



Making Alabama Better For People

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COPY

September 26, 2012

Mr. Lance LeFleur, Director
 Alabama Department of Environmental Management
 Post Office Box 301463
 Montgomery, Alabama 36130-1463

Dear Mr. LeFleur:

The 2008 Farm Bill encouraged State Foresters to complete statewide assessments of their State's forest resources. The Alabama Forestry Commission saw this as an opportunity to fulfill its own legislative mandate "to make exploration, surveys, studies and reports concerning the timber and forest resources of Alabama. Chairman Bearden has been provided with a printed copy of this report titled "Forest at the Crossroads." This report was developed over an 18-month period with collaboration of 33 organizations, 37 subject matter experts, and with public comment from 865 citizens. This document was approved on June 18, 2010, by the U. S. Forest Service on behalf of the Secretary of Agriculture. The foundation of the document rests on a comprehensive assessment of the conditions and trends within Alabama's forest resource. From these, nine threats were identified. As we all know, forested acres equate to cleaner water, lower cost to produce potable water and filtration/percolation and recharge of ground water.

The nine specific threats to our forest can be directly tied to the twelve issue areas identified by the Alabama Water Agencies Working Group.

	Nine Threats to Alabama's Forest Resources	Twelve AWAWG Issue Areas
1.	Urban Growth and Development	Water Resource Management
2.	Fragmentation and Parcelization	Enhanced Certificates of Use/Permitting
3.	Invasive Species	Economic Development
4.	Changing Markets	Surface Water / Groundwater Availability
5.	Insects and Diseases	Drought Planning
6.	Wildfire	Water Conservation and Reuse
7.	Catastrophic Natural Events	Interbasin Transfers
8.	Air Quality	Instream Flows
9.	Climate Change	Interstate Coordination Issues
10.		Water Resource Data
11.		Key Stakeholder Education and Outreach
12.		Public Education and Outreach

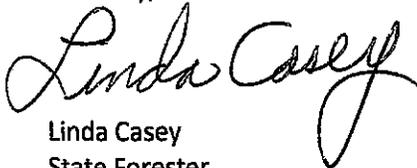
I will address my concerns as State Forester for the issue areas identified by AWAWG:

1. Water Resource Management – Before any issue can be fully addressed, I believe a comprehensive, science-based, complete water assessment for Alabama is needed. Until we fully know what we have (quantity, quality, and availability of the resource), piecemealing a water policy will not be publicly accepted and supported. I would oppose any water policy or regulation that would hinder the ownership or use of privately held forestland. Alabama has 22.8 million acres of forestland which accounts for 70% of the State's total land area. Eighty percent of those forested acres are owned by non-industrial landowners. In 2011, an estimated 440,000 family forest owners in Alabama controlled 67% of the State's forestland; this number has increased in time due to the massive sell-off of forest industry land.
2. Enhanced Certificates of Use/Permitting – My concern here would be to differentiate clearly between water use and water consumption. There are 17 pulp and paper mills remaining in Alabama. I would oppose any water policy or regulation that would hinder the production of these mills or the enhancement of these operations. These mills are part of a vast forest products industry that is the life blood of Alabama's economy as forest products manufacturing operations compile to make the second largest manufacturing industry in the State. These mills use a lot of water but consume very little, such as the generating plants that supply power to the mills that need it.
3. Economic Development – As addressed earlier, there are 670 forest products manufacturing operations in Alabama. There are 100 sawmills, 17 pulp and paper mills, 26 veneer and/or panel plants, and approximately 500 secondary wood processing operations. As the second largest manufacturing industry in Alabama, producing \$12.78 billion in 2010 with value-added of some \$6.45 billion, this equates to 12.3% of the value of ALL manufacturing in Alabama and is 9% of the State's GDP. They provide 46,800 direct jobs with a payroll of \$1.69 billion as well as 102,000 indirect jobs. Alabama forestland owners depend on these facilities to buy their crops and many depend on these facilities for a paycheck. I would strongly oppose any water policy or regulation that would hinder this industry. On the other hand, I would favor planning on the regional level that would help expand or create new markets.
4. Surface Water and Groundwater Availability – Forest = Clean Water. I can see only a positive for forestry in both applications—promotion of good forest management and healthy forest should benefit the availability/recharge for both sources. Again, a comprehensive assessment is needed as well as maintenance and expansion of the current gauging stations. Accurate, detailed and present time data is a must.
5. Drought Planning – My greatest concern is for drought data to be uniformly collected and that any Drought Management Plan includes all pertinent agencies and is consistent. We need enough monitoring stations that are well distributed for a good statewide map. The current KDBI for Alabama uses only 12 stations that are not well distributed.
6. Water Conservation and Water Reuse – Forestry would have no input on this other than any hindrance this may put on new or existing forest-related industry.

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7. Interbasin Transfers – If allowed, unchecked, and it promotes unsustainable growth in a specific area resulting in more fragmentation of existing forest cover for any watershed then water treatment cost will increase. A comprehensive assessment is needed and any policy/regulation needs to be uniform in nature, statewide.
8. Instream Flows – I agree that if a unified instream flow policy or legislation is adopted it should be at the State level to provide a mechanism for better agency coordination and management of water resources. A complete, coordinated assessment—taking into consideration all aspects of resulting policy—should be realistic and economically balanced. Timber markets are critical to the State's economy and any policy that is detrimental for the industries' production of or shipping of forest products should be opposed.
9. Interstate Coordination Issues – I would support and encourage the continuance of the stated policy options.
10. Water Resource Data – In my opinion this issue is the fundamental key to a successful plan. It should be priority one.
11. Key Stakeholder Education and Outreach – See #12 below.
12. Public Education and Outreach – The Alabama Forestry Commission is in a position to reach many stakeholders, public and private. The AFC would be willing to help facilitate the last two issues as long as it is clearly understood that any plan is positive toward private ownership of forestland and positive toward the industries that support these private owners recognizing that forestland is vital for clean water and the State's economy.

Sincerely,



Linda Casey
State Forester

cc: Glen Zorn, Assistant Commissioner, Alabama Department of Agriculture & Industries
Bennett Bearden, Chairman, Alabama Water Agencies Working Group