

No. 142, Original

**In The
Supreme Court of the United States**

STATE OF FLORIDA,

Plaintiff

v.

STATE OF GEORGIA

Defendant

Before the Special Master

Hon. Ralph I. Lancaster

**MOTION BY THE GEORGIA AGRIBUSINESS COUNCIL, INC.,
GEORGIA GREEN INDUSTRY ASSOCIATION, INC., AND
THE GEORGIA URBAN AGRICULTURE COUNCIL, INC. FOR
PERMISSION TO FILE *AMICUS CURIAE* BRIEF**

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MOVANTS' INTEREST AND PROPOSED BRIEF

The Georgia Agribusiness Council, Georgia Green Industry Association, and Georgia Urban Agriculture Council move for permission to file an *amicus* brief supporting the State of Georgia.

Georgia Agribusiness Council. Incorporated in 1966, the Georgia Agribusiness Council advances agricultural business in the State through economic development, environmental stewardship, and education. Representing more than 1,000 member businesses, the Council provides a forum for the industry to share views, develop understanding, and work on issues of common concern. The Council's membership ranges from family farming operations to retail farm suppliers, from grain elevators to wholesale produce distributors.

Water use and efficiency is a high priority for the agribusiness industry. Georgia's food and fiber production contributes \$74.3 billion to the economy and accounts for more than 411,500 jobs. In almost two-thirds of Georgia's counties, agribusiness and related industries are the largest or second-largest economic engine. The Council's members have a vested interest in the State's water resources.

Georgia Green Industry Association. The Georgia Green Industry Association is a trade association for the horticulture and landscape industries in Georgia. The Association's membership draws from six diverse sectors: wholesale growers, retail garden centers, landscape contractors, irrigation contractors, floriculture, and allied suppliers. Together, those sectors perennially rank among Georgia's top five agricultural commodities, making an \$8 billion impact on the State's economy. The Association strives to increase professionalism, to advocate for the industry, and to communicate the

environmental and economic impact that its members' products have on Georgia and beyond.

The Association's members depend on access to sufficient water resources. Producing living, breathing products requires water. Growers recognize the need to conserve and protect water resources and strive to minimize their usage and to maintain high water quality. The industry has long been a leader in protecting water resources for homeowners and citizens by promoting certified professionals and water efficient products while educating consumers and professionals alike on efficient and conservation-minded water use in the landscape.

The Georgia Urban Agriculture Council. The Georgia Urban Agriculture Council is a trade association for businesses, employees, and practitioners involved in all sectors of the urban agricultural industry. Urban agriculture involves creating, growing, introducing, and managing constructed landscapes designed to support and enhance natural environmental systems and a sustainable quality of life.

The Council represents one of the largest and most successful industries in Georgia, consisting of over 7,000 companies and more than 80,000 employees. The Council's members include all sectors of the industry, including landscape design, management and construction, irrigation design, installation, repair and management, turf care and sports-turf management, parks and recreation and golf-course management, nursery/grower/garden centers, sod production, tree care, and all green-industry suppliers and consultants.

The Urban Agriculture Council advocates for the environmental and economic benefits of urban agriculture. The Council educates its members about best management practices for environmental and economic

sustainability by working closely with the University of Georgia Center for Urban Agriculture. The Council promotes professionalism among their members and industry by encouraging continuing education, adherence to industry standards, and best management practices.

* * *

Most people associate agriculture in Georgia with peaches, peanuts, and pecans. But Georgia agriculture is all of those and much, much more. It also includes a wide selection of other crops, poultry, livestock, and things that you wouldn't immediately think of as "agriculture"—such as landscape management, horticulture, sod farms, and other similar undertakings.

Movants propose a brief that would provide information about those aspects of Georgia's agricultural industry. In their brief, Movants would focus on evidence central to the equitable-apportionment analysis. In particular Movants would (1) demonstrate the economic impacts on the diverse agriculture industry, including the often-forgot-about side of the agricultural economy (landscape management, sod farms, etc.), if water use in Georgia were capped; (2) provide some on-the-ground examples of the stakes for Georgia's agricultural families and rural communities, and (3) provide evidence that Georgia agricultural businesses of all types have used the water resources in question for generations to benefit not only the State but also the Country and increasingly the world.

CONCLUSION

For all these reasons, Movants seek leave to file an *amicus* brief covering the subject matter described above.

Respectfully submitted, this 16th day of September, 2016.

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CERTIFICATE OF SERVICE

This is to certify that Movants served this Motion on September 16, 2016,
in the manner specified below:

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