

From: Nancy Jackson [mailto:njackson@otelco.net]
Sent: Thursday, November 01, 2012 3:01 PM
To: Zorn, Glen
Subject: Letter of Comment

Nancy Jackson, secretary
FRIENDS OF THE LOCUST FORK RIVER

Oct. 31, 2012

Re: Report on Water Management Issues in Alabama

by Alabama Water Agencies Working Group

Dear Glen Zorn,

Friends of the Locust Fork River commends the state and all concerned for attention to the important concerns of water management in our state. We are blessed with abundant water sources: all the more reason to steward them responsibly.

- Because we have many water sources, we have many stakeholders and it is our belief that a sustainable solution will rely on an open conversation at the table by all who choose to participate in setting of priorities and decision-making. Because of the gravity of the topic, we would advocate for stakeholder meetings and or public hearings., although those are admittedly painstaking. Hardly anything could be of more essential interest to Alabama residents.
- We believe a bottom-up process will yield the best, creative problem-solving thought-process. To the extent possible, that process should begin at the watershed level, from groups who know their water bodies first hand.
- We believe scientific standards should drive the decisions concerning environmental flow levels. We must attend to Alabama's extraordinary aquatic diversity.
- From square one, a plan for egalitarian enforcement should be kept in mind such that all stakeholders are equally held accountable for upholding the standards.
- Our premise at Friends of the Locust Fork River has always been the absolute top priority of CONSERVATION OF RESOURCES. Finding ways to conserve water is always the most sensible, most cost-effective and most sustainable route long term. Not only can we learn to use less water. We can use water more wisely by fixing leaks and promoting low flow toilets, and we can re-use water by using treated water for irrigation of grass at homes and on golf courses, as one example.
- Our experience with the Birmingham Water Works' proposed Locust Fork dam revealed extensive opportunities for conservation that were being overlooked in favor of a hugely expensive new project.
- New reservoirs or interbasin transfers are examples of such projects that do not serve well the longterm vitality of living communities. They should be avoided in favor of conservation measures.
- Nationwide we have seen projects in which conservation provided for population growth while reducing withdrawals. Just because human population and industry are expanding does NOT require more water be consumed.
- Any water consumed must then be managed. Far more sensible and cost-effective to consume less/more wisely in the first place and leave as much water as possible for Mother Nature to "manage".
- We are fortunate in Alabama to have a great deal of citizen monitor data through the longtime efforts of Alabama Water Watch. These data detail the parameters of healthy water bodies and the nature of problems in less healthy ones.
- For example, we cite the recent observations of a citizen monitor on the Blackburn Fork of the Locust Fork River:

“The Blackburn Fork wraps around the back of our property. Since we moved here in 2003, the Blackburn has dropped considerably. When we were first here, the stream was clear and flowing easily on both sides and fairly deep right behind our house -- I'll guess at 6 1/2-7 feet deep. No longer. It's looking more and more like a small shallow pond. On both sides of our deeper area (now 5-6 ft at most) it is so shallow that reeds and Cahaba lilies nearly fill it in.”

Eric Reutenbach of Alabama Water Watch made the following analysis of the data from that monitor test site: “The decline in flows and DO (dissolved oxygen data) is alarming...

“The longterm trend line for DO is declining. It is particularly notable that summertime low DO have dropped significantly, sometimes below or very near the ADEM-mandated minimum of 5 ppm (for Fish and Wildlife-classified streams).

“2004-2006: summertime low DO range was 6.7 – 7.4 ppm (good)

“2007-2012: summertime low DO range was 6.3 – 4.2 ppm (below 5 is not good – in violation of ADEM’s 5ppm standard for Fish and Wildlife).”

Since the Blackburn Fork drains Inland Lake, an impoundment owned and managed by Birmingham Water Works, a sound water management plan would attend to the withdrawal rate from that source. Here is an excellent case in point: such major water users need to be following statewide prescriptions for withdrawals, based on scientific data and a comprehensive overview.

In closing, on behalf of the Friends of the Locust Fork River, I believe Alabama officials work to serve the needs of Alabama residents. Water is one of our most vital needs. Water agencies must cooperate to find the best solutions for all concerned. Perhaps a power-sharing mode such as Forever Wild used could make use of “competing” interests to find what they can all agree on: for example, to advance Alabama’s wellbeing while incorporating “checks and balances” to prevent/minimize corruptions.

Sincerely,

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