June 18, 2010

John Burke, Chair
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Chairman Burke and Planning Group Members,

The Lone Star Chapter of the Sierra Club and National Wildlife Federation appreciate the opportunity to review and provide comments on the Initially Prepared 2010 Lower Colorado Regional Water Plan (Region K IPP). We consider the development of reasonable, comprehensive regional water plans to be a high priority for ensuring a healthy and prosperous future for Texas.

We wish to acknowledge several positive steps taken in the development of the 2010 Region K IPP. These include the incorporation of drought management and additional conservation as water management strategies as well as the work performed by the planning group and consultants to quantify the environmental impacts of water management strategies. These steps represent notable improvements over the 2006 Region K Plan.

Drought Management and Water Conservation

The Sierra Club and National Wildlife Federation have always been troubled that regional water plans are designed to meet all levels of use that people might choose to exercise for water during normal times even during a drought as bad as the historic "drought of record" in the 1950's.

This does not make sense, especially when much of this water will be used for outdoor watering to keep lawns and landscapes green. We simply cannot afford to provide the same amount of water for these purposes during a repeat of the drought of record.

Drought Management is an economically viable long-term water management strategy that reduces the need for development and maintenance of new sources by reducing non-essential water use during times of drought.

We commend Region K for including Drought Management as a strategy in this plan. This strategy should be expanded to apply to other WUGs in the future and to account for a larger portion of water supply strategies. We appreciate the inclusion of the table in Appendix 4D that shows the potential for water savings with Drought Management.

Water conservation is almost always the most cost effective and least environmentally destructive water management strategy available to meet water demands. Regional water plans must pursue efficient water use to the maximum extent reasonable. The Region K plan includes conservation as a water management strategy for all WUGs that have a shortage. The conservation strategies mirror the state recommendation to reduce water use by 1% per year until 140 gpcd is met. We commend Region K on the extent of the inclusion of water conservation strategies in its plan.

The City of Austin accounts for the largest portion of municipal water use in Region K. Austin is the regional leader in water conservation and have augmented their programs since the 2006 Region K plan. The Austin City Council approved a suite of water conservation recommendations in 2007. The goal of those recommendations is to reduce peak day water use by at least 25 million gallons per day.

In addition, the Austin City Council recently established the goal of decreasing per capita water use from 170 to 140 gpcd by 2020. The implementation of this program is currently in the planning stages. Austin Water Utility is expected to have a plan in place to achieve this goal by the end of 2010. The Region K Water Plan should reflect this additional conservation commitment.

The Lower Colorado River Authority undertook an extensive process to revise their water conservation plan in 2008-2009. The text in section 4.6.1.10 (page 4-37) states that LCRA is currently developing this plan. This plan was completed in 2009. The up to date information should reflected in the regional plan. The LCRA water conservation plan is available on the LCRA website at http://www.lcra.org/library/media/public/docs/savewater/2009_LCRA_Water_Conservation.pdf.

LCRA-SAWS Water Project

There are several strategies in the Region K IPP that are based on the LCRA-SAWS Water Project. It seems virtually certain that this project will not pan out. The inclusion of the defunct LSWP in the Region K Plan limits the value of the plan and may necessitate amendment of the plan once the final status of the project is formally determined. The planning group will need to assess whether the individual components of the LSWP are cost effective and realistic for implementation without SAWS footing the bill. The environmental impacts of each LSWP component will need to be thoroughly vetted.

Aquifer Storage and Recovery

There is very little information provided on this strategy in the Region K IPP (Section 4.6.1.11) other than the projected amount of water and approximate location of the diversion point and storage aquifer. We are troubled to see strategies that include few detail included in the recommended strategies for Region K. It is unclear how a useful environmental analysis can be performed for this strategy based on the information provided. The text states that the “assumed junior nature of this water right creates a strategy that has limited impacts to” environmental flows. This is a invalid assumption. A junior water right certainly has the potential to impact environmental flows.

Alternative Water Management Strategies

Several alternative water management strategies presented in section 4.16 of the Region K IPP are troubling. The strategies "off-channel storage in reservoirs' and "enhanced recharge of groundwater" in particular send up red flags. Both of these strategies rely on diverting "excess flow" from the Colorado River for storage in either an off-channel reservoir or in the Gulf Coast aquifer via a recharge basin or injection well. Both of these strategies are costly and have great potential to affect environmental flows negatively. We would prefer strategies that do not rely on removing even more of the supposed "excess water" in the Colorado River. Additionally, this strategy is unfeasible due to the prohibitively high cost for rice producers. This strategy is almost 7 times the cost of on-farm water conservation.

The LCRA's strategy to import 35,000 afy of groundwater from the Simsboro Aquifer was presented to the planning group at the end of the planning cycle. We think that it is imperative to have more information presented with these strategies and more time to deliberate them. The Sierra Club and National Wildlife Federation support sustainable use of groundwater resources. It is impossible to determine if this proposed strategy would fall under that category or not because of the limited information presented.

Environmental Impacts of Water Management Strategies

We appreciate the time and resources that Region K devoted to requests by the our organizations, planning group members and other stakeholders to provide a more quantitative evaluation of the environmental impacts of water management strategies in the 2010 plan. The RWPG and their consultants worked out a methodology that compares changes in the quantity of environmental flows (instream flow and bay and estuary freshwater inflows) based on whether a strategy ***is*** implemented or not. Unfortunately, not much was done with the results to help inform decision-making and many planning group members remarked that they were difficult to interpret. The analysis performed was a positive step and we look forward to improving the conclusions drawn from a more robust assessment in the next round of planning.

Thank you for your consideration of these comments. Please feel free to contact us if you have any questions.

Sincerely,

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