

COMMENTS

FROM

BALDWIN COUNTY WATER DISTRIBUTORS ASSOCIATION

CONCERNING

WATER MANAGEMENT ISSUES IN ALABAMA REPORT

Alabama Water Agencies Working Group:

The Baldwin County Water Distributors Association, BCWDA, consists of a variety of Stakeholders who are committed to a sustainable approach to water management as it concerns the water resources of Baldwin County. We appreciate this opportunity to comment on the final draft of the report compiled by the Governor's task force, or working group, for identifying a comprehensive approach to State-wide water management. The following items/comments are offered for consideration:

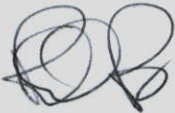
1. BCWDA agrees with 2009 report of the Permanent Joint Legislative Committee on Water Policy and Management where a structure for a regionalized approach to water planning and management was identified.
2. The "Enhanced Certificates of Use/Permitting" key policy options call for an enhanced system that is part of a comprehensive statewide plan. We agree that any plan should be part of a statewide plan, but recommend the enhanced system utilize capable local or regional entities to help establish and support the necessary research needed to identify water resources from both the current and future demands to the available water from all sources within that region. We support a formal system that monitors withdrawals from all sources within a region.
3. The "Surface Water and Groundwater Availability" key policy options call for enhanced funding to expand the State's capability for acquiring and evaluating surface water and groundwater resources. We believe this effort should also engage the help of and provide the support to local or regional entities in a partnership of research where local issues are better identified and considered in the research. Where several aquifers occur at different depths, we support a plan that identifies potential uses from specific aquifers in that location, as well as the effects of potential interconnections of multiple aquifers.

Richard Peterson, Chairman
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Jason Padgett, Secretary/Treasurer
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4. In this same policy option, we believe there is evidence that supports the investigation of groundwater recharge systems that divert storm water from direct surface discharge to surficial aquifer recharge where the groundwater available for stream base flow is enhanced. This can conceptually improve surface water quality while extending periods of base flow groundwater availability.
5. BCWDA supports the identification and protection of recharge zones.
6. BCWDA supports the concept of reuse water and recommends existing limits for direct discharge permitting, that meet basic secondary treatment levels, be continued as is until the reuse regulations are available so capital funding can be analyzed for either enhanced nutrient removal for direct discharge or reuse opportunities available through needed regulations. This may help facilitate reuse options to direct dischargers once reuse regulations are promulgated.
7. BCWDA supports criteria for interbasin transfers, and recommends groundwater systems and the aquifers that make up the groundwater network, be identified and defined within an appropriate basin for managing interbasin transfers.
8. BCWDA supports a structure that encourages regional input, cooperation, research and participation in the development and implementation of water policy within the State of Alabama.
9. BCWDA considers itself a "Key Stakeholder" and would appreciate being listed separately in the list of Non-Government Organizations (NGOs). We also believe Wolf Bay Watershed Watch and Little Lagoon Preservation Society should be included.

Thanks again for the opportunity to provide this input.

BCWDA



Richard Peterson, PE, Chairman



Clifford E. Johnson, Vice Chairman

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