

## **LCRA's Proposed Water Management Plan OVERVIEW**

During the WMP process when we represented you at the negotiating table as part of the 16-member committee (Lakes, Firm customers, Environmentalists, and Interruptible customers/rice industry), we achieved some improvements which we felt were better than the existing 2010 Water Management Plan. However, the latest version of the LCRA Water Management Plan (WMP), which the TCEQ released for public comment on April 15, 2013, still raises serious concerns as we continue in this multi-year drought.

### **Concerns/Changes STILL Needed:**

- 1) Recent hydrology, including recent record drought years (2010, 2011, 2012) is not taken into account. Data only up to 2009 is considered. This is important because recent data indicates the average inflows have significantly decreased from what was measured in the past.
- 2) No clear and distinct provisions are made for lake recovery time. As evidenced by 2010, one good year of rainfall and recovery in the midst of a drought cycle can be wiped out by huge releases the following. This is what happened in 2011. Without a recovery period we could be perpetually in a state of water emergency.
- 3) Despite implementing emergency orders curtailing some interruptible customers two years in a row, the WMP is not protective enough of current firm customers. Even with the two Emergency Orders, we are facing a potential Drought Worse than Drought of Record (DWDOR) this summer, which evidences the serious failure of the WMP.
- 4) The WMP violates the firm customer protections provided for in the 1989 Adjudication Order. It does not sufficiently account for growth in firm water uses, and we're already in trouble with current demands. Senators Fraser and Watson have introduced legislation to help correct this, but it should be included in the WMP as well.
- 5) There is no true incentive for conservation by firm customers in Central Texas. Water saved through expensive conservation measures may then become available for use by downstream farmers paying a heavily discounted rate. Saved water does not benefit the saver and the saved water may be wasted by another user. Failure to use annual supply can result in decreases in future supply, creating an incentive to waste water to avoid reduction in the future.
- 6) The WMP must use a multi-year planning basis for managing multi-year drought cycles. Using a one-year planning basis rather than a multi-year planning basis is too risky. A more conservative assessment of future hydrology is needed.
- 7) Any customer that has a contract for "guaranteed" water (i.e.: Garwood Irrigation District) must be considered a firm water customer and pay the firm water rate.
- 8) Allowing the LCRA to wait until January 2020 to submit an application to revise this proposed WMP using updated hydrology and updated firm customer demands is far too long in view of the critical water management issues and horrible drought that we're facing today.

## Conclusions:

Although there are some improvements in this proposed WMP, these improvements are not sufficient to assure that LCRA will provide a guaranteed water supply to the firm water customers in this current drought. With firm use growing and inflows declining, we will face chronically low reservoir lake levels that further endanger drinking water supplies. Chronically low levels do not benefit any of the interested parties; environmental, agriculture, municipal, industrial, or lake interests.

## Possible Recommendations:

- 1) Immediately impose a **minimum** storage level/ANYTIME CUT-OFF of 850,000 AF rather than the current 600,000 AF.
- 2) Keep the current TCEQ Emergency Order in effect
- 3) Require LCRA to utilize the hydrologic data from 2009 to the present to immediately update the hydrology of the Colorado River Basin.
- 4) Require LCRA to immediately update actual and projected firm demands, using updated hydrology
- 5) Encourage LCRA to immediately begin working with stakeholders on a new WMP that:
  - Properly protects firm users in times of drought;
  - Utilizes the latest hydrologic data available, including the significantly lower inflows to the lakes, to re-evaluate water availability throughout the river basin; and
  - Provides true incentives for conservation by all parties, including proper water pricing and assessment of relative economic benefit created by use of the water.

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