

From: Norris, James

Sent: Tuesday, August 28, 2012 2:48 PM

To: Spear, Reid

Subject: FW: Water Management Issues In Alabama - 19

I work with the Soil & Water Conservation Committee and we work primary with all types of Agriculture through local farmers/landowners in all 67 counties in Alabama. I have read the Draft plan for Alabama's water resources and total agree we need a plan for Alabama. You cannot find anyone any group any agency or anything that Alabama's water resources plan would not effect. I don't think agriculture is talked about enough in the draft plan. I know we can live longer without food than water, however food is also a must and without managing both a lot of the other uses of water want really matter. I hope a plan can be developed without to many laws and regulation being put in place remember for every law, rule or regulation put in place there will be a reaction whether it be positive or negative.

J.O. Norris

Water Quality Coordinator



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**SOIL AND WATER
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October 26, 2012

Mr. John McMillan
Commissioner of Agriculture
P.O. Box 3336
Montgomery, AL 36193

Dear Commissioner McMillan:

Thank you for the opportunity to submit comments on the Document Water Management Issues in Alabama. I feel that the document is well written and comprehensive in scope. I have met with our close Federal Partners, USDA Natural Resources Conservation Service, and our comments have been consolidated into this letter dealing with the Agricultural portion.

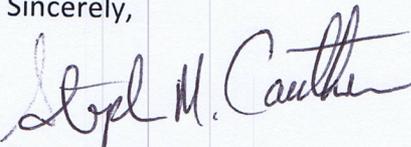
We feel that it is very important to have a Water Management Plan for the State. In general, we suggest use be made of the agencies and authorities we have in place in state government with funding necessary to manage the water we have available. Flexibility must be built into the plan with common-sense approaches stressed. Private lands comprise a major portion of the land area in Alabama. The document should include the notion that conservation activities on private lands improve water quality and quantity. Conservation activities on private lands conserve moisture, thereby reducing the amount of irrigation required. They promote infiltration which restores aquifers and make soil moisture available for plant growth. Conservation activities also decrease soil erosion to keep sediment out of stream and reservoirs needed for water use. A major portion of our water quality and quantity issues originate on this private land. So many of the solutions to water management rely on our ability to deliver conservation and make decisions at the local level. Private lands conservation is where our authority lies and our expertise and delivery of technical assistance and program assistance to land-users in a voluntary non-regulatory approach is our strong-suit.

Agricultural water management and conservation will become increasingly important in the future as populations increase and pressures mount to make available more and more water to urbanizing areas. Sometimes this is at the expense of our rural and agricultural communities. We have to be protective of our water supplies for agriculture if we want to be in a position to provide food and fiber to our ever expanding populations. Shifts in allocations away from agriculture would have dramatic effects on our ability to meet food and fiber needs for the long term.

Specific comments that we have are as follows:

- Agriculture should be exempt from any metering. We have enough expertise in place to know or closely estimate usage.
- The State of Alabama should commission a study to determine the best sub-basin areas or watersheds within the state that are best suited for irrigation; based on soils, topography, water availability or development, and available infrastructure.
- The Alabama Water Policy should take into account the Ecological Services provided by working farms and forest landowners. Tens of thousands of conservation practices are installed every year which increase water infiltration and improve off-site water quality. Water infiltration should be a recognized ecological service which serves to increase recharge for Alabama's aquifers. Water quality benefits for conservation treatments and well managed agricultural land and forest land should be recognized as providing healthy streams and rivers, increasing the ability of these segments to support aquatic ecosystems and withstand low flows.
- Page 17 – Last Paragraph describes point sources of pollution as including confined animal feeding operations (CAFOs). CAFOs are not considered point sources of discharge in Alabama as the animal manures are land applied as fertilizer.
- Page 22 – Second paragraph. Using drip irrigation on farms may or may not be a water conservation practice. The use of soil moisture monitoring to schedule irrigation is a water conservation practice.
- Page 29 – Consider including that the State should continue to support the Southeastern States Regional Water Resource Alliance Initiative.
- Page 31 – Consider including that the State complete a modern Inventory of Dams associated with the National Inventory of Dams.
- The State has no Safe Dam Legislation for the protection of the downstream public to ensure that High Hazard dams in the state are properly designed, constructed, and maintained.

Sincerely,



Stephen M. Cauthen
Executive Director