



Plumbing & Mechanical Association of Georgia

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The Plumbing & Mechanical Association of Georgia, upon reviewing the *Georgia Water Resources: a Blueprint for the Future* regarding the “Vision for Comprehensive Statewide Water Planning,” would like to offer its opinion of the synopsis of the draft rule.

The plan has four major components:

- Guiding policies for water quantity and water quality management;
- Provision for assessment of the capacities of our water resources;
- A “toolbox” of management practices; and
- Provisions for regional planning to select the management practices that best fit the resource conditions and uses in different regions throughout the state.

It is the third component to which we would like to address our comments. It seems that, if through conservation the quantity of water needs is reduced, this would greatly help in the other three components of the plan. The draft states the issue quite well:

“The first priority for the implementation must be conservation-related water management practices that effectively reduce our water demands. Current statewide water conservation requirements can be dramatically enhanced. While the state encourages the development of conservation plans, the state does not require that these plans be implemented. Even when conservation plans are voluntarily implemented by the water user, the results are not always evaluated for their effectiveness. In addition, conservation plans do not equitably address all water use sectors, including municipal, agricultural, and industrial.”

The draft goes on to further state, “the state must develop a ‘toolbox’ of water conservation practices that can help Georgians meet conservation goals.”

“As we stated in the *Draft Metropolitan North Georgia Water Planning District Water Conservation Action Item: Retrofit of Older, Inefficient Plumbing Fixtures* dated August 29, 2005 the District conducted a study of over 100 water conservation measures. Ten of the most cost effective measures were chosen and after reviewing the draft of the “synopsis of draft rule” we noticed that only seven of the ten measures were included in the draft. In rule section 760-1-1-.08 Water Demand Management Practices – 760-1-1-.08(2)(d)(i) is concerned with water audits; section 760-1-1-.08(2)(d)(ii) conservation pricing; 760-1-1-.08(2)(d)(vi) sub-unit meters in new multi-family buildings; 760-1-1-.08(2)(e)(iv) water system leak detection and repair; 760-1-1-.08(2)(d)(v) rain sensor shutoff switches for new irrigation systems; and rule section 760-1-1-.08(2)(a)(ii) could be taken as the implementation of education and public awareness programs, however we would like to see this stated in a more defined fashion. The use of the word “guidance” could be construed in several different definitions and not related to Education and Public awareness programs.”

The conservation measure we feel is the most important “tool” has been left out of the draft and we believe it should be included based on the District’s research. This is the retrofitting of older, inefficient plumbing fixtures. We base our opinion on the following facts:

- 1) 70 % or over 1 million homes in just the Atlanta area were built before 1993 with older, inefficient plumbing fixtures. This does not include older homes in other areas of the state;
- 2) 43% of water usage is by single family homes;
- 3) In an average home, the toilet represents 24% of the household usage, the shower 17%, faucets 11% and leaks 9%; and
- 4) Savings of 24 MILLION GALLONS per day can be achieved by either replacing or retrofitting these fixtures.

We know that municipalities that have implemented these types of retrofitting programs have saved million of gallons of water a day. We also understand that we need to use every “tool” available to us to manage our water resources. We still believe in our statement to the Water Council that “we must worked together to manage our water resources so that we not only protect the health and well being of Georgia citizens but we also must ensure that current generations have access to adequate supplies of quality water that support both human needs and natural systems.” It is due to this belief that we are asking you to include the retrofitting of older, inefficient plumbing fixtures as one of the tools in the water conservation “toolbox” under rule section 760-1-1-.08 Water Demand Management Practices.