



## **COMMENTS OF THE CENTRAL TEXAS WATER COALITION REGARDING LCRA'S PROPOSED UPDATES TO ITS 2015 WATER MANAGEMENT PLAN**

*SUBMITTED VIA EMAIL TO [LCRAWMP@lcra.org](mailto:LCRAWMP@lcra.org)*

Thursday, November 1, 2018

The Central Texas Water Coalition (CTWC) appreciates the continuing opportunity to submit comments, questions, and items for discussion regarding LCRA's ongoing efforts to develop an updated Water Management Plan (WMP) for the operation of Lakes Buchanan and Travis. These comments include responses to matters raised during or after the most recent LCRA-hosted informational meeting on October 25, 2018. Please understand that these comments are not exhaustive, since the short time frame for submittal has limited the scope and depth of our comments.

### Emphasis on Water Conservation

During the LCRA's WMP participant meeting on October 25<sup>th</sup>, there was some discussion regarding the value of water conservation and the impact of water conservation on water users in the entire river basin. CTWC has always advocated for conservation by all water users, and we agree that conservation is vital to the present and future availability of water in the basin. However, it appears that this WMP is being developed without scrutiny of the enormous volumes of water used by LCRA's Agricultural Interruptible customers.

We request that LCRA return to the basics of its Adjudication documents for a determination of the water use by its agricultural customers on an "acre-feet per acre" basis. This evaluation should include water used for irrigation of rice and other crops, applying the appropriate "duty" for each crop by acre irrigated. After gathering this information, LCRA should compare the results to the 5.25 acre-feet per acre duty for growing two crops of rice (measured at the diversion point on the Colorado River) that was utilized by the State when the irrigation water rights were originally issued in the late 1980s. This type of analysis would make the evaluation of the water conserved transparent to the LCRA and its stakeholders.

We are concerned that conservation by Firm Customers does not reflect in keeping water available for Firm Customers. If we are serious about incentivizing and sustaining conservation efforts by the Firms in the Upper Basin, they must see direct tangible benefits that are more protective.

### The Importance of Fair and Reasonable Rates

The latest iterations of LCRA's water modeling, made in response to requests from the Colorado Water Issues Committee, indicate that the likelihood that agricultural

irrigation customers will receive a full-supply of Interruptible water for first and second irrigation seasons has significantly improved. This level of water supply reliability should not be undervalued by LCRA. We respectfully request LCRA's commitment to reevaluate the rates charged for this water in a manner that reflects its true value and the associated costs for providing it to these customers. We would expect the rates to increase significantly beyond the current rates.

### Arbuckle Reservoir

CTWC has always supported the concept of an off-channel reservoir downstream, but it was with the understanding that the upper basin would also benefit by having less stored water released. *It is not clear exactly how the upper basin will benefit from this reservoir.*

### Climatology

Climatologists, and now the general public, are fully aware of the impact of PDO/AMO cycles on drought probability in the Southwest and in Texas. For the WMP to ignore probabilistic inputs, tied to NOAA's ability to assess probabilities, could cast a negative light on the WMP planning process.

Recognizing this is a new approach, CTWC would like LCRA to consider a pilot program assessing best Climatology drought probability figures at least every six months and putting flexibility factors on the trigger points that appear in the plan. After this testing period, assess the effectiveness of this approach.

### Questions

After attending and participating in recent WMP update meetings and discussions, we would appreciate further information in response to these questions:

1. Does the proposed, updated WMP allow more stored water to be released from Mansfield Dam for the purpose of providing it to Agricultural Interruptible customers than the existing WMP?
2. Will you please provide model outputs that provide estimates of lake elevations according to Combined Storage volumes in Lakes Buchanan and Travis?
3. Will you please explain LCRA's plans to monitor and enforce its management of "ordered but not diverted" Interruptible water that is released from storage in the Highland Lakes?
4. Will you please provide notices to all stakeholders when LCRA commences its Agricultural Irrigation Ratemaking activities in the next few months? Please allow meaningful public participation in this important function of water management.
5. As previously requested, would you provide an analysis of the current situation of the Firm Yield of the Highland Lakes versus the actual Firm Usage? We are concerned that the location of the actual diversion points of the Firm Customers should be incorporated in the Firm Yield calculation. How much of the 50,000 acre feet Board Reserve is available for the Firm Customers in the Upper Basin.

### Addition of Ordering Provisions in Next WMP

1. Many of LCRA's presentations have referred to the next WMP as having a five-year duration. This should be incorporated into the WMP Application itself.
2. To address the assertions and concerns regarding the conservation efforts of LCRA's agricultural customers, please include a provision expressing LCRA's commitment to perform a detailed analysis of the on-farm water use by its Agricultural Interruptible customers, and to develop an acre-feet per acre "duty" for the crops irrigated. If its customers are supplementing their irrigation water with groundwater, the total volume of water should be reflected in the "duty" that is calculated.

In closing, we continue to urge LCRA to choose the more conservative option when performing water availability modeling and evaluating the alternatives for management of the water supplies that are so critically important to this region.

Respectfully submitted,  
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CTWC President