

**General Comments Regarding the Draft South Central Texas Regional Water Plan**  
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Each of us has a vested interest in the environmental and economic sustainability of the water resources in Region L. I represent Small Businesses on the Region L Water Planning Committee. I believe that means that I represent the interests in the sustainability of water resources for every business person and their respective families; from a shopkeeper in Rock Springs, to a restaurateur in San Antonio, to a crabber or fishing guide on the coast. The Region L 2011 Initially Prepared Plan (IPP) for the 2010 through 2060 period was developed in a collaborative process by representatives of the stakeholder community, supported by technical staff and HDR Engineering, Inc. The draft of the IPP was assembled and posted on February 12, 2010 to the Region L website at [http://www.regionltexas.org/2011\\_rwp2.php](http://www.regionltexas.org/2011_rwp2.php). The SCTRWPG (Region L) board had 7 days to comment on it. The following include some of the comments I made at that time and some additional comments that may be delivered later during the public hearing process. The IPP was submitted to the TWDB in late February 2010 and the public hearings and public comment period will occur in mid to late April.

*General Comments*

This IPP is thorough and comprehensive. It offers 10 sections which progressively discuss in greater detail the factors influencing the region, its water supplies and uses. This exceptionally professional endeavor offers significant details behind the many briefings that have been delivered to the SCTRWPG to date. However, an additional review and key word search may help to illuminate some discrepancies between what is presented in the various sections. Some are mentioned in the Specific Comments Section which follows. A thorough quality check will be necessary to find and correct any numerical discrepancies and/or to explain some anomalies between the various sections.

The various sections that refer to steam electric water demand do not mention or reflect the disclaimer that the Region L Planning Group discussed. We should have a statement that reads something like: "Considerable uncertainty exists in what the regulatory requirements may be in the future for the control of atmospheric carbon emissions from fossil fuel fired steam-electric power plants. Carbon sequestration and geologic storage may prove to be a mandated or economically attractive option for controlling such emissions. This technology, if employed, would consume considerably more water than existing power plants and removes a significant amount of it from the hydrologic cycle. Since carbon control technologies and legal mandates are not yet established, and because such plants in our region currently hold excess water capacity, these potential and unquantifiable future effects are not considered relevant to this 2011 plan. We will reconsider this issue in 2016."

### Specific Technical Review Comments

Page	Section	Paragraph	Specific Comment
ES 12-18	ES-8	All	New supplies through both engineered projects and conservation will account for 766,700 additional ac. ft. in Region L by 2060. The commensurate costs will rise from the current wholesale price of \$104 per ac ft to over \$2429/acft, the later associated with lower river basin off-channel storage reservoirs and seawater desalination.
ES 11-12	ES6	1	The costs of water storage are not provided. These blanks should be filled in.
1-7	1.2.3.1	2	The mention of ashe juniper ( <i>Juniperus ashei</i> ) is not mentioned in this section although it should be. A similar paragraph in section 7.2.1 does mention it. Since ashe juniper is such a dominant species of the Edward Plateau, is integral to at least one endangered species, and is relevant to water supply of the region, it should be mentioned here in section 1 as well.
1-18	1.4.2	1	This section is inconsistent with Section 1.2.4. The listed percentage of cropland and the percent of land which is irrigated should be consistent between these sections.
1-43	1.7.2.4	1	Water rights are attributed to GBRA, Invista, DuPont, and the City of Victoria. Why are the rights assigned to Dow and the conceptual Exelon Nuclear Power facility not mentioned. Both are major water rights holders.
2-16	2.3	2	Paragraph 1 of this section indicated that industrial water use in the state is mostly (60%) by the petroleum and petrochemical industries. There are a significant number of petroleum and petrochemical users in the lower Guadalupe River Basin. However, paragraph 2 does not list petrochemical industry as a major water user. This should be added and discussed.
2-18	2.4		This section fails to mention that steam electricity generation from nuclear power consumes 60% more water than coal fired plants and that coal fired plants with carbon sequestration will consume about 40% more water than the currently operating plants.
2-31	Table 2-12		The definition of the term County-Other (Rural) is not identified in the text until Section 4B. If the term is used here it should be explained here.