



PO Box 985 • Columbus, Georgia 31902 • 706.649.2326

November 1, 2012

Alabama Water Agencies Working Group
Attn: Chairman Bennett Bearden

Chattahoochee RiverWarden, Inc. is a 501(c)3 non-profit organization whose mission is the use of science, education and advocacy for the protection and stewardship of the middle Chattahoochee River and its tributaries from West Point Dam to the Jim Woodruff Dam. Our organization represents more than 650 members, businesses and affiliations in Georgia and Alabama. We commend Governor Bentley for his directive to create the Alabama Water Agencies Working Group and for his request that the working group deliver a recommended statewide water management plan and timeline to his office by December 1, 2013. Our organization appreciates the opportunity to make comments and looks forward to continued involvement in the stakeholder process of developing a plan that is positive for all Alabamians and future generations.

Development of Good Solid and Timely Science

Currently about 10% of Alabama's waters have been evaluated to determine if they meet their designated use under the Clean Water Act. Nearly 40% of the streams that have been inspected are listed as impaired. The state should immediately begin a process of completing the remaining stream evaluation to determine the status of all waters of Alabama. We would suggest that the evaluation process be completed in the next ten years with the legislature providing the proper amount of necessary funding.

Alabama currently ranks fifth in the United States in plant and animal diversity and first in freshwater diversity. Sadly, the state also ranks fourth for the number of species at risk for extinction. As a building block for any state water management plan, good scientific data must be developed for ecological flow regimes to ensure that the future ecological health of our streams and rivers is maintained or enhanced.

Water is a Finite Resource

Alabama is currently blessed with tremendous and abundant water resources. However, water is not an unlimited natural resource. As the state continues to grow, demand for water will increase from the general population, industry and particularly agriculture. Alabama is in a unique position that it can lead by conservation and the efficient use of water. Conservation programs are the easiest to institute, will save money for citizen

A non-profit organization
that uses science, education and advocacy for the protection and stewardship of the middle Chattahoochee River and its tributaries.

www.chattahoocheeriverwarden.org



Made with 100% post-consumer recycled fiber

and local water suppliers, and delay the development of new water supply reservoirs and inter-basin transfers.

Stakeholder Involvement

The state water plan should recognize that the waters of Alabama should not be viewed as a whole. Planning for water should be given as much decision making per watershed that is reasonably possible.

Model Plans

As Alabama develops its water plan, we should look to our neighbors. Florida has developed a very effective model through the implementation of water management districts. A very small tax on every property owner in Florida has completely funded their program. Georgia has not done a good job with their plans as some of their water councils cover multiple piece basins. A good example is the Chattahoochee River which is divided into three planning councils. The Alabama water plan should strive to place as much accountability into a single agency as possible.

Comprehensive Database of Alabama Water Resources

As the various agencies go about gathering data to develop a comprehensive database of Alabama's water resources, various data gaps will appear. A comprehensive database of all gaps should be developed and a proposal submitted (including cost) to address those gaps. In addition, water demands should be projected for the next forty to fifty years by basin. Demand should be broken into various sectors such as thermoelectric, irrigation, industry, and municipal.

Permitting and Withdrawals

Alabama must adopt, implement and enforce a water permitting regime in which the state accounts for and authorizes all uses of state waters over a withdrawal of 10,000 gallons per day.

Land Use Planning

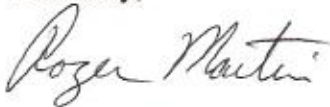
With increased growth in Alabama, the state must recognize that land use planning will be an ever-increasing responsibility. Increasing suburban sprawl and unregulated land development are some of the greatest perils to our water resources. Local governments and planning agencies should be educated on innovative processes that allow continued economic growth in a sustainable way while at the same time protecting our water resources for future generations. Some of these strategies could be the use of stream buffers to protect water quality, slow down stormwater runoff, provide critical habitat

and provide for nutrient uptake. The state must take a more active role in the future siting of landfills to ensure that surface water and groundwater are not at risk. All new construction and demolition landfills should be required to have a liner and leachate collection system.

The illegal dumping of trash in our waterways and streams continues to grow yearly. Alabama must take a more proactive approach to waste minimization, recycling, waste-to-energy conversion and mandatory garbage collection.

Chattahoochee River Warden appreciates the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script that reads "Roger Martin".

Roger Martin
Executive Director