

April 20, 2021

Dear Senator Peeler and Senators Alexander, Hutto, Johnson, and Senn of the S. 2 Select Subcommittee of the Medical Affairs Committee,

On behalf of The Nature Conservancy's 10,000 members in South Carolina, we write to offer comments on S. 2. Our organization collaborates with private and public partners, including DNR, to achieve our mission. Securing freshwater for people and nature is at the top of our priorities. As you all know, our state must sustain its water supplies to meet needs for community drinking water, industries and business, and recreational pursuits. Thanks to the General Assembly's support and DNR's leadership, South Carolina's water planning process is well underway. We are pleased to have the opportunity to serve alongside other stakeholders on the State Water Planning Process Advisory Committee (PPAC) as well as on the River Basin Council for the Edisto River as part of that process. We are similarly encouraged by DNR's high prioritization of ongoing water planning work reflected in their budget request for FY21-22 and hope the General Assembly will see fit to continue its investment by appropriating those funds accordingly.

The Conservancy appreciates and respects legislative efforts to strengthen and improve how state government functions, which we recognize as the well-intentioned spirit and impetus for S.2. However, we are particularly concerned about the element of the proposal that would shift the state's water planning role from the S.C. Department of Natural Resources (DNR) to a new Department of Environmental Services (DES) for the following reasons:

- Reorganization of water science and planning into a new DES, while well-intentioned, does not adequately take into consideration the intrinsic connection between water resources and DNR's conservation and land protection work, among other programs managed by DNR's staff experts.** This multidisciplinary team of state scientists and resource managers functions collaboratively, both internally and externally with partners, like The Nature Conservancy. In our long-standing experience working alongside the dedicated team at DNR, we submit to you that managing South Carolina's water resources is a far more interactive effort than simply permitting and regulating. To reduce the work to those functions primarily misses the value in the ability of DNR staff to create innovative approaches to resources management. By effectively combining consideration of water science, climate and hydrologic impacts, changing habitats, and more at the table with unique sets of engaged stakeholders, from utilities to agricultural interests, manufacturing and conservation, DNR has demonstrated the ability to work outside siloed programs to the benefit of all South Carolinians.
- Removal of the water planning role from DNR, at this stage in the state's investment in that work, would have the unintended consequence of increasing inefficiency in state government and losing momentum in an effort many organizations and partners across the state have already invested important time and resources into thus far.** Water is one of South Carolina's most precious natural assets. DNR is already successfully leading the development of the State Water Plan, thanks to the General Assembly's wise investment over the past several years in a robust stakeholder process for that effort. DNR staff have the expertise to carry out this important work as an integral part of advancing the agency mission as the principal advocate for and steward of South Carolina's natural resources.

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- **Placing the water planning and management role and water-related regulatory role within one agency would undermine public trust.** Currently, as a non-regulatory body, DNR stewards water planning and science initiatives as a neutral entity. This maintains trust in the agency among all water users and removes any perception that the agency is motivated to support specific regulatory or enforcement-related outcomes.

We encourage the committee to consider the initial goals associated with a bill aimed at creating greater public health outcomes for South Carolina by addressing improved efficiencies at the South Carolina Department of Health and Environmental Control. Those goals remain viable without risking negative impacts to water resource science and management. We welcome the opportunity to discuss this proposal further. Please do not hesitate to reach out if we can be of assistance to you or your staff.

Sincerely,



Dr. Jim Rothnie
Chair of the Board of Trustees
The Nature Conservancy
South Carolina Chapter



Dale Threath-Taylor
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