litter Free
Keller Williams Realty, Lanier Partners
Lake Blackshear Watershed Association
Lake Hartwell Association



GEORGIA WATER COALITION

258 Partners November 29, 2018

Lake Homeowners Alliance
Lake Oconee Property Owners' Association
Lake Oconee Water Watch
Lake Yonah Association
LAND Architect Studio
League of Women Voters of Georgia
Len Foote Hike Inn, Inc.
Litter Control, Inc
Little Mountain Water Association
Live Thrive Atlanta
Lula Lake Land Trust
Lumpkin Coalition
Madison-Morgan Conservancy
Mainspring Conservation Trust
Martins Landing Foundation
McCrary and Company
Melaver McIntosh
Middle Chattahoochee River Stewards
Mitigation Management
Mountain Park Watershed Preservation Society
National Black & Latino Council
National Wildlife Federation
Neighborhood Planning Unit – W Atlanta
New Echota Rivers Alliance
No Ash At All
NOCRAP (Newly Organized Citizens Requesting Aquifer Protection)
Norris Lake Community Benefits Corporation
North American Native Fishes Association
North Georgia Trout Online
Nuclear Watch South
Oceana
Ochlockonee River Water Trail
Ocmulgee Outdoor Expeditions
Oconee River Land Trust
Ogeechee Audubon Society
Ogeechee Riverkeeper
Okfenokee Adventures
One Entertainment Productions
One Hundred Miles
One More Generation
Our Santa Fe River, Inc.
Paddle4Tomorrow
Paleobot Consulting
Patagonia Atlanta

Percussion Campaigns + Communications
Peter T. Klein Realty Advisors LLC
Peter McIntosh Photography
Phillips Seafood
Phinzy Center for Water Sciences
Presbytery of Greater Atlanta
Rabolli Environmental, Inc.
Rain Harvest Company, Inc.
Ryan Taylor Architects
Sandy Springs Environmental Project
Sapelo Sea Farms
Satilla Riverwatch Alliance & Satilla Riverkeeper
Santee-Nacoochee Community Association
Savannah-Ogeechee Canal Society, Inc.
Savannah Coastal Ecotours
Savannah Riverkeeper Broad River Branch Lower Sav River Alliance
Savannah Tree Foundation
Save Lake Oconee's Waters (SLOW)
Save Our Rivers, Inc.
Selah Communications
Sierra Club- Georgia Chapter
Silentdisaster.org
SK Collaborative
Small Carpenters at Large
Snake Nation Press, Inc.
Soenso Solar
Solar Crowd Source
Solar Tyme USA, LLC
Solomon's Minds
Soque River Watershed Association
South Atlantans for Neighborhood Development
South Fork Conservancy
SouthEast Adventure Outfitters
Southeast Green
Southern Alliance for Clean Energy
Southern Conservation Trust
Southern Environmental Law Center
Southern Wings Bird Club
SouthernRiverFishing.com

Southface Energy Institute
South River Watershed Alliance
South Wings: Conservation Through Aviation
St. Marys EarthKeepers, Inc.
St. Marys Riverkeeper
Stack & Associates, P.C.
Storm Water Systems
Stripling, Inc.
Surfrider Foundation - Atlanta Chapter
Sustainable Atlanta
Tallulah River Watershed Council
The Barn Group Land Trust
The Concerned Citizens of Shell Bluff
The Dolphin Project
The Erosion Company (TEC)
The Original Rainwater Pillow
The Outside World
The Rain Barrel Depot
The Rain Saver
The River Line Historic Area
The Victor Firm, LLC
The Wilderness Society
Tredeau Design
Trout Unlimited - Georgia Council
Turner Environmental Law Clinic
Unicoi Outfitters
United Nations Association – Atlanta
Upper Etowah River Alliance
Upper Oconee Watershed Network
Upper Tallapoosa Watershed Group
U.S. Green Building Council, GA Chapter
Watershed Alliance of Sandy Springs
WaterSmart Software
Water is Life West GA
Water Protectors
Watershed Sustainability
Wayne Morgan Artistry
West Atlanta Watershed Alliance
West Point Lake Advisory Council
West Point Lake Coalition
White Oak Hills Neighborhood Association
Woodbine Woman's Club
WWALS-Suwannee Riverkeeper
Yellow Bluff Plantation
Yellow River Water Trail



Keeping Watch Over Our Waters

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December 31, 2018

Bill Guinade, Chairman
2018 International Plumbing Code and International Swimming Pool and Spa Code Task Force
c/o Bill Towson
Department of Community Affairs
Central Office
60 Executive Park South, NE
Atlanta, GA 30329

Submitted via email to: Bill Townsend, Bill.Towson@dca.ga.gov

Dear Mr. Guinade and Task Force members,

Chattahoochee Riverkeeper thanks the 2018 International Plumbing Code and International Swimming Pool and Spa Code Task Force for the opportunity to comment on proposed code amendments.

Established in 1994, Chattahoochee Riverkeeper (CRK) is an environmental advocacy and education organization with more than 8,600 members dedicated solely to making the Chattahoochee River a sustainable resource for the five million people who depend on it. Our mission is to advocate and secure the protection and stewardship of the Chattahoochee River, its lakes, tributaries and watershed, in order to restore and preserve their ecological health for the people and wildlife that depend on the river system.

CRK supports the amendments to Plumbing Code sections 202 and 604.4 as proposed by the Metropolitan North Georgia Water Planning District.

CRK supports the proposed amendments because:

1. The proposed amendment is a strategy CRK has historically supported. Since 2011, CRK has produced *[Filling the Water Gap: Conservation Successes and Missed Opportunities in Metro Atlanta](#)* in 2011 and 2012 to outline local water conservation efforts within the 15-county metropolitan Atlanta region. The goal of this report is to highlight successes and opportunities to advance water conservation and efficiency in the Chattahoochee River basin and beyond. Among the 2012 recommendations, CRK advocated for fixture retrofits and installation of low flow fixtures to reduce water consumption. [see page 15]
2. The proposed amendment will make Georgia a sustainable leader in the field of water conservation and efficiency. The Georgia Water Stewardship Act represented a major step forward with statutory requirements for utilities to complete annual water loss audits

and establish water loss control plans, and for changes to the plumbing code for toilets, urinals, faucets and showerheads. Additional revisions to the code will build on this precedent and enhance Georgia's national reputation when it comes to water conservation and efficiency.

3. The proposed amendment is good for the Chattahoochee River. When we withdraw less water for consumptive use, we leave more water in the river for downstream communities, for fish and wildlife, and we increase the amount of water available for waste water assimilation. CRK maintains an office in LaGrange, operates a floating classroom on West Point Lake that served thousands of students in 2018, and monitors water quality in Columbus and downstream. We understand the connection between upstream withdrawals for water supply, downstream river flows and overall water quality.

In conclusion, CRK supports the proposed amendment because it aligns with CRK's advocacy efforts, is an example of good public policy for Georgia and is good for the Chattahoochee River.

If you have any questions, please let me know.

Sincerely,



Dr. Christopher J. Manganiello
Water Policy Director
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