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TWDB

Temple McKinnon
Texas Water Development Board
P.O. Box 13231 Capital Station
Austin, TX 78711

The is a comment from the public to the current Water Plan for Region L to be part of the record of public comments and recommendations.

Dear Temple McKinnon:

The water plan as formulated for Region L, South Central Texas, mainly the Guadalupe and San Antonio River watersheds, as posted on the internet, has some serious flaws:

1. Appendix D concerning "The Influence of Juniper Control in the Upper Guadeloupe Watershed of Region L on Water Yield." Much of the information used to prepare this text has now been shown to be incorrect.

The latest research "Woody plant encroachment paradox: Rivers rebound as degraded grasslands convert to woodlands" by Bradford P. Wilcox and Yun Huang, GEOPHYSICAL RESEARCH LETTERS, VOL. 37, L07402, doi:10.1029/ 2009GL041929, 2010, disputes the idea that removal of juniper has led to increased river flows in these watersheds. What would increase the flows is better management of herbivory in these watersheds, together with the stopping of loss of habitat to urbanization. Most of the degradation of these watersheds has been the result of cattle ranching, particularly that practiced historically. To increase river flows, there needs to be an emphasis on restoration of the landscape within the watersheds of these rivers and a return to sustainable herbivory, with management of KR Bluestem invasive grass and a return to these watersheds of a dominance of native grasses. Restoration of the landscape will probably entail some removal of juniper, but in a selective manner and not the complete clearing of vast areas. Extensive clearing leads to habitat loss for native species and further degrades the already degraded landscape of the Texas Hill Country.

I recommend that Appendix D be revised and that any aspects of the water plan that rely on extensive clearing of juniper or other native trees and vegetation be revised in accordance with the latest information available. These recommendations should be replaced by an emphasis on the complete management of herbivory, not just grazing, that should become the normal management practice within these watersheds. Historic cultural practices related to cattle use have lead to unsistainable practices that should be replaced by the holistic management of herbivory that includes many factors in a given location, including, white tailed deer and exotics animal units per acre, the current native grass species and their abundance in that location, the effects of invasive species, climate conditions (includes temperatures and rainfall), and the use of fire as a management tool. This is a complex issue and considerable effort will be required to change unsustainable management practices that have been the normal for many years. If sustainable management is realized in these watersheds, stream flow will increase and flooding will be dampened.

2. Consideration of low flows as related to water entering the estuaries fed by these watersheds inadequately accounts for the needs of Whooping Cranes, a federally endangered species. The only perfunctory recognition of an obligation to the Whooping Cranes is completely inadequate and there needs to be a much more thorough commitment to the long term sustainability of this important species. The US Fish and Wildlife Service, The Nature Conservancy and private landowners have spent millions of dollars to date trying to protect this species, but this investment will be lost if insufficient water flows into the estuary occur at any time, leading to the deaths of Whooping Cranes due, mainly, to inadequate food supply.

Apparently the Water Board is willing to think about allowing Excelon to take water for a future power plant, but is unwilling to insure that the Whooping Cranes have sufficient flow to maintain a sustainable flock size. This is wrong, wrong, wrong, and must be addressed as a serious deficiency of the Plan.

Below are those areas of the Plan that I have found related to this subject, although I may have misses something in this excessively massive document.

4.10 Environmental Factors: Wintering population of endangered Whooping Cranes at Aransas National Wildlife Refuge located adjacent to Lower San Antonio Bay. Surface water diversions from a Ecologically Significant Stream Segment per TPWD.

4.11 Should the GBRA-Exelon WMS go forward and be included in the 2011 South Central Texas Regional Water Plan (SCTRWP), the full LGWSP for Upstream GBRA Needs (at 60,000 acft/yr) can not be included. However, it is possible to include this water management strategy(LGWSP for Upstream GBRA Needs at Reduced Capacity) as a recommended water management strategy in the 2011 SCTRWP along with the GBRA-Exelon WMS, should the planning group choose to do so.

Sincerely yours,

