



October 30, 2012

Alabama Water Agencies Working Group
Alabama Department of Economic and Community Affairs
P.O. Box 5690
Montgomery, AL 36103-5690

450C Government Street
Mobile, Alabama 36602
(P) 251-433-4229
(F) 251-432-8197
info@mobilebaykeeper.org
mobilebaykeeper.org

OFFICERS:

C. Ray Mayhall, Jr.
President

John C. Bell
Vice President

Maria Gwynn
Secretary

J. Benson O'Connor, III
Treasurer

Casi (kc) Callaway
Executive Director & Baykeeper

BOARD MEMBERS:

bj Cooper

Ellen H. Dyas

Chris Fuchs

Veronica Herndon

Sallye English Irvine

Thomas A. Lightcap

W. Bryan Pape, Jr.

Robert C. Prater, Jr.

B. Greer Radcliff

Max L. Reed

Frank H. Summersell

John Thompson

Steven A. Willard

HONORARY MEMBERS:

Jimmy Buffett

Robert Evans, MD

Jack V. Greer

Terry Hartley

Frederick T. Kuykendall, III

E. Rob Leatherbury

Gregory S. McGee, MD

James "Jimbo" Meador

Michael Meshad, MD

Edward N. Morris Jr.

Henry R. Seawell, III

L. Page Stalcup, III

Stewart Thames

Re: Water Management Issues in Alabama Report to Governor Bentley

Dear Sir or Madam:

We are Mobile Baykeeper, a 15-year-old nonprofit organization with the mission of providing citizens a means to protect the beauty, health and heritage of the Mobile Bay Watershed, Alabama's waterways and coastal communities. We are submitting comments on the Water Management Issues in Alabama report on behalf of our board, officers, staff, and more than 4,000 members. We commend the Governor and the Alabama Water Agencies Working Group for taking the first steps in addressing the critical issue of managing water resources in the State of Alabama. As our state grows in population and in economic scope, the proper stewardship of our water resources in the future will be critical to ensure public, economic and environmental health.

In our review of the Alabama Water Agencies Working Group report, we were encouraged to see that one of the report's recommended next steps is to encourage the funding and completion of work to complete surface water and groundwater assessments, determination of instream flows and all data necessary to provide a scientific basis to develop statewide water policy and a comprehensive water management plan. In our estimation, understanding the state of our current water resources is vital, as there is no way to plan for future water needs, let alone understand current demand, without establishing the baseline conditions of instream flows and groundwater recharge. Scientifically derived environmental flow standards should be the cornerstone of the water management plan, which cannot be created without thorough surface and groundwater assessments. The funding of data collection is critical to this process and we support this effort as a budget priority for the involved agencies. We are especially supportive of the idea of establishing a water resources data clearinghouse with data being web-accessible for the public as a show of

Providing citizens a means to protect the beauty, health and heritage of the Mobile Bay Watershed, Alabama's waterways and coastal communities.



governmental transparency as well as a useful tool for the scientific, academic, and environmental communities in research efforts.

We are encouraged to see noted in the report the high importance of both stakeholder and public education and outreach. The report's introduction states many Alabamians assume our water resources are more than adequate. It is easy to see why, given the wealth of waterways we see and utilize in all corners of the state. We as a state also seem to have a remarkably short memory when it comes to increasing and repeated periods of drought, as well. We are pleased to see that the Working group has recommended the need to educate the public on the benefit of water policy and secure the public's buy-in to this initiative through a targeted media campaign. We are also honored to see our organization, Mobile Baykeeper, listed as a stakeholder organization and look forward to the opportunity to provide our input, assistance, and support in the process of forming a statewide water policy. We do suggest that the Working Group and individual agencies ensure statewide participation by making sure stakeholder and public meetings, workshops, hearings, etc. are held at multiple geographic locations throughout the state, from the coast to the mountains, not just Montgomery and Central Alabama. We also recommend the formation of a system for stakeholder participation in the decision making process with a focus on cultivating decision making at the local watershed level.

Further, we are also pleased at and commend the efforts and determinations of the Water Agencies Working Group related to Drought Planning and Water Conservation and Water Reuse. As incidences of drought seem to be occurring more often, a statutory drought planning mechanism to conduct drought monitoring, management planning and response processes is absolutely necessary to reduce stress on water resources. Water conservation and reuse components listed within this report are also to be commended. We are very supportive of the policy options of promoting conservation and efficiency in public utilities, educating the public on the need for conservation, locally determined conservation measures during periods of drought and determining a methodology or methodologies to measure conservation and efficiency.

Conversely, there are areas of discussion within the report with which we have serious concerns, particularly in relation to interbasin transfers, reservoir creation and irrigation. While we understand the necessity of regulating existing interbasin transfers, we are very concerned about the policy options listed that allow for expansion of new interbasin transfers. Interbasin transfers are a mechanism for facilitating growth in areas that would be unsuitable due to lack of water resources, as evidenced by the city of Atlanta and northwest Georgia. Due to the significant detrimental impacts to water quantity and quality from interbasin transfers on affected watersheds, we cannot support any expansion of interbasin transfers in Alabama nor their inclusion as a method of water management in a statewide water policy.

We are also concerned about the stated policy option of integration of new reservoirs and off-stream storage for water supply. Generally, Mobile Baykeeper is opposed to built measures that impede or divert the natural flow of waters. A stated goal within this report is to maintain and



October 30, 2012, 3

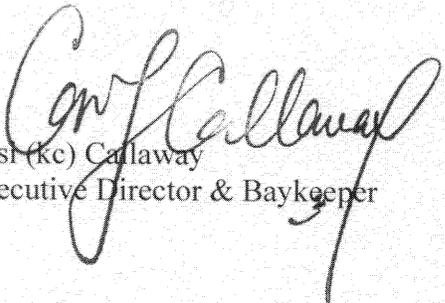
protect the integrity and health of natural stream channels, floodplains and riparian zones as well as groundwater aquifers essential to a sustainable water resource. We assert that a push towards diverting those natural flows through reservoir creation and off stream storage is antithetical to protection of our natural, existing water resources. Additionally, the language in the Economic Development Water Issue Area concerning developing economic incentives such as low-interest loans or tax credits to encourage investments in irrigation infrastructure for agriculture seems at odds with the report's stated goals at water conservation. While we appreciate the need for adequate water resources to facilitate Alabama's agricultural interests, we do not think widespread irrigation is the answer, as vigorous irrigation can put pressure on water resources not only from increased withdrawal but also on water quality due to increased runoff containing pesticides and excess nutrients entering our waterways.

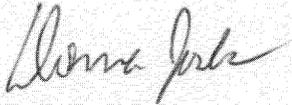
We recommend a holistic approach. Mobile Bay is at the bottom of this massive basin and issues of additional pollution coming from upper reaches of the watershed are a real problem. While the report contains significant language regarding inland agriculture, there is not so much mention of a water policy's impact on the seafood economy at the base of the watershed. A recent study conducted by Dr. Sam Addy of the University of Alabama related to the 2010 Deepwater Horizon Oil Disaster economic impacts, found the economic impact from tourism and fisheries to the state of Alabama from Coastal Alabama is roughly \$2 billion per year. Sufficient seasonal flows from upstream are vital to the seafood economy. We assert a statewide water policy must be adequately protective of the bottom of the watershed, Mobile Bay and Coastal Alabama.

In conclusion, we reiterate our support of the creation of a statewide comprehensive water policy. Our water resources are infinitely valuable to the health of our state both economically and environmentally, but they are finite. We affirm that sustainable protection of our water resources is key to Alabama's future to ensure there is water enough for everyone. Mobile Baykeeper looks forward to the continued development of the comprehensive water policy and are grateful for the opportunity to provide our input, assistance, and support in this important and historic process.

Thank you, in advance, for your consideration of these comments. If you have any questions or need additional information, please do not hesitate to contact us.

Sincerely,


Cassi (Kc) Callaway
Executive Director & Baykeeper


Donna Jordan
Program Director

