



January 17, 2014

*VIA EMAIL AND FIRST CLASS MAIL*

Mr. Richard A. Hyde, P.E.  
Executive Director (MC-109)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: LCRA's Requested Emergency Relief from Existing Water Management Plan Provisions  
Governing Releases from Highland Lakes

Dear Mr. Hyde:

On behalf of the Central Texas Water Coalition (CTWC), a non-profit organization with approximately 3,000 members, I would like to express our support for the TCEQ's issuance of an emergency order authorizing the Lower Colorado River Authority (LCRA) to deviate from certain requirements in its 2010 Water Management Plan. Specifically, we urge the issuance of a TCEQ authorization that would allow the LCRA to provide interruptible stored water for first crop in 2014 only if the combined storage of Lakes Buchanan and Travis on March 1, 2014 is set at a threshold level of 1.4 million acre-feet or greater. As time has proven, it is essential for the new threshold trigger level to be set at a level that far exceeds the 850,000 acre-feet that was utilized in the TCEQ emergency orders in effect in 2012 and 2013. Under the previous emergency orders, stored water in the lakes has fallen to dangerously low levels and has not recovered to levels that provide any assurance that firm water commitments can be met in the next few years. According to today's data, the water supplies in Lakes Buchanan and Travis remain at only 38% of capacity, with no relief in sight.

Since the submittal of LCRA's request in early December 2013, the calendar year has ended and the gauged inflows from December 2013 have become available. Using that preliminary data, which shows a total of approximately 216,000 acre-feet of inflows in 2013, the year **2013** will go on record as the **second lowest year for inflows**. The "Top Ten" list of lowest inflow years since LCRA's records began in 1942 includes the years 2006, 2008, 2009, 2011, 2012 and 2013. These sobering facts cannot be ignored or downplayed by referring to long-term averages or the hope for rain. Drinking water supplies have been threatened by the historically low lake levels and drastically reduced inflows to the Highland Lakes, and there are no available alternatives to replace this water supply for a million people. There is no question that these conditions present an imminent threat to public health and safety, and the LCRA and the TCEQ are clearly justified in responding to these emergency conditions with emergency actions.

We agree with the LCRA's conclusion that establishing a higher combined storage trigger level and limiting the total interruptible supply that may be made available if the combined storage volumes exceed a higher trigger level is necessary in light of the prolonged and uncertain duration of the epic drought that we are experiencing in the lower Colorado River basin. However, we believe the proposed 1.1 million acre-feet (MAF) level is too low. Our technical studies and modeling results have shown that a combined storage trigger level of 1.4 MAF or higher is entirely justified by the current hydrologic and climatologic conditions. As the LCRA's December 10, 2013 application for emergency relief explains and

substantiates in a thorough and technical manner, the drinking water for over one million people is at risk as the drought continues. Immediately effective revisions to LCRA's water management procedures are critically important to protection of human health and safety.

As the LCRA application also notes, firm water customers have already implemented proactive conservation measures, and lawn watering has been limited for some time. Certainly, we support water conservation practices throughout the entire basin. However, the magnitude of this drought requires additional responses. Establishing higher combined storage trigger levels will assist the LCRA in meeting its directives for protection of firm water customers.

As the TCEQ considers LCRA's requested emergency relief, we ask that the TCEQ carefully scrutinize any provisions in an emergency authorization that would be in conflict with the terms of LCRA's existing water rights. We are concerned that LCRA's proposed exceptions to the threshold trigger level, which would allow the release of stored water to certain interruptible customers at this time of unprecedented drought, are in conflict with the laws governing LCRA's management of water in the lower Colorado River basin.

In further support of a TCEQ decision to provide emergency relief to the LCRA, we are attaching a copy of the comments that the CTWC filed with the LCRA Board on November 18, 2013, in advance of the Board's November 19, 2013 consideration of the LCRA staff's proposed emergency drought response for 2014. Please review these comments as you consider the issuance of an emergency authorization in response to LCRA's pending request.

Thank you very much for your careful attention to the critical need for reliable drinking water supplies in Central Texas. We would be pleased to answer any questions that you and your colleagues may have, and we are always available for further discussion or assistance on these important matters.

Sincerely,  
Jo Karr Tedder, President  
Central Texas Water Coalition

Attachment: CTWC Comments to LCRA Board Dated November 18, 2013

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Central Texas Water Coalition is a 501(c)(4) non-profit, non-tax deductible organization.  
*Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has.* Margaret Mead