



Life's better outside.*

June 15, 2010

Mr. Ronald G. Hernandez
San Antonio River Authority
P.O. Box 839980
San Antonio, TX 78283-9980

Re: 2010 South Central Texas Region L Initially Prepared Plan

Dear Mr. Hernandez:

Thank you for the opportunity to review and comment on the 2010 Initially Prepared Regional Water Plan (IPP) for South Central Texas Region L. Texas Parks and Wildlife (TPW) acknowledges the time, money and effort required to produce the regional water plan as mandated by Senate Bill 1 of the 75th Legislature. A number of positive steps have been taken since the first planning cycle to advance the issue of environmental protection. For example, the regional water planning groups are required by TAC §357.7(a)(8)(A), to perform a “quantitative reporting of environmental factors including effects on environmental water needs, wildlife habitat, cultural resources, and effect of upstream development on bays, estuaries, and arms of the Gulf of Mexico” when evaluating water management strategies (WMS). Quantification of environmental impacts is a critical step in planning for our state’s future water needs while also protecting environmental resources.

TPW staff has reviewed the IPP with a focus on the following questions:

- Does the plan include a quantitative reporting of environmental factors including the effects on environmental water needs, and habitat?
- Does the plan include a description of natural resources and threats to natural resources due to water quantity or quality problems?
- Does the plan discuss how these threats will be addressed?
- Does the plan describe how it is consistent with long-term protection of natural resources?
- Does the plan include water conservation as a water management strategy? Reuse?
- Does the plan recommend any stream segments be nominated as ecologically unique?
- If the plan includes strategies identified in the 2006 regional water plan, does it address concerns raised by TPW at that time?

The South Central Texas Region L IPP includes a brief description of natural resources including fish and wildlife resources. A detailed table listing threatened and endangered species by county with notations concerning their habitat preferences and protected status is presented in Appendix H of the IPP.

Major springs are also described and potential threats to natural resources were evaluated.

The Region L IPP includes a detailed quantitative reporting of environmental factors. Volume II of the IPP discusses technical evaluations of strategies and presents water management strategy summary sheets that include acreages impacted by each strategy. Where applicable, changes in environmental flows are predicted using Water Availability Models.

Environmental assessments are presented for proposed water management strategies included in the 2010 IPP as well as for the 1984, 1990, 1997, 2002 and 2007 Water Plans. While necessarily broad in scope, this quantitative analysis comparing each water plan highlights some interesting trends. For example, the 2010 IPP is projected to have more impact (per unit of supply) than any plan listed when considering endangered, threatened and species of concern due to the number of projects and pipelines traversing sensitive areas. The 2010 IPP is also projected to have a greater environmental impact (per unit of supply) on vegetation and wildlife habitat than either the 2007 or 2002 plans and fewer impacts (per unit of supply) to wildlife habitat than the 1984, 1990, or 1997 plans, largely due to the absence of large main-stem reservoirs included in earlier plans. Finally, the 2010 IPP appears to project moderate water quality and aquatic habitat impacts, although this is difficult to evaluate because the numbers in Table 7.2-5 do not match the values shown in Figure 7.2-5. Please double-check the calculations and presentation of the results. Overall, the 2010 IPP appears to have the highest cumulative impacts (per unit of supply) compared to earlier plans except for the 1984 plan.

While specific conclusions cannot be made at this point, TPW staff tends to agree with the statement that the predicted impacts associated with the smaller (but more numerous) strategies in the 2010 IPP may be more easily avoided and/or mitigated than the large scale impacts associated with reservoirs in earlier water plans.

The Region L IPP recommends water conservation for all water user groups. Region L is to be commended for including advanced water conservation as a water management strategy. According to the IPP, per capita water use in Region L is projected to decline over the planning period from 148 gallons per person per day in 2000 to 132 gallons per person per day in 2060. The IPP also recommends the expansion of water recycling, or use of reclaimed wastewater, for non-potable purposes such as parkland irrigation and instream flow augmentation.

Region L is also to be commended for considering and recommending reasonable drought management strategies to reduce water demands during

droughts. While TPW understands the need for planning to provide needed water supplies, municipalities and other water user groups have successfully promoted sensible restrictions during droughts. It is important that the success of these programs be reflected in regional water planning.

TPW staff is encouraged that Region L has recommended five segments for nomination as ecologically unique. TPW staff believes that the “clarifying provisions” provided by Region L are consistent with existing statutes.

The 2010 Region L IPP is a well organized report. Recognition is deserved for proposed designation of five ecologically unique stream segments, advanced conservation, drought management as a water management strategy, seawater desalination, use of off-channel reservoirs, recommended use of recycled water for non-potable uses for several WUGs, aquifer recharge, aquifer storage and recovery, brush management, and an ecological analysis of the impact of the 2010 plan. No major on-channel reservoirs are proposed within the region at this time.

While TPW is pleased to see that many of our earlier comments have been addressed, and appreciated being included in discussions with the Environmental Committee, concerns remain regarding potential impacts associated with several strategies. Increased reliance on groundwater from the Carrizo-Wilcox aquifer, particularly in Wilson, Gonzales, and Caldwell counties, is projected to cause substantial local drawdowns which could impact seeps, small springs, instream flows, and the biota dependent on these habitats. Recommended placement of four Type II recharge structures in stream segments identified by TPW as ecologically significant could result in environmental impacts to those segments. With this IPP in place, Comal Springs is projected to stop flowing if a repeat of the drought of record occurs, imperiling endangered species. The proposed interbasin transfer from the lower Colorado River could also potentially negatively impact the Matagorda Bay ecosystem. New appropriations from the Guadalupe River and/or increased use of previously unused water rights from the Guadalupe River will impact instream flows and freshwater inflows to San Antonio Bay that will likely reduce long-term inflows and increase bay salinities. This will invoke a host of complex estuarine community changes. Both seawater and brackish groundwater desalination can be ecologically advantageous strategies, as long as issues such as impingement and entrainment at intake locations and brine disposal options are carefully considered. Continued consultation with TPW staff will help to ensure that fish and wildlife impacts can be avoided or minimized.

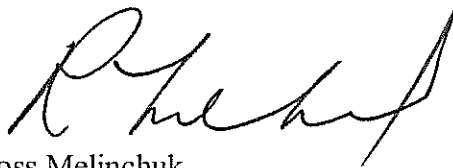
Section 7.1.3.3 illustrates model simulations comparing “natural,” “present,” “baseline” and “RWP” scenarios. In our opinion, the “present” simulation results in an overly conservative demand scenario since stacking the ten-year

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maximum diversion of each water right into a single year has not been observed. In part because of this assumption, the "present" conditions simulation results are fairly close to the "baseline" and "RWP" results, all of which show substantial deviations from the "natural" condition. TPW suggests that a comparison also be made with the average or median of the last 10 years for each water right and associated return flows. This scenario is significantly different from the "baseline" and "present" scenarios and will allow a useful representation of current, on-the-ground, conditions. Please let us know if we can help in this endeavor.

Thank you for your consideration of these comments. TPW looks forward to continuing to work with the planning group to develop water supply strategies that not only meet the future water supply needs of the region but also preserve the ecological health of the region's aquatic resources. Please contact Cindy Loeffler at (512) 389-8715 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross Melinchuk". The signature is fluid and cursive, with a large initial "R" and a long, sweeping tail.

Ross Melinchuk,
Deputy Executive Director, Natural Resources

RM:CL:ch