



Metropolitan North Georgia Water Planning District

40 Courtland Street NE | Atlanta, Georgia 30303

James A. Capp
Chief, Watershed Protection Branch, EPD
2 Martin Luther King Jr. Drive, Suite 1152 East
Atlanta, Ga 30334

September 5, 2014

Re: Effective Drought Response Strategies

Dear Mr. Capp:

These supplemental comments on EPD's July draft drought rule have been prepared by the Metropolitan North Georgia Water Planning District (District) in coordination with a number of our member governments and water providers. The intent of these comments is to provide EPD a concrete set of drought response strategies that show promise in ensuring a modest reduction in water use during times of drought. We are confident that inclusion of this menu of practices in EPD's drought rule will help ensure a modest reduction in water use during times of drought consistent with O.C.G.A. 12-5-8.

As we stated in our August 19th letter, the most effective drought response strategies are based on local system flexibility in the context of a set of state preferred approaches. These strategies, cognizant of a water system's specific circumstances, have been developed from a perspective of what can be done, rather than what arbitrary percentage of water use reduction must be achieved by a select few. Thank you for your consideration of this additional input, we look forward to continuing to work with EPD during the development of the draft drought rule.

General Comments and Intent

The District agrees with EPD that in times of severe drought modest temporary reductions to water use can – and must -- be made in order to avoid circumstances where systems risk running out of water. However as you know, demand management is intrinsically complex. Therefore achieving these ends is not a simple matter of requiring any one particular drought response strategy. As underscored by Bill Ziebertz, a principal author of several chapters of AWWA's M1 Manual, Principles of Water Rates, Fees, and Charges, in his analysis submitted by the District to EPD on August 19, 2014, "other than concrete measures such as changing fixtures, [demand management] is non-mechanical and non-linear, and even when success is attained, it is often unreproducible." In light of this complexity, EPD's drought rule must be structured to allow for the inherent variability in local operational, policy, billing, and communications procedures among utilities. The rule should therefore, in keeping with these

recommendations, allow for system flexibility in the implementation of self-selected drought response strategies.

Drought Response Strategies

As discussed in both our August 19th letter and Mr. Zieburz's analysis, while surcharges are useful for some utilities in some circumstances, they can be a very negative option for others, especially those with robust conservation programs and tiered rate structures such as those in the District. Therefore, EPD should remove this provision from the draft rule, or at a minimum clarify EPD's intent and identify drought surcharges as a non-mandatory option for systems with tiered conservation rates.

Regarding effective drought response strategies, there is no question that the rule needs to allow for system flexibility in the implementation of self-selected practices. However, it is equally important that all water users take some meaningful action in response to each of the established drought declaration levels. The most effective way to accomplish these ends is through a menu-based approach to the selection and implementation of drought response strategies as proposed below.

- Definition
 - Drought response strategies are those actions undertaken by a permittee after, or in anticipation of, a drought declaration. Such actions are intended to yield a modest reduction in water use during times of drought while assisting to avoid circumstances where systems risk running out of water.
- When EPD declares a drought, permittees shall implement the following drought response strategies:
- Drought Level I
 - Provide notice regarding drought conditions and drought specific public-service messages in one or more of the following ways: newspaper advertisements, bill inserts, website homepage, social media, notices in public libraries; and
 - Select and implement any one additional practice from the drought response strategies menu.
- Drought Level II
 - Maintain all drought response strategies implemented in Drought Level I. In the event Drought level II is declared without Drought Level I having been declared, permittees shall implement all practices as called for in the Drought Level I section above; and
 - Limit watering days and times to two days a week on an odd even schedule (e.g. Wednesday and Saturday, even addresses. Thursday and Sunday, odd addresses); and
 - Select and implement any two additional practices from the drought response strategies menu; and
 - Submit monthly reports to EPD detailing drought response strategies the system has selected, the extent of implementation, and enforcement strategy, if any.
- Drought Level III

- Maintain all drought response strategies implemented in Drought Level II. In the event Drought level III is declared without Drought Level II having been declared, permittees shall implement all practices as called for in the Drought Level I and II sections above; and
 - Select and implement any three additional practices from the drought response strategies menu.
- Emergency Drought Level. Despite the forgoing drought levels, the state recognizes the potential for extremely severe drought events beyond that which is contemplated in Drought Level III. In those rare emergency circumstances, the following shall be implemented:
 - Select and implement all practicable drought response strategies. Practicability shall be determined by each individual permittee; and
 - Total ban on outdoor water use, other than essential uses; and
 - The prioritization of water uses provided in 391-3-2-.04 and 391-3-6-.07:
 - 1) emergency facilities for central life-support measures;
 - 2) domestic and personal uses including drinking cooking washing sanitarian health-related;
 - 3) farm uses;
 - 4) industrial uses;
 - 5) other uses such as lawn sprinkling, noncommercial car washing garden watering etc.;
 - 6) outdoor recreational uses.
- Drought Response Strategies Menu. Note: In the event an emergency drought is declared, all applicable strategies provided in this menu are superseded by the total ban on outdoor water use (other than essential uses) provided for in the Emergency Drought Level section above.
 - Public education campaign (beyond the minimum notice and public service messages associated with Drought Level I)
 - Pool cover requirements
 - Ban on non-recirculating fountains
 - Ban on washing down of hard surfaces unless necessary for public health and safety
 - Government properties stop discretionary watering of non-park properties
 - Suspension of street cleaning program
 - Suspend flushing program unless needed for public health/water quality
 - All outdoor water use shall be with hoses equipped with an automatic shutoff
 - No charity carwashes unless held at a carwash facility
 - Car washing at home banned
 - Glasses of water provided to customers only upon request at restaurants
 - Builder's exemption from mulching as otherwise required by erosion and sedimentation regulations, until conditions improve
 - Distribute retrofit kits and water saving devices to residential users (shower heads, leak dye tabs, toilet tank displacement devices, hose shut off nozzles, etc.)
 - Targeted technical assistance outreach to high users to assist with reductions
 - Reduce system pressure
 - Conduct water loss audits and implement leak detection and repair based on prior audits
 - Implement or have implemented a drought surcharge or tiered conservation rates

- Impose monetary penalties or terminate water services to customers to reduce outdoor water waste (excessive application, outdoor leaks, and improper irrigation)

Again, we appreciate your consideration of these supplemental comments. EPD should continue its deliberative approach to the development and refinement of the draft drought rule. Based on discussions we've had and letters we have seen to date, we hope EPD will consider a number of refinements to the rule, including those we've provided here. In light of these refinements, it would be beneficial if stakeholders had an additional opportunity to review and comment on the revised draft rule prior to the DNR Board's consideration and official public comment period. The District looks forward to continuing its work with EPD during the development of the draft drought rule.

Sincerely,



Mayor Boyd Austin
District Chair



Katherine Zitsch, PE, BCEE
District Manager