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Office of the State Geologist
Geological Survey of Alabama
P.O. Box 20276
Tuscaloosa, AL 35402---0276
Re: Alabama Water Watch Comments to the AWA WG

May 22, 2013

Dear Dr. Bearden,

Thank you for the opportunity to provide input to the Alabama Water Agencies Working Group's historic efforts in drafting the first-ever comprehensive water management policy for Alabama. Alabama Water Watch (AWW) has been supporting and promoting citizen volunteer water monitoring and watershed stewardship throughout Alabama for the past 22 years. AWW efforts include:

- certification of citizen monitors via workshops in Water Chemistry Monitoring, Bacteriological Monitoring and Stream Biomonitoring, as well as,
- supporting data-to-action strategies via maintenance of an online water quality database with an array of data visualization and analysis tools, data interpretation presentations to monitor groups throughout the State, and technical backstopping of water monitor groups throughout the state.

AWW strongly supports the development and implementation of a statewide comprehensive water management plan that provides Alabamians with safe, abundant potable water and accommodates economic development, while simultaneously preserving and protecting our streams, rivers, lakes, estuaries and bays through the promotion of environmental stewardship. The comments below are addressing the content of the AWA WG report to Governor Bentley titled 'WATER MANAGEMENT ISSUES IN ALABAMA.'

1. AWW agrees with the comment on page 1 that 'current state water policies need to be reformed' and that future uncertainty in our state's water resources and the threat of encroachment of federal management of our state's water resources can be addressed via 'state agencies working (more) cooperatively on water issues.'

One area that we envision great improvements in water policy is the adoption of consistent water quality criteria across agencies and clear delineation of agency responsibilities. A case in point that we, and many Alabamians, have had repeated difficulties with is the criteria used for determining the presence of sewage/fecal contamination from warm-blooded animals. The Alabama Department of Environmental Management (ADEM) recently adopted *E. coli* as its indicator of contamination of waters by feces from warm-blooded animals (adopted in 2010, prior to this, ADEM utilized fecal coliforms), whereas the Alabama Department of Public Health (ADPH) does not utilize or recognize the presence of *E. coli* as an indicator of sewage/fecal contamination. This has brought much frustration to certified citizen monitors who have repeatedly

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measured excessively high *E. coli* concentrations but can get no action to resolve fecal contamination issues in public and private waters.

We have also experienced confusion and frustration among water monitors and members of the public regarding which state agency is responsible for bacteria contamination. There is supposedly a threshold number for gallons per day discharge from septic systems that separates the responsibility of the ADPH and ADEM, but citizens often call both agencies and are told that the other agency is responsible for a given problem.

We propose the consideration of standardization of the indicator of sewage/fecal contamination used across state agencies (ADEM, ADPH, others), and a clearer understanding of agency responsibility with good public communication, to facilitate the efficient remediation of the many contamination problems across the state.

2. AWW feels that the AWAAG has done a good job of identifying the 12 water management/policy issue areas in Alabama, outlined on pages 4-6. We wholeheartedly endorse #4 – *Surface Water and Groundwater Availability*, which includes ‘enhance funding and expand the State’s capability for acquiring and evaluating surface water and groundwater resources data and information.’

We propose that the AWAAG consider incorporation of AWW’s extensive water database and ongoing water data collection as a cost-effective component in this facet of the state’s water policies and plan formation.

3. AWW also wholeheartedly endorses #6 – *Water Conservation and Reuse*, which includes ‘develop a public education program concerning the need for and benefits of water conservation and reuse.’

We propose that the AWAAG consider incorporation of AWW’s extensive experience, resources and statewide network of water monitor groups as a cost-effective component in this facet of the state’s water policies and plan formation.

4. AWW also wholeheartedly endorses #9 – *Water Resources Data*, which includes:

- ‘Provide enhanced funding to support state efforts to develop a robust and scientifically based surface-water and groundwater data foundation for conducting assessments and determining water allocations.’
- ‘Expand Alabama’s rainfall monitoring network working through the State Climatologist and through public climate data collaboratives.’

We propose that the AWAAG consider incorporation of AWW’s extensive water database and ongoing water data collection as a cost-effective component in this facet of the state’s water policies and plan formation.

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We also propose that the AWAAG consider supporting expansion of the scope of the AWW Program to include rainfall monitoring, which could be done efficiently by promoting and employing CoCoRaHS or Community Collaborative Rain, Hail and Snow Network methodologies (see www.cocorahs.org).

After 20 years of core funding from ADEM to support the development of AWW, all state funding for the program stopped in 2010. This funding cut was attributed to greatly reduced funding to ADEM by the AL State Legislature and the USEPA. ADEM currently has a budget that is the second-lowest per capita in the nation, and it is difficult to imagine how policy issue #9 could be achieved under such budget constraints. The citizen volunteer monitoring effort in Alabama has been made more vulnerable with these cuts, and now depends on Auburn University support and external grants. Some consistent financial support from the Legislature or a state agency would greatly help in ensuring AWW's future and the good will of scores of stream and lake community groups.

5. AWW whole-heartedly endorses #11-12 – *Key Stakeholder Education and Outreach and Public Education and Outreach*, which includes:

- 'Identify key stakeholder groups to facilitate a more efficient and effective dialog for statewide water management.'
- 'Afford the opportunity for all stakeholders to participate in the process of developing water policies and a statewide water management plan.'
- 'Publicize and promote Alabama's water resources as fundamental to sustaining a desirable quality of life, future economic development, aquatic habitat, and biological diversity.'

We propose that the AWAAG consider incorporation of AWW's extensive experience, resources and statewide network of water monitor groups as a cost-effective means to help identify key stakeholders, facilitate stakeholder involvement, and publicize and promote Alabama's water resources and the efforts of AWAAG, the Permanent Joint Legislative Committee on Water Policy and Management and the Governor in formation of the state's water policies and plan.

We believe that both formal and informal environmental education is a critical element of any watershed management strategy. Water management policy will be much more effective with strong community involvement, and much more efficient if the community is well informed about water issues. We propose that the AWAAG consider incorporation of an environmental education component, such as AWW's AMSTI-accredited Exploring Alabama's Living Streams, for educating youth, our future leaders.

6. AWW supports the efforts of the ADCNR and GSA within AWAAG to ensure adequate in-stream flows to protect aquatic biota.

We have conducted stream biomonitoring workshops for many years, using aquatic macroinvertebrates as indicators of water quality, and have come to

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realize that Alabamians are eager to learn about aquatic ecosystems, the relationships between flow regimes and life histories of fish and other organisms, and how to protect this biota. Any disruption of natural hydrology through stream channel diversions or impoundment should be closely monitored and carefully done to preserve near-natural flows.

We greatly appreciate this historic opportunity to provide input into the formation of a comprehensive water management plan for Alabama. Feel free to contact the AWW Program Office for further discussion of our comments, or if the need for additional input arises.

Sincerely,

William Deutsch, PhD
Director, Alabama Water Watch Program

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