



Statement of Central Texas Water Coalition

Wednesday, Nov. 14, 2018

Good morning Chair Timmerman, members of the Board, and members of the staff. I am Frank Cooley, Vice President of Legal Services for the Central Texas Water Coalition. I appreciate the opportunity to comment on the proposed changes to LCRA's Water Management Plan.

Before my substantive comments, I would like to compliment and congratulate the LCRA personnel who so ably handled the recent torrential flooding in Central Texas. It was a difficult task under trying conditions, and we appreciate the hard work of the LCRA staff in handling this crisis. Thank you.

During the short time frame that we have been observing and commenting on the Water Management Plan Review, it appears that some improvements have been incorporated into the proposed WMP. There are limits on the amount of stored water that can be released from Mansfield Dam for interruptible customers. If there is a flash drought, a second crop may be cut off. Under this WMP, no interruptible water is released from lake storage if the combined storage of Lakes Buchanan and Travis falls below 1.1 million acre-feet. This WMP uses more recent hydrology that includes our experience in the most recent drought. These are positive developments that we believe improve the protections the WMP offers for LCRA's firm customers.

There are other aspects of the proposed new WMP that merit additional attention and improvement. As stewards of the precious water resources in the Lower Colorado River Basin, we look to LCRA to encourage and support water conservation by all of its customers. While Firm water customers are subject to continuous scrutiny of their conservation efforts, it seems that Agricultural Interruptible customers are not held to the same standards. The contracts for these customers do not seem to encourage conservation but rely upon a metric for irrigation water use (a number that looks at the acre-feet per acre of water that is used to irrigate a crop) that is at least 30 years old.

We have asked the staff to address the concerns regarding the conservation efforts of LCRA's agricultural customers by including a provision in the WMP Application expressing LCRA's commitment to perform a detailed analysis of the total on-farm water use by its Agricultural Interruptible customers, and to develop an acre-feet per acre "duty" for the crops irrigated. This

information would provide a more appropriate metric for assessing and tracking water conservation and usage in this customer group.

The latest results from LCRA's water availability models, with changes made in response to requests from the Colorado Water Issues Committee, indicate that the likelihood that Interruptible customers will receive a full-supply of Interruptible water for first and second irrigation seasons has significantly improved. Currently, LCRA's irrigation customers pay less than 10% of the rate paid by Firm customers for raw water. Under the proposed new WMP, there will be fewer curtailments for Agricultural Interruptible customers than in the 2015 WMP. This level of water supply reliability should not be undervalued by LCRA. We respectfully request LCRA's commitment to reevaluate the rates charged for its Interruptible water in a manner that reflects its true value as a water supply, as well as the substantial, unreimbursed costs that LCRA incurs to provide it to these customers.

In the recent LCRA briefings on the proposed WMP, the attendees discussed the importance of addressing such issues as: 1) identifying and addressing the dramatic decline in total inflows to the Highland Lakes; and 2) providing water accounting methods that provide "credit" for Firm water that is conserved and remains in storage in the Highland Lakes in a manner that does not then automatically result in a determination that more stored water may be released downstream for Interruptible customers. These are critical components of a successful WMP, and CTWC strongly supports both of these efforts.

Let me be clear. The message Central Texas Water Coalition wants you to hear is that, "we are worried about the future water supply in the Lower Colorado River basin." Period. We have raised many issues, but they are all part of our overriding goal of assuring that we plan for and meet the water needs of central Texas.

As the population continues to boom, and as weather cycles appear to become more intense, we know that water will become even more important than the issues facing our congested roads and other infrastructure. Water will become THE issue holding back economic growth and prosperity.

We are asking for your thoughtful leadership on the management of our water resources.

Again, thank you for the opportunity to present these comments. I appreciate your attention and consideration, and CTWC looks forward to continuing its communications with LCRA as the next WMP Application is finalized.

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