

State of Texas
House of Representatives



VALINDA BOLTON
DISTRICT 47

June 21, 2010

Mr. John Burke, Chairman
Lower Colorado Regional Water Planning Group
P.O. Drawer P
Bastrop, Texas 78602

Sent via e-mail to jburke@aquawsc.com

Re: Comment on LCRWPG 2011 Draft Initially Prepared Plan

Dear Mr. Burke:

Please consider this letter as public comment on the Lower Colorado Regional Water Planning Group's 2011 Draft Initially Prepared Plan (IPP) for Region K. I recognize the time and work each member of the planning group has invested in the development of this plan and I thank you for the opportunity to submit comment.

As the state representative for a fast-growing, diverse constituency that includes large and small water suppliers, surface water and groundwater customers, well owners, and businesses that rely on the Highland Lakes, I have a strong interest in both water supply and water quality issues. Lake Travis, the Edwards Aquifer, and the Hays-Trinity Aquifer each lie partly within my district.

The following are my comments on some specific issues addressed by the plan:

- 1) Drought Management: I am glad to see the use of drought management strategies in the IPP for the first time in developing water supply strategies for a drought-of-record (DOR) scenario. Prior to the consideration of expensive water supply infrastructure projects, we should adjust demand expectations during drought. Especially during a DOR, outreach and education for user groups and mandatory restrictions should be expected to reduce usage. For example, in the most recent 2008-09 drought, the City of Austin demonstrated that drought management strategies like outdoor watering restrictions can have significant impacts on demand. Our planning should account for modifications in human behavior through demand adjustment, and through the

planning process, we have an opportunity to make clear that user groups and suppliers will be expected to participate in drought demand reduction strategies.

- 2) Conservation: Conserved water is the least expensive, most efficient, and most environmentally sound source of new water supply available. I encourage the planning group to continue to prioritize conservation as the first strategy pursued in considering new supply development. I commend the efforts of Region K's major water suppliers to aggressively pursue conservation strategies. Unfortunately, in light of the expected \$18 billion budget shortfall legislators will encounter next session, I am not optimistic about the level of financial support that the state can provide for implementing these measures in the near future. However, funding conservation measures will continue to be a priority for me and any water supply development funds that the state makes available should prioritize conservation. A failure to work together in areas of identified shortage to strongly embrace conservation measures does a disservice to both taxpayers and the environment.
- 3) Data Analysis and Collection: Adequate data is one of the most critical requirements for sound planning. I fully support efforts to expand data collection and develop water availability models that can integrate groundwater and surface water sources to provide as full a picture of water availability and hydrologic variance across the state as possible. As identified shortages intensify, it is critical for the success of the regional planning process that planning groups have accurate information in regard to availability determinations. I am glad to see that Region K members included the development of joint availability modeling as a policy recommendation in the IPP and I support efforts to develop this modeling.
- 4) Environmental Needs: Although Region K has strong participation by environmental groups, I am concerned that regional planning groups do not have an appropriate mechanism for evaluating environmental needs. Particularly in basins that are stressed for supplies, a recognition of the importance of environmental flows in the planning process is needed. I am hopeful that the results of the environmental flows process established under SB 3 will be integrated into the regional plans during the next round of planning and I fully support efforts to ensure that environmental needs (including water quality requirements) are considered alongside human needs in each basin. I am also hopeful that the SB 3 process will help lawmakers recognize weaknesses in the available environmental data tools and ways that the state might contribute to improving this data.
- 5) Sustainable Groundwater Use: The IPP includes a number of proposed water supply strategies that involve the expansion of groundwater resources. Moving forward, each of these potential projects must be evaluated independently, taking into account the economic feasibility of the project and

the desired future conditions of the relevant aquifer to ensure that our planning documents reflect the best possible prediction of project outcomes. Conjunctive use is a tool that may be available to reduce reliance on groundwater when surface water is available to meet needs, especially in low-recharge aquifers. Mining aquifers endangers our long-term water supply and I encourage the planning group to consider conjunctive use as a water supply strategy where it does not negatively impact environmental flows.

- 6) The Water-Energy Nexus: I commend the planning group for recommending that the state require that new energy generation facilities use water-efficient technology and develop a sustainable water supply prior to construction. Huge amounts of water are required to produce energy and increased demand for energy during the summer months exacerbates existing water shortages. Although the state has a limited ability to ensure that conservation goals are met at the individual user level, power generation is an area where state policies in regard to water requirements can have a significant impact. I support the adoption of these requirements at the state level.

I would also like to comment on the outstanding level of communication between stakeholders in Region K. In my conversations with individual planning group members and other regional stakeholders, each one has commented on the high level of engagement and cooperation that participants bring to the table. Stakeholder-driven planning processes have been demonstrated to work well in Texas and much of that success is due to this commitment to cooperation. Effective communication between governmental entities, planners, suppliers, and customers helps to ensure that we are managing our water resources as effectively as possible.

I thank you for considering my comments. I hope that the LCRWPG members find my participation helpful and I look forward to continuing to work with the planning group members to implement thoughtful, science-based water policy at the state level.

Sincerely,



Valinda Bolton
State Representative
District 47