

# TRVA

*Tennessee River Valley Association*

---

October 31, 2012

J. Brian Atkins, P.E., Division Director  
Alabama Office of Water Resources  
Alabama Department of Economic and Community Affairs  
401 Adams Avenue, Suite 434  
Montgomery, Alabama 36103-5690

Re: Report of the Alabama Water Agencies Working Group Regarding Water Management Issues in Alabama

Dear Mr. Atkins:

On August 1, 2012, the Alabama Water Agencies Working Group (Working Group) issued a report entitled "Water Management Issues in Alabama" (hereinafter "Report"). In response, the Tennessee River Valley Association (TRVA) is pleased to provide the following comments. We appreciate this opportunity to share our views.

## **About TRVA**

Since 1967, TRVA has served as the only non-partisan, unbiased, unified voice for overall common sense water resource policies in the Tennessee Valley. The TRVA Membership consists of towing companies, barge lines, port and terminal operators, municipal and industrial water users, and concerned citizens from across the region. TRVA promotes a balance of uses of the region's water resources that provides multiple benefits and opportunities to the economies of communities throughout the Tennessee Valley.

## **The Tennessee River provides enormous benefits to Alabama**

The Tennessee River is the most intensively used river system in the country, according to a joint study by the U.S. Geological Survey and the Tennessee Valley Authority (TVA). About 97 percent of the water taken from the river is returned to the system for use downstream, making the region one of the lowest water consumers in the United States.

Economies throughout the Tennessee Valley Region depend on the river system for low-cost power generation, municipal & industrial water supply, efficient waterborne transportation, recreation, tourism, environmental preservation, and jobs. Approximately thirty-six municipalities and nineteen industries in Alabama withdraw water from the Tennessee River System. Water is also withdrawn in Alabama for TVA power-plant cooling and for irrigation purposes.

In recent years, in excess of twelve million tons of commodities have been moved annually through approximately sixty Tennessee River ports and terminals in Alabama, supporting businesses and industries that provide thousands of beneficial jobs for valley residents. Recreational boating contributes over \$25 million to the Tennessee Valley economy each year, and overall water-based recreation generates in excess of \$2 Billion in annual revenues throughout the Tennessee Valley Region. The General Joe Wheeler and Lake Guntersville State Parks are located on the banks of the Tennessee River in north Alabama, contributing to the State's growing tourism industry.

The Wheeler National Wildlife Refuge, located along the Tennessee River between Huntsville and Decatur, was established in 1938 to provide habitat for wintering and migrating birds. Relying on the quantity and quality of water provided by the Tennessee, the 35,000 acre Refuge attracts thousands of wintering waterfowl each year and supports the southernmost and Alabama's only significant concentration of wintering Southern James Bay Canada geese. It also serves as winter habitat for the State's largest duck population. In addition to migratory birds, the Refuge hosts 115 species of fish, 74 species of reptiles and amphibians, 47 species of mammals, and 285 different species of songbirds. The Refuge is also home to 10 federally listed endangered or threatened species. Additionally, the Refuge is host to 650,000 visitors annually.

### **Interbasin Transfers**

TRVA appreciates the Working Group's discussion of interbasin transfers and interstate water resources. As identified in your report, "An interbasin transfer (IBT) involves the removal of water from that cycle and can be defined as the withdrawal, diversion, or pumping of water from one watershed to another. These transfers are normally the result of a manmade conveyance scheme and not some natural process."

In recent years, the Tennessee River has been repeatedly targeted as a source of water to sustain growth in regions outside the river's basin. Your report referenced the eight local legislative acts, enacted by counties bordering the Tennessee River in north Alabama, which will be superseded by a statewide IBT policy when established. TRVA encourages policies that will preserve those protections.

In addition to potentially adverse effects of the withdrawal of water from a donor basin, IBT's in many cases pose threats to basins receiving transferred water. Significant unintended, and potentially irreversible, economic and environmental impacts from invasive aquatic species can result from IBT's. Recent IBT's from the Red River basin into the Trinity River basin in Texas have resulted in the introduction of destructive Zebra Mussels into a basin where their presence had not been previously identified. Invasive aquatic weeds, including varieties of Milfoil and Hydrilla, can also be introduced through the IBT process into otherwise pristine watersheds.

The report also noted that neighboring states have enacted laws restricting IBT's. Similar legislation in Alabama has been discussed by the Legislature and would likely serve the state well as a component of an overall Water Policy. A process similar to those, proven to be successful, in other states requiring careful consideration of the consequences of IBT's could discourage all but the most necessary transfers of water between watersheds, thereby limiting the economic and environmental impacts to Alabama's river systems.

## **Conclusion**

Understanding there is a wide range of complexities within the IBT issue, both interstate and intrastate; TRVA strongly encourages a Water Policy that will restrict IBT's within the State of Alabama, preferably a policy component similar to that considered by the Alabama Legislature. A policy that will require careful, deliberative consideration of the environmental and economic impacts of IBT's on both the donor and receiving basins, will guarantee the continued benefits and opportunities that have for decades been provided by all of the Rivers of Alabama.

Sincerely,

Cline Jones  
Executive Director