



United States Department of the Interior

FISH AND WILDLIFE SERVICE
1208-B Main Street
Daphne, Alabama 36526

IN REPLY REFER TO:

2013-TA-0066

NOV 08 2012



Mr. Stan Cook
Chief of Fisheries
Alabama Department of Conservation and Natural Resources
64 N. Union Street, Suite 468
Montgomery, AL 36130

Dear Mr. Cook:

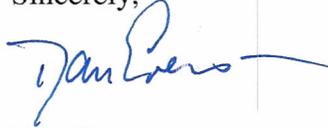
This letter is in response to Governor Bentley's August 30, 2012 letter requesting agency feedback on the Alabama Water Agencies Working Group (AWAWG) report, *Water Management Issues in Alabama*. We fully support the need to develop a state water management policy and applaud the Governor's Office for taking the proactive steps necessary to develop this policy. With the ever-growing demands placed on our water resources, we also agree that we must act now to ensure that this vital resource is properly assessed, allocated, and monitored for future use.

The Service completely agrees with the list of "water issues" outlined in the Appendix, and reiterates that the basic steps of managing the resource are understanding what you have, how much is needed, and what are the desired future conditions. Like managing any budget (financial or water), you must first have a good understanding of your baseline resources. This means a dedicated effort to assess both surface and groundwater availability (i.e., enhancing our surface and groundwater data collection network). Secondly, you must understand the demand placed on the resource. This primarily involves a water use analysis that incorporates not only human and industrial consumption, but also how much is needed to maintain a healthy ecosystem (i.e., development of multimetric indices and studies, and instream flow analyses). Lastly, you must develop a plan to adaptively monitor the previous steps to ensure that the desired conditions are being met into the future.

This is no doubt a very complex issue and one that has to be investigated and monitored across multiple geographies. We have and continue to work closely with ADCNR, GSA, and ADEM on a variety of water related issues, from drought management to instream flow needs for federally protected species, and most recently, on the Strategic Habitat Unit (SHU) project. The SHU process is a multi-geography-based process that identifies priority watersheds based on presence of imperiled aquatic organisms (fish, mollusks, and crayfishes). We believe by working strategically in these basins we not only preserve existing conditions for our species of interest but will also preserve the integrity of the water resources for multiple users. We also firmly believe that the most economical approach to protecting water quality and quantity, and meeting the needs of multiple users into the future, is first ensuring that biological integrity is maintained in our rivers and streams.

The Service appreciates the opportunity to comment on this first plan and we welcome the opportunity to assist and provide input in this process as the AWA WG moves forward. If you have any questions or need additional information, please contact Mr. Jeff Powell, at (251) 441-5858 or via email jeff_powell@fws.gov.

Sincerely,



Dan Everson
Deputy Field Supervisor
Alabama Ecological Services Field Office

cc: Pat O'Neil, Geological Survey of Alabama, Tuscaloosa, AL
Andrew Henderson, ADCNR, Tuscaloosa, AL