



Sent via email to Bill Towson at [Bill.Towson@dca.ga.gov](mailto: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](mailto: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](mailto: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

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](mailto: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  
[cmanganiello@chattahoochee.org](mailto:cmanganiello@chattahoochee.org)  
404.352.9828 x. 15

January 3, 2019

Attn: 2018 International Plumbing Code Task Force  
Office of Construction Codes and Industrialized Buildings  
Georgia Department of Community Affairs

Re: Georgia Plumbing Code and ASHRAE Standard 188

To Members of the 2018 International Plumbing Code Task Force:

I am writing on behalf of the local ASHRAE Atlanta Chapter to register our support for the amendment to Section 604.1 of the 2018 International Plumbing Code proposed by the Georgia Department of Public Health (DPH). The amendment calls for the design of water distribution systems to include *Legionella* risk management measures in accordance with ASHRAE Standard 188.

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its 56,000 members worldwide, including over 1,200 members here in Georgia, focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

One of the standards, ANSI/ASHRAE Standard 188 – *Legionellosis: Risk Management for Building Water Systems*, first published in 2015 and revised in 2018, is the result of over ten years of development and research from engineers, public health officials, and industry representatives. Legionellosis refers to illnesses caused by the bacterium *Legionella*, which can be severe; in Georgia, nine percent of 172 reported cases in 2017 were fatal. Standard 188 establishes design requirements to prevent *Legionella* colonization, amplification, and dispersal in the water systems of new buildings, renovations, or additions or modifications to existing buildings.

According to the Georgia DPH, several Legionella outbreaks in Georgia have been associated with potable water systems at non-healthcare facilities, which are not currently addressed by existing regulations. The proposed amendment would require that all new buildings have Water Management Programs to address the entire building water system, reducing the risk of future Legionella outbreaks in our state.

To better protect the health, safety, and wellness of people in Georgia, ASHRAE Atlanta strongly supports the inclusion of Standard 188 minimum risk management requirements in the state plumbing code and encourages the Task Force to approve the amendment to Section 604.1 from the Georgia DPH.

Sincerely,



Meghan McNulty, PE  
Government Affairs Committee Chair  
ASHRAE Atlanta Chapter  
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