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May 16, 2017

Jeff Walker  
Executive Administrator  
Texas Water Development Board  
P.O. Box 13231  
Austin, Texas 78711

**RE: Request for Approval of Proposed Substitution to the Region L 2016  
Regional Water Plan**

Dear Mr. Walker,

At its May 4, 2017, meeting, the South Central Texas Regional Water Planning Group (SCTRWPG) received a briefing from Kevin Patteson, General Manager at the Guadalupe-Blanco River Authority (GBRA), on a proposed substitution to the Region L 2016 Regional Water Plan. Additionally, the Planning Group authorized the San Antonio River Authority, as Administrator for the SCTRWPG, to submit a request seeking pre-adoption review and written approval from the Executive Administrator of the Texas Water Development Board (TWDB) that the proposed revision meets the definition of “substitution,” as defined by the Texas Administrative Code (*see* 31 TEX. ADMIN. CODE § 357.51), or—if failing to satisfy such definition—a determination of whether the proposed revision constitutes a “minor” or “major” amendment.

Section 357.51 (e) of the Texas Administrative Code permits regional water planning groups to “substitute one or more evaluated Alternative Water Management Strategies for a recommended strategy if the strategy originally recommended is no longer recommended and the substitution of the Alternative WMS is capable of meeting the same Water Need without over-allocating any source.” Additionally, section 357.51(e) requires written approval from the Executive Administrator of Texas Water Development Board prior to making the substitution.” This letter serves as a request for such approval.

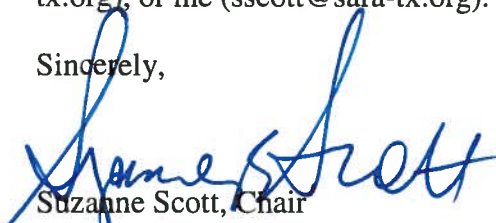
Specifically, GBRA requested the support of the SCTRWPG for its proposal to substitute an alternative water management strategy for two recommended water management strategies in the Region L 2016 Regional Water Plan to meet the water supply needs in Comal, Hays, and Guadalupe Counties. The 2016

Regional Water Plan includes the following two *recommended* water management strategies: 1) GBRA Mid-Basin Project (ASR) (50,000 acre-feet), and 2) Texas Water Alliance (TWA) Carrizo Project (MAG-limited) (15,000 acre-feet). The proposed *substitution* would replace both of these recommended water management strategies with the Mid-Basin Water Supply Project (MBWSP) – Conjunctive Use with Aquifer Storage & Recovery (ASR) (42,000 acre-feet). The MBWSP is currently listed as an alternative water management strategy in the Region L 2016 Regional Water Plan.

On behalf of the SCTRWPG, I hereby request written determination that the proposed substitution sufficiently meets the criteria outlined by section 357.51 (e) of the Texas Administrative Code. If the proposed substitution does not satisfy such requirements, please provide guidance as to which other type of amendment the revision constitutes (minor or major amendment). Subject to your determination, GBRA anticipates submitting the proposed substitution to the Texas Water Development Board following the next regularly scheduled Region L meeting (scheduled for August 3, 2017).

Should your office require any additional information from the Planning Group related to this request, please contact Cole Ruiz ([cruiz@sara-tx.org](mailto:cruiz@sara-tx.org)), Steve Raabe ([sraabe@sara-tx.org](mailto:sraabe@sara-tx.org)), or me ([sscott@sara-tx.org](mailto:sscott@sara-tx.org)).

Sincerely,



Suzanne Scott, Chair  
San Antonio River Authority, General Manager

Cc:

Kevin Patteson, Guadalupe-Blanco River Authority, General Manager

Jonathan Stinson, Guadalupe-Blanco River Authority, Deputy General Manager

Ron Ellis, Texas Water Development Board, Regional Water Planning Project Manager

Brian Perkins, Black and Veatch, Integrated Water Supply Practice Lead

Steve Raabe, San Antonio River Authority, Director of Technical Services

Cole Ruiz, San Antonio River Authority, Intergovernmental Relations Coordinator