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June 29, 2015

Via E-filing

Ms. Bridget C. Bohac, Chief Clerk
Office of the Chief Clerk (MC 105)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: TCEQ Docket No. 2015-0817-WR; Item No. 6, July 1, 2015 Commission Agenda – *Consideration of whether to affirm, modify, or set aside an Emergency Order issued by the Executive Director (ED) on June 17, 2015, pursuant to Tex. Water Code § 11.139, to the Lower Colorado River Authority (LCRA) to amend its 2010 Water Management Plan (WMP), Permit No. 5838.*

Dear Ms. Bohac:

The Central Texas Water Coalition (CTWC) appreciates the opportunity to submit these comments in support of the Lower Colorado River Authority's (LCRA's) request for emergency relief from the 2010 Water Management Plan (WMP) through October 15, 2015.

CTWC is a nonprofit organization that advocates for the preservation and conservation of the Highland Lakes' water supply for the benefit of human health and safety. Our organization includes municipal water suppliers and domestic water users who hold firm water contracts from LCRA for use of water from the Highland Lakes, as well as other entities and individuals that rely upon the presence of water in Lakes Buchanan and Travis for their health and welfare.

The current emergency situation is caused by a combination of two conditions: (1) continuing drought; and (2) an outdated WMP that we now know to be inadequately protective of firm water supplies. Although some parts of central Texas have received rains in the last two months, these rains do not mark an end to the drought. And while the outdated WMP is well on its way toward revision, it is not yet complete. Until a revised WMP is in effect, emergency conditions continue.

The LCRA has presented convincing support for its request. As LCRA documents, there is insufficient evidence to conclude the drought is over. While we are grateful for two months of wet weather, rainfall is only part of the drought relief equation. Those rains must translate into inflows into the lakes. Even with the past two months' rain, Lake Buchanan is barely above half-full. And this bump in storage could be only a temporary one, as we have seen so many times before (most notably, during the drought of record in the 1950s). Releasing water under the 2010

WMP would undo the tenuous gains we have made, just when temperatures and firm water needs are highest.

The necessity for emergency orders during the current drought demonstrates that the 2010 WMP is not adequately protective of firm water supplies. CTWC urges the Commission to affirm the ED's order so that we are not forced back under the 2010 WMP. CTWC appreciates the wisdom and leadership that the LCRA, the ED, and the Commission have shown in reminding all of us how important it is to be conservative with our water at all times. We respectfully request that the Commission affirm the ED's Order of June 17, 2015 to continue to protect central Texas' drinking water supply through the remainder of the year.

Sincerely,

Shana L. Horton

Shana L. Horton

cc: Robin Smith, TCEQ Office of Legal Services
Lyn Clancy, LCRA
Jo Karr Tedder, President, CTWC