

October 25, 2012



State of Alabama
Department of Agriculture and Industries
1445 Federal Drive
Montgomery, Alabama 36107

ATTN: ALABAMA WATER AGENCIES WORKING GROUP

Re: Water Management Issues in Alabama

Gentlemen:

On behalf of Alabama's Water Environment Association (AWEA), we appreciate the opportunity to provide stakeholder feedback concerning the *Water Management Issues in Alabama* report, drafted August 1, 2012. AWEA is a non-profit water association with members representing the state's water/wastewater utilities, industries, consultants, equipment vendors, storm water utilities, academic institutions, and others interested in protecting and preserving water quality in Alabama. AWEA, like its parent organization the Water Environment Federation (WEF), proudly works to achieve our mission to provide bold leadership, champion innovation, connect water professionals, and leverage knowledge to support clean and safe water. AWEA is committed to actively engaging water professionals in Alabama in developing practices and procedures that support WEF's mission and vision while actively engaging water regulatory agencies in advocating balanced and fair water policies.

AWEA distributed the draft *Water Management Issues in Alabama* report to its Board of Directors and Government Affairs Committee to review and provide feedback to the Alabama Water Agencies Working Group (AWAWG) concerning this draft. We are pleased that Governor Bentley has charged the leading state agencies working with water-related issues in Alabama with evaluating water planning. Overall, we agree the document is well prepared and identifies the numerous advancements the state already has made concerning water management with the presentation of data currently on record and managed by the supporting agencies. Following is a summary of comments that AWEA submits for your consideration as AWAWG continues its work to respond to the Governor's direction:

- This document should provide a clear definition of the “problem” Alabama is trying to solve with this effort. The statement that the “plan will have implications” needs to document firm benefits of a statewide water management plan that resolve documented issues and concerns.
- It is not clear which agency, if any, is leading and will continue to lead this effort. One of our concerns is how this process can effectively be managed as a collaborative effort across a number of agencies with competing interest. We believe the Water Agencies, Legislature, and Governor will need to come to an agreement on how the planning process and plan implementation will be managed, both near term and in the future. It is our opinion that, at some point, one organization or agency needs to have the primary leadership responsibilities and resources to effectively manage this as a sustainable effort.
- Any State-wide plan needs to include comprehensive watershed-based planning as an ultimate outcome for success. This includes inner basin transfer, water withdrawal rights, beneficial use, water quality maintenance and improvement practices, habitat protection methodologies, and conservation strategies such as water reuse (reclaimed water, storm water, industrial process water), all as key to sustainable solutions to watershed management. WEF strongly supports this practice nationally which compliments work being considered by the U.S. Environmental Protection Agency.
- As Alabama moves forward with water resource management planning, the interrelationship between water quality and water quantity must be at the center of implementation strategies. A reference is made in the document to Alabama’s “finite” water supply. AWEA recognizes Alabama’s abundant supply of water resources, but the quality and quantity do not always satisfy the need in communities in a timely manner and without unaffordable and unrealistic costs. Alabama’s water management plan needs to include procedures and standards that promote the use of comprehensive watershed planning for future development. It is our view that any procedures and standards should allow flexibility for innovative solutions and collaborative efforts that facilitate the sharing of resources to meet long-term water quantity and quality demands for all Alabamians while protecting and preserving public health and the environment. Some southeastern states have allowed economic development to drive decisions to the point that the need exceeded the availability of water resources. Alabama needs to make wise choices in developing long-term use plans and not follow in their paths.

AWEA is looking forward to participating and keeping our members informed as the process for water resource management planning moves forward.

Sincerely,



Lennette Sheffield West
AWEA President